

May 25, 2007

**VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY**

Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
PO Box 47250  
Olympia, WA 98504-7250

Attention: Carole Washburn  
Executive Secretary

Re: ***Public Utility Regulatory Act Standards  
Standards for Interconnection to Electric Utility Delivery Systems  
WUTC Docket UE-060649***

Dear Ms. Washburn:

On April 30, 2007, the Washington Utilities and Transportation Commission (Commission) issued a *Notice of Opportunity to File Written Comments* (Notice) in the above-captioned matter. The Notice seeks input from interested parties on a set of proposed interconnection rules developed by Commission staff. PacifiCorp appreciates the opportunity to comment on the proposed rule language and provides the following comments and recommendations in response to the Notice.

**1. General Comments.** In general, PacifiCorp supports the proposed interconnection rule as developed by the Commission. On February 27, 2007, PacifiCorp submitted an extensive set of comments and recommendations on the proposed interconnection rule as it existed at that time. The proposed rule circulated with the April 30 Notice contains a number of revisions addressing PacifiCorp's February 27 comments and PacifiCorp supports those revisions. Additionally, PacifiCorp has reviewed and generally supports the joint comments of Avista Corporation and Puget Sound Energy filed in response to the Notice.

**2. Definition of "Network Protectors".** Proposed WAC 480-108-020(2)(e) states:

The interconnection customer must provide evidence that its generating facility will never result in reverse current flow through the electric company's network protectors.

PacifiCorp notes that the term "network protectors" is not defined in the proposed rule and PacifiCorp is concerned that the meaning of the term is not self evident. To address this concern, PacifiCorp recommends the addition of the following definition to proposed WAC 480-108-010:

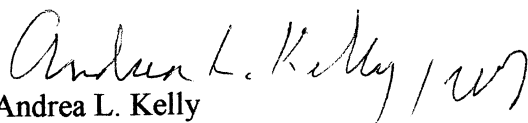
**"Network protectors"** means devices installed on a secondary spot network designed to detect and interrupt reverse current flow (flow out of the network) as quickly as possible, typically within 3 to 6 cycles.

**2. Net Metering.** PacifiCorp believes the rule needs to state with greater clarity that it applies to net metering facilities. To address this concern, PacifiCorp recommends the following modification to proposed WAC 480-108-001(3):

This chapter governs the terms and conditions under which an interconnection customer's generating facility (including without limitation net metering facilities) will interconnect with, and operate in parallel with, the electrical company's electric system. This chapter does not govern the settlement, purchase or delivery of any power generated by an interconnection customer's net-metered or production-metered generating facility.

PacifiCorp appreciates the opportunity to participate in the Commission's interconnection rulemaking process. Please direct any questions regarding these comments to Shay LaBray, Regulatory Affairs Manager, at (503) 813-6176.

Respectfully,

  
Andrea L. Kelly  
Vice President, Regulation

cc: Dick Byers, WUTC