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VIA ELECTRONIC FILING

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Re: Docket U-180525—Pacific Power & Light Company's Comments

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On December 21, 2018, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Opportunity to File Written Comments regarding draft changes to the consumer protection and meter-related rules (AMI Rules) as Advance Metering Infrastructure (AMI) technologies are deployed. In response to this notice, Pacific Power & Light Company (Pacific Power), a division of PacifiCorp, submits these written comments to respond to the questions for consideration set forth in the notice and to otherwise provide comments on the draft AMI Rules.

AMI Meter Testing and Accuracy Requirements

1. What types of certification are available for meters?

Pacific Power currently purchases meters from the two manufacturers, Aclara and Itron. Certifications are available for these meters confirming that they are designed and tested to be in compliance with American National Standards Institute (ANSI) C12.1 Code for Electricity Metering, ANSI C12.20 Standards for Electricity Meters 0.2 and 0.5 accuracy class, and Underwriters Laboratories 2735 Standard for Electric Utility Meters.

2. How is meter accuracy tested?

During the manufacturing process, all meters purchased by Pacific Power are calibrated and then tested at Full Load, Light Load, and Power Factor against reference standards with traceability to legal standards at the US Commerce department at the National Institute of Standards and Technology (NIST). A testing record is produced for every meter purchased by the company. Testing records consist of meter accuracy measurements under full load and light load and power factor.

3. Are there concerns related to power quality that could affect performance and accuracy of the meters?

No. The meters are tested as outlined in the ANSI C12.1 and C12.20 standards, which include testing under a range of power quality conditions.

4. **Please refer to Attachment B. In the article, *Challenges for Smart Electricity Meters due to Dynamic Power Quality Conditions of the Grid: A Review*, the author states, “The understanding of the relationship between power quality and the accuracy of electricity meters is useful to evaluate the impact of including a standardized procedure to properly calibrate meters under distorted waveform. Further and continuous investigation is required to minimize the error of electricity meters under any possible working condition. The current permissible error in applicable accuracy related standards could be a cause of significant revenue losses for utilities.”**

a. **Does the company know of any modification to current standards to address this issue?**

Pacific Power is not aware of any changes to the current standards that will be adopted in the near future.

b. **Do companies know of any circumstance where meter readings are not accurate? If inaccuracy of meters is known under certain circumstances, what circumstances trigger the inaccuracy? What can Companies do to correct this problem?**

No, the company is not aware of any real world circumstances where meter readings are inaccurate or where harmonics would cause a meter to be inaccurate.

c. **Does the company know if the meters have been tested for current waveform distortion caused by LED, CFL, and dimmers?**

The company is aware that some meters have been subject to verification with various real-world loading scenarios including light-emitting diode (LED) and compact fluorescent light bulb (CFL) lamps used in combination with electronic light dimmers. The ANSI C12.20 test suite was developed to test the wave form signatures for devices made by manufacturers that adhere to their required standards.

d. **Are meters tested in their capability to measure accurately under distorted waveform conditions?**

Meters have all been tested according to the ANSI C12.20 standard, which specifies several tests intended to demonstrate accurate performance under distorted waveform conditions with frequency components up to the 19th harmonic of the 60 Hertz fundamental frequency.

5. Has the company considered adopting standard ANSI C12 – Smart Grid Meter Package? Please provide the rationale for your response.

Yes. The company has adopted the ANCI C12 – Smart Grid Meter Package standards with respect to its AMI meters. This Standard was adopted due to the company's AMI meter deployments in its Oregon and California service territories.

Remote Disconnect

6. Do companies have restrictions in tariff or in practice for disconnecting service during times when the temperature will be low or high? If so, please describe.

Pacific Power does not have a tariff requiring a weather moratorium, but it is company policy to stop disconnecting customers when certain weather conditions exists. The company monitors the weather and takes action based on the National Oceanic and Atmospheric Administration National Weather Service alerts for extreme low or high temperatures.

7. Public Counsel suggests limiting disconnections for non-payment on days that are forecast to be 32 degree Fahrenheit or less.

a. What are the advantages of this limitation?

If the forecasted *high* temperature of the day is 32 degrees Fahrenheit or less, Pacific Power believes limiting disconnections for non-payment is a fair and reasonable protection to have in place for the company's customers and is consistent with Pacific Power's current policies.

b. What are the disadvantages of this limitation?

Unless the temperature forecast threshold is specified at a *high* of 32 degrees Fahrenheit or less, the moratorium on disconnections could become problematic and lead to an increase in customer arrears. If a moratorium on disconnection were applied to forecast that include 32 degrees as a low or a mid-range temperature, the limitations on disconnection would apply too frequently, particularly areas of the company's service territory with wide daily temperature fluctuations of 30 degrees or more between the high and low temperatures.

As an example, 53 days during the first quarter of 2018 would be included in the moratorium for Yakima if the 32 degree forecast threshold did not apply to days where the *high* is 32 degrees. It is not unusual for the lows to drop below freezing at some point at night during the winter. Customers would see an increase in arrears, in such case, and other offerings would need to be provided to assist customers with successfully managing their bills.

Instead, a weather moratorium should protect customers from extreme weather conditions as opposed to normal weather conditions experienced regularly by customers. Pacific Power agrees a forecast calling for a *high* of 32 degrees or lower would qualify as an extreme weather event that should trigger any limitations on disconnections for non-payment.

c. Should Washington restrict disconnections during cold weather? If so, describe alternative policy recommendations.

Pacific Power supports a weather moratorium on disconnection of power within the parameters specified in question 7, but requests consideration of additional criteria be in place to alleviate high energy costs. The winter low-income payment plan outlined in WAC 480-100-143 not only reduces the number of disconnections, but also offers a path for customers to maintain costs and seek other assistance.

For the benefit of customers who do not qualify for the winter low-income payment plan, a cold weather moratorium on disconnection could be offered where customers agree to an installment payment plan and are seeking or have exhausted available governmental energy assistance. This type of program would enable customers to avoid the accumulation of high balances and the subsequent financial burden that could result from disconnecting service when the cold weather subsides.

8. In regards to placing limitations on the time of day utility service can be disconnected remotely, what does a policy look like that would allow the customer time to resolve the reasons of the disconnection on the same day?

Pacific Power has AMI meters with remote reconnection capabilities in Oregon. Once the customer remedies the cause for the disconnection, the power is turned back on within a half an hour. Pacific Power's call centers are open 24/7 and are able to assist customers with AMI meters with remote power reconnections at any time. Employees are available to manually reconnect customers without AMI meters from 8:00 a.m. to 7:00 p.m. seven days a week.

a. Does the utility have a policy to temporarily delay a disconnection, if the dispatched utility representative finds a vulnerable resident such as, but not limited to a low-income resident or a resident with a medical issue (who has not declared a medical emergency)?

If a customer has informed the company of life support equipment in the home, the company will make additional contacts with that customer before disconnecting service. If the customer has not responded to the additional contacts, an employee will visit the home to check on the status of the occupants before the power is turned off. Customers need to provide a completed medical

form from a qualified medical personnel verifying life support equipment is in operation in the home.

Pacific Power does not have AMI meters in Washington, and an employee is dispatched to disconnect the power per Rule 11B, Section C. It is always up to the employee visiting the home to make the final decision on whether to disconnect the power. If the company is not notified of medical issues in advance, the risk is that the employee disconnecting the service will not be aware of medical issues when making that decision.

Pacific Power does not remotely disconnect life support customers in California and Oregon, where AMI metering is currently in place. If a customer provides documentation from qualified medical personnel that electricity is required to operate life sustaining equipment, then the meter installed is not enabled for a remote disconnect as a precautionary measure. Extra contact is made with these customers and an employee visits the home before disconnecting service. These are customers with an “active” medical profile, not customers with “medical emergency.”

Pacific Power strongly objects to the language in the draft AMI Rules requiring the utility to not proceed with a disconnect for nonpayment where a customer “has had a medical emergency verified in the prior two years”. It is burdensome and unnecessary to continue to track possible medical customers for two years after their certification has expired and was not renewed. The medical emergency may no longer exist, and all customers will receive numerous contacts before disconnecting service. In addition to other regulated notices, the company calls the customers with remote disconnection capabilities six times over three days before disconnecting service, which provides ample opportunity for customers to contact the company regarding any medical conditions that may exist in the home. Pacific Power respectfully requests that the language be changed to “customer with an active medical certificate.

- b. On average, what percentage of utility customers are disconnected per day? Please include all disconnections, not just those directed by the utility with notice. Please provide electric and gas customer information separately.**

Pacific Power only provides electric service, and, on average, disconnects less than one percent of the company’s 130,000 customers a day, including meter disconnects for which no notice is required and disconnects where there is no customer of record.

9. When a customer is disconnected for non-payment, how long will the company take to remotely reconnect service after payment has been received? Will service be reconnected the same day?

Pacific Power does not have AMI service in Washington at this time. However, in other states where the company has AMI service available, the meter reconnection is averaging at approximately 20 minutes regardless of the day of the week or the time of the day.

10. Do you currently reconnect service 24 hours a day, seven days a week? If not, what is your practice?

Pacific Power does not have AMI metering installed in Washington at this time. While the fees vary, employees are available to reconnect service from 8:00 a.m. to 7:00 p.m. seven days a week.

Meter Testing and Accuracy Requirements

11. Should companies be allowed to collect and release, with no restrictions, aggregate load information that enables the identification of customer class consumption behavioral patterns?

Pacific Power responded to this in question 3.b.i in comments filed September 7, 2018, stating, "Aggregated usage information that does not allow customer information to be identified with any specific customer should be allowed to be released." At this time the company is not able to track interval data by customer class in Washington where it has not deployed AMI meters. AMI meters will be able to track usage by hourly intervals which will provide more consumption data per class.

Additional Comments and Redline Edits to the Draft Rules

PacifiCorp provides suggested changes to the AMI Rules shown in blackline and offers the additional commentary set forth below.

1. WAC 480-100-128 Disconnection of service.

(4)(a)(i) The utility must provide the first written disconnection notice by email, text, or other electronic communication, if the utility has such contact information for the customer, ~~and~~ by delivery of a hard copy to the service premises. The notice must include a disconnection date that is not less than eight business days after the date the utility either delivers the notice to the service premises and attaches it to the customer's primary door or mails the notice, if the utility mails the notice from inside the states of Washington, Oregon, or Idaho. The disconnection date in the notice may not be less than eleven business days from the mailing date, if the utility mails the notice from outside the states of Washington, Oregon, and Idaho.

Pacific Power respectfully requests the rules allow for electronic-only communication for customers who have requested such service. Pacific Power has a growing base of customers who prefer electronic service only. Pacific Power recommends allowing for that flexibility in notifying customers.

- (6) Remote Disconnection. When disconnecting services remotely, the utility must:
- (a) Set a reasonable number of remote disconnections per 24 hour period, which its system cannot exceed, or take other reasonable measures to prevent unauthorized disconnections;
 - (b) Perform all remote disconnections for non-payment between the hours of 8 a.m. and noon;
 - (c) Visit the customer's premises and provide the customer with an opportunity to pay via appropriate methods including providing payment to the dispatched utility representative prior to disconnecting a customer ~~who has had a medical emergency verified in the prior two years~~ with an active medical certificate, in accordance with subsection (8) of this section;

As stated above, Pacific Power does not remotely disconnect life support customers in California and Oregon, where AMI metering is currently in place. But as discussed above, Pacific Power respectfully requests that the language be changed to "customer with an active medical certificate".

- ~~(d) Visit the customer's premises and provide the customer with an opportunity to pay via appropriate methods including providing payment to the dispatched utility representative prior to disconnecting a customer who has received low income assistance in the prior two years.~~

The requirement to track all customers who may have received energy assistance in the past two years is unduly burdensome to the company. As stated earlier, Pacific Power places six outbound calls over the span of three days before remotely disconnecting a customer. This provides ample opportunities for the customer to make payment or make arrangements to avoid disconnecting service.

In addition, Pacific Power already has protections in place so customers do not get disconnected for nonpayment after receiving an energy assistance pledge. The company created a web portal for agencies to directly input pledges for energy assistance streamlining and expediting the process. The pledge is deducted from the customers balance and no attempt is made to collect the pledge amount until the payment is received. Some customers receive energy assistance every year, while other customers only have temporary financial setbacks and receive it one time. It is unnecessary to add an additional step to track and make personal contact with any customer who has received energy assistance for two years. Pacific Power respectfully requests that subsection (d) be deleted in the rule changes.

2. WAC 480-100-153 Protection and disclosure of private information

(5) As between the utility and the customer, a utility remains responsible for the safeguarding of all personally identifiable information the utility discloses to affiliates, subsidiaries, parent corporations, or third party vendors to the same extent that the utility must safeguard that information when it is in the utility's possession.

This change clarifies that the responsibility of the utility to safeguard information that has been disclosed to affiliates, subsidiaries, parent corporations, or third party vendors is for the benefit of the customer. As drafted it is overly broad. This clarification helps preserve the utility's right to enforce the obligations of such affiliates, subsidiaries, parent corporations, or third party vendors to safeguard the information under applicable contracts and regulations, etc.

(24) The utility will perform an annual audit of data collected and review the purpose of the data collection to ensure it collects only necessary data.

Pacific Power's current AMI equipment captures whole house energy use. The data is encrypted and is compliant with NIST standards. The equipment will only capture the energy usage. It is unclear what is meant by requiring utilities to collect only "necessary data" when the meters only report the amount energy used by any given household.

3. WAC 480-100-318 Meter readings, multipliers, and test constants.

(5) Commercially acceptable measuring devices that have the capability to do so, must measure all energy sold to customers at a minimum of 15-minute intervals.

For customers in Oregon and California with AMI metering, Pacific Power provides energy consumption in 15-minute intervals for nonresidential customers. However, the company has found that 15-minute interval data is not useful or meaningful for residential customers since many residential customers use less than one kilowatt hour per 15-minute interval. Therefore, the company provides residential customers energy usage data in 60-minute intervals. Pacific Power recommends distinguishing residential and non-residential customers for this requirement.

(6) Utilities must submit annual reports of the measurements aggregated by month and customer class.

Pacific Power is unclear on the purpose or the intent of adding an annual report by month and by customer class. While the company is always supportive of the Commission's review of company information and business practices, Pacific Power is unsure if putting an annual reporting requirement in the rules is the best path forward in the early stages of AMI adoption. Accordingly, Pacific Power requests clarification and context on the reporting requirement and respectfully requests that the Commission consider requesting annual reports in an order or docket to ensure that these reports provide sufficient value to the Commission before it becomes a perpetual requirement in rule.

Conclusion

Pacific Power appreciates the opportunity to collaborate with staff and stakeholders on these draft rules and looks forward to further discussion on this important topic.

Please contact Ariel Son at (503) 813-5410 if you have any questions.

Sincerely,

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Enclosures