

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Dockets UE-190529 & UG-190530  
Puget Sound Energy  
2019 General Rate Case**

**PUBLIC COUNSEL DATA REQUEST NO. 256:**

Please refer to Catherine A. Koch's Rebuttal Testimony, Exh. CAK-6T at 4:15-17, which references an "(i)nability to obtain new electric replacement equipment as they have been discontinued and the reliance on a limited number (less than 250,000), of refurbished equipment."

- a) Provide identify with specificity the types of electric replacement equipment that have been discontinued.
- b) Provide documentation of the discontinuation of each type of electric equipment identified in your response to subsection (a) above.
- c) Describe with specificity what is meant by the reference that less than 250,000 of refurbished equipment are available. For example, are these meters, in the US, and/or in PSE inventory?
- d) Ms. Catherine A. Koch's Revised Direct Testimony, Exh. CAK-1Tr, indicates that AMR meters were failing at a rate of 1.6 percent annually (Exh. CAK-4 at 4:16). How many years will 250,000 refurbished meters last if PSE's AMR meters continue to fail at a rate of 1.6 percent annually?

**Response:**

Puget Sound Energy ("PSE") provides the following response to Public Counsel Data Request No. 256.

- a) PSE provides the following table in response to subpart (a).

<b>Category</b>	<b>Equipment Number</b>	<b>Equipment Name</b>
Electric Meter + AMR Communication Module	98-2251	Focus AX S4
Electric Meter + AMR Communication Module	98-2207	Focus AL 1 way
Electric Meter + AMR Communication Module	98-2381	Focus AX USC
Electric Meter + AMR Communication Module	98-1155	Gridstream RF
AMR Communication Module for third party meters	98-2451	Series 4 kV2c

Electric Meter + AMR Communication Module	98-1715	Elster A2
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- b) Attached as Attachments A-F to PSE's Response to Public Counsel Data Request No. 256, subpart (b), is the requested documentation.
- c) The number of Landis + Gyr ("L+G") electric meters with a L+G Automated Meter Reading ("AMR") communication module that are either in the process of being refurbished by L+G or currently serving PSE customers now, which is the bulk of equipment, is about 250,000. This L+G equipment is harvested from the existing AMR system as a result of the Advanced Metering Infrastructure ("AMI") transition, which L+G refurbishes once it is removed. PSE's refurbished inventory is limited by the fact that compatible L+G communication modules are no longer manufactured and as stated in PSE's Response to Public Counsel Data Request No. 255, other manufacturer's AMR communication modules are not compatible with PSE's L+G network.
- d) If, hypothetically, the 250,000 refurbished AMR meters were readily available in inventory today (which they are not because many are still in service), PSE estimates the 250,000 would last between four and eight years, based on new customer growth at about 14,000-15,000 customers annually, and replacement needs from failed equipment, which is similar to customer growth. However, the calculation is inaccurate because the refurbished supply of AMR meters is dependent on the pace and number of AMI meters replaced, which changes from day to day. For example, as of today, only 9,148 refurbished AMR meters exist in inventory. In addition, the calculation requires several assumptions, such as an assumed harvesting pace, that location supports meter needs, that 100 percent of the harvested equipment is refurbishable, and that net metering growth (which requires two meters) stays flat, which is an unreasonable assumption in light of the Clean Energy Transformation Act and other clean energy interests.

# **ATTACHMENT A to PSE's Response to PUBLIC COUNSEL Data Request No. 256**

# Customer Service Alert

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## End-of-Sale and Last Time Buy Opportunity

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Subject: Series 4-Meter Communication Modules End-of-Sale Notification  
Product: FOCUS AX, FOCUS AXe and S4x

### Background

Landis+Gyr will be sunsetting the Series 4 communication technology modules for FOCUS AX, FOCUS AXe, and S4x meters. **The last time buy opportunity window is effective immediately and expires December 1, 2019.** Currently, the Series 4 modules only support the RF Mesh communication protocol; whereas the Series 5 alternative supports both RF Mesh and RF Mesh IP communication protocols.

Additionally,

- The FOCUS AX platform does not support Series 5 communication modules. Refer to the FOCUS AX End-of-Life Notification Customer Service Alert, 98-2268, for more information.
- S4x and AXe platforms do support Series 5 communication modules and are the alternatives for this product line. In order to take the Series 5 alternative, the minimum system requirements are:
  - Command Center 6.5 or later
  - Tech Studio 4.0 or later
  - Firmware 10.06 and DCW 10.02 and later
  - ZigBee firmware 2.03.08 and later



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**NOTE:** This does not impact the FOCUS AX Polyphase, Aclara kV2c, and the Elster A3 electric endpoints that incorporate Series 4 modules.

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Landis+Gyr will continue supporting the existing Series 4 endpoints deployed today.

## Action Required

The last time buy opportunity for the endpoint types listed in Table 1 will expire Friday, December 1, 2019.

Landis+Gyr asks that our customer base begin taking steps to transition to the Series 5 FOCUS AXe and S4x product lines. Please work with your local representatives for any support required in this process to include meter samples and testing assistance.

**Table 1. Endpoint Type End-of-Sale**

Endpoint	Part Number	Meter Form Number
Enhanced Modular FOCUS AX	26-1552-XXXX (4MB)	
	26-1553-XXXX (8MB)	
Enhanced Modular FOCUS AXe	26-1552-XXXX (4MB)	
	26-1553-XXXX (8MB)	
Enhanced Integrated FOCUS AX	40-1653-XXXX	2S, 2SE
	40-1562-XXXX	1S
	40-1564-XXXX	3S
	40-1565-XXXX	4S
Enhanced S4x	26-1552-XXXX (4MB)	
	26-1553-XXXX (8MB)	



**IMPORTANT:** *There is a limited number of 500,000 Series 4 modular communication modules available. Orders will be filled on a first-come-first-served basis. There is **no** limit to the number of **Series 4 Integrated** meters you can order.*

**For last time buy orders:**

- For Series 4 modular meters, deliveries will be completed by March 2020.
- For Series 4 integrated meters, delivery schedule and dates will be provided once your order has been placed depending on the volume of the order. Landis+Gyr plans to make its final shipments of Series 4 integrated meters by the end of June 2020.

## Customer Service

Please contact the Landis+Gyr Customer Support Team at 888-390-5733 for questions or assistance.

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# **ATTACHMENT B to PSE's Response to PUBLIC COUNSEL Data Request No. 256**



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# Customer Information Letter

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## End-of-Sale Notification

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Subject: End-of-Sale Notification  
Product: FOCUS AL One-Way Endpoints

### Introduction

The Landis+Gyr FOCUS AL One-Way product (Catalog ID 7th and 8th digits "70" and "90") is facing a component end-of-life issue, impacting Landis+Gyr's ability to produce new endpoints.

### Description

Effective January 18, 2019, Landis+Gyr will no longer be producing new FOCUS AL One-Way endpoints. This decision was made due to the end-of-life of an Integrated Circuit component and the unavailability of a replacement.

### Impact to Landis+Gyr One-Way Customers

Landis+Gyr will work on a customized plan to support maintenance and growth operations for each customer. Please reach out to the local Landis+Gyr program team for more information on the alternatives available for this product line.

### Customer Service

Please contact the Landis+Gyr Customer Experience Team at 888-390-5733 for questions or assistance.

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# **ATTACHMENT C to PSE's Response to PUBLIC COUNSEL Data Request No. 256**



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# Customer Service Alert

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## End-of-Sale and Last Time Buy Opportunity

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Subject: FOCUS AX USC End-of-Sale Notification  
Product: FOCUS AX USC (40-1335)

### Background

Landis+Gyr will be sunsetting the FOCUS AX UtiliNet Solution Center (USC) product (Landis+Gyr part number **40-1335**, Catalog ID 7th and 8th digit **0U**). Colorado Springs Utilities (CSU) is the only customer currently ordering this product and Landis+Gyr would like to offer a last time buy to cover CSU's immediate needs. Since this product is over 10 years old, several component end-of-life (EOL) challenges continue to impact it and significant time and effort would be required to keep this product active moving forward.

### Action Required

The last time buy opportunity for this product is effective immediately and will expire December 1, 2019. The total number of units available as a part of the last time buy are 4,000.

Landis+Gyr will continue to offer field support for the units deployed today.

### Customer Support

Please contact the Landis+Gyr Customer Support Team at 888-390-5733 for questions or assistance.

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# **ATTACHMENT E to PSE's Response to PUBLIC COUNSEL Data Request No. 256**



# Customer Service Alert

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## End-of-Sale and Last Time Buy Opportunity

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Subject: Series-4 kV2c Communication Modules End-of-Sale Notification  
Product: Series-4 kV2c Communication Module (45-6100)

### Background

Landis+Gyr will be sunsetting the Series-4 kV2c communication modules for Aclara kV2c meters due to component End-of-Life (EOL) issues (Landis+Gyr part number 45-6100-0003). Landis+Gyr would like to offer a last time buy opportunity to help support and manage immediate customer needs until an alternate product is available.

Landis+Gyr is currently working on enabling Aclara Gen5 kV2c meters with Series-5 technology by 2021. Currently, the Series-4 modules only support the RF Mesh communication protocol; whereas the Series-5 alternative will support RF Mesh and RF Mesh IP communication protocols.

### Action Required

The last time buy opportunity window is effective immediately and expires March 31, 2020. A total of 15,000 communication modules will be available as a part of the last time buy and will be offered to customers on a first-come, first-served basis. Standard lead times apply for orders purchased during the last time buy. Landis+Gyr will also support warranty returns with replacements.

For customers that order Series-4 kV2c meters via Aclara, please reach out to Aclara to place your orders. A last time buy of communication modules have been offered to Aclara to support customer needs.

### Customer Service

Please contact the Landis+Gyr Customer Success Team at 888-390-5733 for questions or assistance.

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