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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

February 2, 2005

**VIA OVERNIGHT DELIVERY**

Honorable James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

RE: Advance Notice of Proposed Rulemaking Regarding Small  
Generation Interconnection Standards and Procedures  
Docket No. L-00040168  
COMMENTS OF THE PEOPLES NATURAL GAS  
COMPANY d/b/a DOMINION PEOPLES

Dear Secretary McNulty:

Please accept for filing in the above-captioned proceeding the enclosed original and fifteen (15) copies of the Comments of The Peoples Natural Gas Company, d/b/a Dominion Peoples.

Please acknowledge receipt of this document for filing by stamping the enclosed extra copy as "Received" and returning it in the enclosed self-addressed stamped envelope.

If you have any questions concerning this filing, please direct them to me.

Very truly yours,

William H. Roberts  
Counsel for The Peoples Natural Gas  
Company, d/b/a Dominion Peoples

FEB 02 2005

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Advance Notice of Proposed	)	
Rulemaking Regarding Small	)	Docket No. L-00040168
Generation Interconnection	)	
Standards and Procedures	)	

**COMMENTS OF THE PEOPLES NATURAL GAS COMPANY  
d/b/a DOMINION PEOPLES**

By Order entered November 19, 2004, the Pennsylvania Public Utility Commission ("Commission") initiated an Advance Notice of Proposed Rulemaking ("ANOPR") concerning small generation interconnection standards and procedures in order to standardize the way in which small generation connects to the distribution grid. Dominion Peoples supports the Commission's efforts in this subject matter area and also supports the adoption of standardized interconnection procedures (such as the significant step in that direction in July 2003 with the adoption of the IEEE 1547 Standards and the subsequent effort to standardize interconnection requirements for small generation resources, less than 2 MW, for "PJM jurisdictional generators").

Dominion Peoples' direct experience with the small generator installation process has been with fuel delivery and equipment installation issues and not with interconnection issues. Therefore, Dominion Peoples is not taking a position at this time on "best practices" interconnection procedures and standards; however, Dominion Peoples does intend to

actively participate in this proceeding as it moves through the administrative process, including the filing of reply comments and additional comments at the appropriate times.

Respectfully submitted,

A handwritten signature in cursive script, reading "William H. Roberts", is written over a horizontal line.

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Dated: February 2, 2005