

Agenda Date: August 27, 2020

Item Numbers: A1 & A2

Dockets: **Dockets UE-200692 and UG-200693**
Company: Avista Corporation d/b/a Avista Utilities

Staff: Andrew Roberts, Regulatory Analyst - Consumer Protection

Recommendation

Allow the tariff revisions filed by Avista Corporation d/b/a Avista Utilities on July 30, 2020, as revised on August 11, 2020, to go into effect September 7, 2020, by operation of law.

Discussion

On July 30, 2020, Avista Corporation d/b/a Avista Utilities (Avista or company) filed proposed tariff revisions to its electric Schedule 80 and Natural Gas Schedule 180, “Advanced Metering Infrastructure (AMI) Opt-Out.” The filings add language that consider a customer an AMI opt-out customer by default if the customer has not returned a signed AMI opt-out application form and has not allowed the company access to replace the existing meter with a communicating meter by October 1, 2020.

Under the current Tariff Schedule 80 and 180, customers that have chosen to opt-out of receiving a communicating meter by returning a signed application form are subject to the terms and conditions of AMI opt-out service, including a monthly fee of \$10. The current tariff language does not allow Avista to provide non-communicating meter service to a customer unless the company has received a signed application form.

Avista has completed approximately 87 percent of its AMI deployment and of that, 95 customers have refused to sign the non-communicating service application form and refuse to allow company representatives access to install a new AMI meter. Customers who refuse to return a signed application form to the company and refuse to allow company representatives access to install a new communicating meter are effectively receiving non-communicating meter service without being subject to the commission approved terms and conditions in Avista’s AMI Opt-Out tariffs, including the monthly \$10 fee.

While the company can disconnect these customers for refusing access to the meter in accordance with WAC 480-90-128(3)(d) and WAC 480-100-128(3)(d) and Tariff Schedule 70 and 170, Avista and commission staff believe that disconnection of service should be used as a last resort.

Avista proposes to revise the language in its tariff to allow the company to provide AMI opt-out service to customers who refuse to sign the application for non-communicating meter service and who refuse to allow the company access to install a communicating meter. These customers would receive non-communicating meter service in accordance with the terms and conditions present in Schedule 80 and 180.

Customer Comments

On August 4, 2020, the company notified affected customers by mail of the proposed tariff change to begin providing AMI opt-out service subject to the current terms and conditions in Tariff Schedules 80 and 180. Customers were notified that they may access relevant documents about this proposal on the commission's website, and that they may contact Andrew Roberts at 1-888-333-9882 or andrew.roberts@utc.wa.gov with questions or concerns.

Staff have received four comments on the proposed revisions to the AMI opt-out service. All the comments oppose paying the meter reading fees. Three comments oppose signing the AMI opt-out application.

Conclusion

Commission staff has reviewed Avista's proposed revisions to tariff Schedules 80 and 180 and find them to be reasonable. Staff do not believe a subset of opt-out customers should be excluded from the terms and conditions of AMI opt-out service because they refuse to sign the application for AMI opt-out service and refuse access to install a communicating meter. Staff recommends the commission allow the tariff revisions filed on July 30, 2020, as revised on August 11, 2020, to go into effect September 7, 2020, by operation of law.