

October 11, 2019

VIA ELECTRONIC FILING

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

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10/11/19 13:43
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UTIL. AND TRANSP.
COMMISSION

RE: Advice 19-06—Revision of Rule 7 to Allow for Unmetered Service for Small Usage Devices

Pacific Power & Light Company (Pacific Power), a division of PacifiCorp, submits this proposed modification to rule applicable to Pacific Power’s electric service in the state of Washington in compliance with RCW 80.28.050, WAC Chapter 480-80, and the Washington Utilities and Transportation Commission’s (Commission) Rules and Regulations. Pacific Power respectfully requests an effective date of November 23, 2019.

First Revision of Sheet No. R7.1	Rule 7	General Rules and Regulations—Basis of Rates
First Revision of Sheet No. R7.2	Rule 7	General Rules and Regulations—Basis of Rates

Filing Overview

The purpose of this filing is to modify the company’s rules to allow the offering of a non-metered service option for small usage devices with rated capacity of less than 2,000 watts per point of connection, when, at the sole discretion of the company, usage is impractical and/or unsafe to meter. Pacific Power proposes this change primarily to provide flat rate service to small cell communication antennas, which support mobile communication networks in high-density areas.

As the use of mobile information devices by the general public continues to expand, the communication industry seeks to provide networks with sufficient capability to meet increased mobile communication demand. To support this increased mobile communication demand, communication infrastructure necessitates expansion of fourth generation broadband cellular network technology (4G) networks and the addition of fifth generation broadband cellular network technology (5G) networks. Providing this infrastructure support to expand 4G and introduce 5G requires the installation of small cell antennas, which provide significantly greater information data flow in areas of high density demand.

These high density demand areas are typically commercial areas that offer little or no space for meter pedestals or other non-pole mounted equipment. In many cases, additional structures in the sidewalk or parking strip are not permitted, and many local jurisdictions do not allow installation of meters on poles for aesthetic reasons. On numerous occasions, the company has

heard from cell carriers that meter installation challenges are a major impediment to their buildout of cell networks.

This rule change would allow the company to instead bill these small usage customers on deemed usage with periodic true-ups to ensure correct collections. Billing for these devices would be determined based on deemed usage of the devices operating at 100 percent of capacity. Pacific Power's proposed tariff revisions specify that a customer participating in this option would be required to inform the company of changes in its load with 30 days advanced notice.

It is respectfully requested that all formal correspondence and data requests regarding this filing be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, Oregon, 97232

Please direct any informal inquiries regarding this filing to Ariel Son at (503) 813-5410.

Sincerely,

 /s/
Etta Lockey
Vice President, Regulation
Pacific Power & Light Company
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Enclosures

Attachments

Attachment A: Summary Page of Tariffs
Attachment B: Proposed Tariffs