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Thank you for this opportunity to participate!

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DOCKET U-180117

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Commission Policy on Customer Choice for Smart Meter Installation Docket U-180117

March 12, 2018

QUESTIONS FOR CONSIDERATION

To facilitate the development of its policy on smart meter installation choice, the Commission requests stakeholder feedback on the following questions.

Smart Meter Installation Opt-In/Opt-Out

1. Should companies be required to offer customers the choice to opt-out of smart meter installation at their premises? Alternatively, should customers affirmatively opt-in?

Opt-In – definitely. I should not have to opt out of something I never requested and actually oppose. So many people are not even aware that they will soon be getting an AMI, so by having to give their consent through the opt-in agreement, they will be making a conscious, informed decision and will know that they are taking on the liability for any damage. This option will allow time to check their insurance policy and also perform their due diligence. The existing tacit agreement is somewhat devious.

2. Should companies be required to offer all customer classes the choice to opt-out or opt-in for smart meter installation?

Yes, Having exceptions can possibly create misapplication.

3. What company estimates, if any, have already been developed for how many customers would choose to opt-out or opt-in for smart meter installation?

Unknown. Our PUD has chosen an opt-out program so these numbers, if they exist, were never shared.

Smart Meter Benefits

4. What challenges do the companies face based on different levels of opt-in and opt-out (e.g., 1 percent, 5 percent, 25 percent) and what smart grid benefits are either reduced or eliminated at these levels?

I do not have this information.

5. For those customers who select to opt-out of, or decline to opt-in to, smart meter installation, what types of services or benefits would they be forgoing?

In my opinion, none. I am not convinced that there are any true benefits to the consumer. Perhaps to the PUD, but not the consumer. However, I suppose if a consumer is interested in interacting with any Smart Appliances or Home Devices, then they would be missing that opportunity.

Costs

6. What types of costs are associated with offering an analog/existing meter opt-out option?

The Chelan PUD is still formulating this. They have stated: if a person chooses to maintain their analog meter, it will require a meter reader to drive to the home and they will be required to pay an additional fee for that service – unspecified at this time.

7. Are costs a function of the number of customers choosing to opt-in or opt-out? ***Unknown.***

8. Should all costs associated with the opt-out choice be paid by the individual customer making that election or should some portion of those costs be allocated to all ratepayers and/or to company shareholders?

All costs should be covered by company shareholders. Having costs associated with the opt-out is unfair for all; however, more so for low-income households. Even if they wish to opt-out, they may possibly be forced to accept the smart meter due to a very tight budget.

Fees

9. What fees (one-time/recurring) should be assessed to customers who elect to opt-out and should the fees be assessed on a per-meter or per-location basis?

No fees to consumer. Having a fee is a nefarious way to force the meters onto folks that would choose the opt-out but perhaps cannot afford the fees– or would simply choose not to participate in paying extra fees.

10. If a monthly fee component is included, should there be a limited duration for companies to recover the incremental costs associated with the customer's choice to retain an analog/existing meter?

This is confusing. What possible costs could occur if I maintain my analog meter? No new equipment; no time or personnel for installation.

11. If a one-time or up-front fee is required, should the companies be required to offer a payment plan?

'IF'... absolutely! Again, so that all could possibly choose their preferred option. As I already stated, a fee seems unreasonable.

12. If recurring opt-out fees are assessed with each meter reading, should alternative meter reading schedules be adopted to reduce the opt-out fees paid by the customer (e.g., bi-monthly, quarterly, or annually with budget billing)?

YES. Annually. Monthly payments can be estimated from previous usage records. Or consumer can take photo of meter and send to PUD. Many areas use this method.

13. Should fees differ based on whether the customer is selecting to opt-out of a smart meter for a single service (e.g., electric or natural gas) or both services? ***Yes.***

14. Should there be a fee imposed on customers who elect to opt-out and later desire to have a smart meter installed? **No.**

15. Should opt-out fees be a separate line item on a customer's bill? **Yes, definitely!**

Options

16. Should more than one opt-out option be offered to customers who do not wish to have a wireless smart meter (e.g., a digital non-communicating meter)? If so, should the cost differ based on the type of meter selected?

Yes, that would be optimal. (Unfortunately in Chelan County, we are not being offered an option.) No cost difference.

17. Should customers with smart meters be offered the opportunity to relocate the smart meter to another location on their premises? Is so, should the customer pay the cost of relocation?

Yes to both questions.

Customer Communication

18. What form(s) of communication should the companies employ to advise customers of their smart meter installation options, and what type of information should be communicated?

Multiple forms of communication – depending on what information is in the client's profile. Not all people have email or cellular phones.

1. At least 2 forms of communication for every household.
 - email / text / voice message
 - Direct mail (hard copy) in personalized letter format. (Possibly Registered Mail ?)
No postcards or flyers...they resemble ads or solicitations and often are overlooked and dropped in the recycle bin without reading.

2. The information should obviously clearly state the company's intention and procedure:
 - Inform their intent to install the smart meter on every home that wishes one
 - explain that the occupant has options and describe each of the options with associated fees
 - state that a directive from them must be received by the PUD
 - indicate the date by which they must communicate their choice
 - eventually include what will take place if no response is received.