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April 3, 2020

VIA UTC WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
Lacey, WA 98503

State Of WASH.
UTIL. AND TRANSP.
COMMISSION

04/03/20 16:56

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Re: *Tariff Revision U-28, Schedule 80, Meter Reading and Billing Practices to update the monthly meter reading fee for customers using non-communicating meters, Docket UE-200013*

Dear Mr. Johnson:

On January 6, 2020, Avista Utilities (“Company” or “Avista”) filed a tariff revision for their meter reading and customer billing practices, specifically concerning customers who opt out of communicating meters (or “AMI”). The Company revised their initial tariff filing on March 4, 2020, changing the monthly fee for customers who opt out of AMI use and extending the effective date to April 13, 2020. Public Counsel respectfully offers the following comments on the Company’s tariff filing, as considered by the Utilities and Transportation Commission (“Commission”).

Public Counsel’s Recommendation

Public Counsel recommends approving Avista’s proposed revisions to monthly AMI opt-out fees and low-income customer waivers.

I. GENERAL

Public Counsel filed comments in the Company’s AMI Opt-Out Pilot on July 20, 2018, in Docket UE-180418. The comments stated, “Public Counsel generally considers replacing existing meters that are functioning well as potentially wasteful, especially if the meter has been installed in recent years.”¹ Public Counsel maintains this position. Furthermore, Public Counsel’s recommendation to approve the tariff revisions in Docket UE-200013 does not equate to acknowledgment of the prudence or imprudence of the Company’s overall investment in AMI. Rather, Public Counsel’s position relates only to the fees charged to customers who choose not receive service through a communicating meter.

¹ Comments of Public Counsel at 2 (July 20, 2018), *Avista Tariff WN U-28, Schedule 80 “Meter Reading and Billing Practices,”* (Docket UE-180418 and UG-180419).

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II. AMENDING AVISTA'S MONTHLY MANUAL METER READING FEES

In our July 20, 2018, Comments to the Commission, Public Counsel supported approval of Avista's AMI Opt Out Pilot (Dockets UE-180418 and UG-180419). To the extent applicable, Public Counsel reiterates our comments in this docket. One of the primary differences between the Pilot filing and the filing in this docket is an increase to the monthly fee charged to customers who opt out of AMI service in order to cover the cost of manual meter readings, at least in part. The new fee, if approved, would result in an increase from \$5 to \$10 monthly for Avista's customers who choose to use a non-communicating meter for electric service.

According to the Company's filing, the proposed \$10 monthly fee is "below the estimated meter reading cost,"² which is estimated to cost \$64.57 per quarterly meter reading visit or \$21.52 on a monthly basis.³ The Company's proposed \$10 monthly fee is a reduction from their original proposal of \$15 per month. Furthermore, the Company does not propose any changes to the \$75 one-time fee charged for customers who wish to have non-communicating meters installed, which is waived if customers opt out within 30 days of the AMI meter installation. Public Counsel believes the proposed monthly manual meter reading fee strikes a balance between fairness and moving toward a cost-based approach for charging fees in order to send the appropriate price signal to customers.

III. INCOME-BASED FEE WAIVERS

Public Counsel supports continuation of monthly fee waivers for customers who have qualified for low-income bill assistance within in the 12 months prior to opting out of AMI meter use. The Company initially proposed elimination of the fee waiver for income-qualifying customers.⁴ Public Counsel supports approval of the tariff with the inclusion of low-income fee waivers, given that the fees may create financial hardship and that only a small number of income-qualifying customers have completed opt-out paperwork at the time of the Company's filing.

Public Counsel appreciates the Company's ongoing willingness to work with stakeholders and take feedback into consideration, as is the case in this particular matter. Questions can be directed to Corey Dahl, at (206) 464-6380 or corey.dahl@atg.wa.gov.

Sincerely,

/s/ Corey J Dahl
COREY J. DAHL
Regulatory Analyst
Public Counsel Unit
Washington State Office of the Attorney General.

² Avista Advice Letter at 2 (Mar. 4, 2020).

³ Avista Advice Letter at 6 (Jan. 6, 2020).

⁴ Avista Advice Letter at 2 (Mar. 4, 2020).