

UE 990473

**Meeting Minutes**  
**Electricity and Natural Gas Rules Review Workshop**

**Breakout Discussion on Electric/Gas Safety; Metering; Engineering Standards**

**June 3, 1999**

**10:45 - 12:00**

Dennis Moss - Facilitator of breakout section. Dennis brought the meeting to order, passed out the agenda, and asked the participants to abide by the ground rules.

Dennis Moss - Presented the First Proposed Rule: **Net Metering**

Doug Kilpatrick - Last year the Legislature enacted a bill requiring utilities to offer net metering to customers who were interested in installing renewable energy systems, (wind, hydro, solar) at their premises, and who wish to sell excess energy back to the utility companies. The size of those facilities is limited to no larger than 25 kW and we actually have it in place for all three of the jurisdictional electric companies. We have tariffs that were put in place in February of this year to allow net metering for their customers. The thought was one of; is it appropriate, or are there issues that were resolved and agreed to during the negotiation of those net metering tariffs, that would be important to put into a rule? Staff has no proposed language at this time, just a suggestion that because we are dealing with Electric rules in general and metering kinds of rules, that it may be appropriate to address net metering.

Dennis Moss - Any comments?

Carole Rockney - PacifiCorp - I don't see a need to make a lot of new rules, and would rather see fewer rules. We feel the issue was covered pretty well in all the tariff filings with net metering content.

Doug Kilpatrick - The thought is that net metering legislation has been enacted in a number of other states and we have not had an opportunity to review what kind of rules have been established by commissions to enact that legislation. I believe the legislation has been primarily sponsored by the solar industry association and is fairly similar from one state to another. There are some small differences between states. The thought is that it may be worth taking a cursory review to see what some other commissions have adopted as net metering, and perhaps propose a rule with similar language. The idea is not to make more rules because we have the opportunity. I agree that fewer is better and that we only make the rules where need be.

Dennis Moss - We might add something where an industry is evolving in a new direction such as this. There may be some other areas where we can eliminate rules that are outdated.

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Lynn Logan - PSE - As of today, we have no applicants or customers under our tariff. It was mentioned that the solar industry pushed this, but the public hasn't responded. I also understand that there is some federal legislation having to do with net metering that is being worked on. It is a good idea to bring it up, but it may be a little bit premature until we actually get down the road and find out what are the real problems, or if there are any problems.

Doug Kilpatrick - I'll make the comment for those who aren't aware what the legislation covers. It is rather basic in terms of legislation and is only two or three pages. It requires the utilities to offer net-metering to customers that meet certain criteria for both the size and supply resource availability and then also that they need to meet requirements established by the IEEE and national electric code, for safety and interconnection. The thought was one of making sure we do establish by rule some specific reference to those other standards. In the legislation they are referred to somewhat generally. There may be more specific language that we may want to make that specifically deals with reference to those other industry standards to make sure that what it allows is uniform across all the industry in terms of what is expected by the customer and what is expected by the utility. It may be something that we can avoid problems in the interpretation down the road if we are a little bit specific about it now.

Dick McCarthy - Do the current net metering rules cover a co-generation situation?

Doug Kilpatrick - The legislation was very specific. It said, if you have a solar, wind, or hydro facility of 25 kW or smaller, but it does not specifically address whether or not that facility also is a co-generation.

Dennis Moss - Any other comments? Let's move to our second subject area which is **Facility Safety**. I have a question about whether there is a corresponding issue on the gas side?

Steve Rieger - I think as far as facility safety goes, what I have seen in the way of operation standards for the gas companies, they have specifically identified areas where they will or will not place meters. What we were looking at in this rule is, do we want to clearly write that into the rule that the gas companies will identify the proper places for placement of meters and so forth, and places that are not appropriate?

Dennis Moss - Would that fall under the meter location rule?

Steve Rieger - Yes, they go hand in hand.

Dennis Moss - So we can discuss that under that rule?

Steve Rieger - Yes.

Dennis Moss - Ok, let's focus on the Electric side.

Doug Kilpatrick - On the Electric side, the reason that this was brought up was my own thumbing

through the various WAC's. I noticed that in the telephone company WAC, there is a reference to the fact that telephone facilities must be built and maintained in accordance with the national electric safety code. There is no similar rule on the Electric side. Why would you not build electric facilities maintaining a national electric safety code? My understanding is that this is basic utility practice, but it doesn't say that anywhere.

Dennis Moss - Does anyone want to speak to the question as to whether we should have a rule that recognizes the need for electric utilities to conform to the national safety standards?

Lynn Logan - PSE - We do follow the national electric safety code, and as far as worker safety, there are already extensive rules under WAC 290 - 645 for safety of electrical workers. We don't see a need for additional rules with this requirement.

Dennis Moss - While you see no need for the rule, is there any objection to having such a rule in place?

Doug Kilpatrick - One of the things I have done, is look at rules from various other states. New Hampshire has one that states a standard practice in construction and maintenance and it references the national electric safety code and the national electric code. Likewise, North Carolina is similar. It says Safety rules and regulations shall be in conformance with national electric safety code. These are general comments, but it seems to make sense that if it is industry practice, that it would just codify it.

Dick McCarthy - Avista - For clarification, one of the things that is kind of odd is that the national electric code states for example, that meter heights shall be between 5 - 7' and there is probably no utility in Washington State that adopts that rule. Because 7' becomes 8' from an electrician's standpoint, and now the meter is too high, so everybody adopts a rule from 4 - 6' which is outside what the national electric code says. You have an example there of saying we'll adopt what the national electric code says for meter locations, which could be meter heights, which is now outside of what the utility business does because the NEC doesn't really address utility issues. So now our rules would almost go swinging back to the national electric code which doesn't really fit the needs of the utilities. The national electric code got out of the clarification of stating 5 - 7', for an electric meter, when it's the utilities that have to put up with the location of that meter. There are two sides there that may not meet when it's time to get the work done.

Dennis Moss - Let me generalize your comment by saying it sounds like there are some standards in that national code to which it is not the practice to adhere. So the simple adoption of a rule that refers to those standards might actually create some problems.

Dick McCarthy - Avista - Correct.

Dennis Moss - Having generalized it in that way, I wonder if there are any others that come to mind that the practice might deviate from those national standards, so that there might need to be some further discussion and development if the Commission is willing to adopt such a rule.

Carole Rockney - But that's a good idea to see if we can go back to see if there are any other issues like that to look into.

Dennis Moss - It sounds like we might need to do some follow up on this in terms of discussion between staff and the industry with respect to particular practices and rules.

Dave Dittmore - I just want to raise an issue. It seems to me the logical progression of this is the liability issue. That if there are certain standards set in our rules, is it valuable to be able to come back and say this follows the state rule. I know I've had questions about what is the rule about cable height? Well, it turns out we don't have a cable rule. Do the companies see a need to have this meter height or voltage codified into a rule?

Dennis Moss - This is a consideration. Rules are intended to set standards, but can also protect the industry. Anything further? The next item is - **Meter Location (086) Electric and (136 & 141)** Would it be appropriate to see if these rules should be combined in some fashion? The general subject matter being the location and identification of meters.

Al Rhoades - Are these rules summarized? There is a comment on WAC 480-90-046 that issues the suggestion that "Gas under no circumstances should be re-metered or submetered by a customer for resale to another or others". This sounds like a suggested rule change. The issue that I'm trying to monitor under the state building code, is there an additional issue with master metering where gas is re-metered or re-sold? The definitions in your rules identify this re-metering individual as a gas company putting the pipeline under the jurisdiction of the WUTC.

Dennis Moss - Is this issue under Consumer Issues?

Steve Rieger - That issue will be addressed this afternoon under consumer issues, but I think you've hit upon a valid point, our group, the Pipeline Safety section has seen quite a growth in identified master meter systems, and we're looking at mechanisms perhaps through this regulation that we could start to control the growth of master meters.

Dennis Moss - Let's reserve discussion until this afternoon. Why don't we turn the focus to the Electric side and talk about zero access meter location. Does anyone have comments?

Doug Kilpatrick - Staff looked at this rule and is interested that it be written in clear, understandable English. I think the only question that we have at this point is that there is a provision that says "meters shall be in a location that is free from vibration, corrosive atmosphere, and abnormal temperatures". I understand corrosive atmosphere and abnormal temperatures, but I don't know if vibration has been an issue in the past, or whether we want to keep that in there.

Dick McCarthy - Avista - A couple of things, the rule 086 definitely says subject to the utility's requirements, and I'm sure that if PacifiCorp, PSE and Avista produced a requirement book for the customer, and it's really very specific about where the meter shall be located, from a door

from a window, back yard/front yard, meter heights. The customer gets a fair amount of information based on this rule as to what's the best way to install the meter and where it should be installed. The second part to that, yes, today we probably have 10% of our meters that are solid state that would not be affected by vibration, but we still have 300,000 out there that would be subject to that. We're not changing our system over in mass, so meters will come back in to be serviced and put back out into location with vibration or away from a door. We try to eliminate having a meter too close to a door, because when the door slams, the gear in the suspension mechanism causes the gears to jam. That little piece there is inherent for us to say no, the meter will not be located that close to a door that will slam. Two issues, I think we cover the locations in the service requirement books under 086, and I still think that a meter free from vibration is still an issue to the metering industry.

Dennis Moss - One of your comments raised to mind a question for me. You mentioned that you suspect that each company has its own guidelines. Are the guidelines standard for all the companies, or do they vary? Should there be some sort of standard?

Dick McCarthy - I think the industry has tried to standardize some of that, like East of the mountains because it's been very awkward for electricians and contractors to find a similar rule between our utilities, the municipalities and the PUD's. We formed sort of an association in the Northwest Electric League, trying to standardize by interviewing the different utilities to find out what was the common meter height. (4 - 6'). I know that dealing with the meter group on the West side, they have tried to get together to do a similar thing - make rules a little more common so that as electricians and contractors go between jurisdictions, they will be working under a common set of rules. That is trying to be done.

Dennis Moss - Would it be useful to have follow up discussion on this subject so that staff might fashion a rule that would encompass the standards for the industry that might actually promote and facilitate your operations?

Dick McCarthy - I'm trying to remember why that started over here. I thought it was something to do with almost like a Commission request or a customer complaint, stating we need to standardize this a little bit better.

Dennis Moss - Do any of the representatives think this would be a useful undertaking?

Lynn Logan - PSE - I would have to check on that to find out what the status is. I know one of the issues that came up in the past was standardizing residential meter bases.

Carole Rockney - I assume we're doing the same as other utilities, but maybe that's a dangerous assumption. Given that we're in multiple states and I think we try to conform for all of our states to do things in a similar way. I would hope that we're doing things similar to the Washington utilities, but we should probably take a look at that.

Doug Kilpatrick - One of the other issues that staff did discuss internally had to do with location, specifically with regard to proximity to gas meters or windows/doors/overhangs. If you have

both gas and electric, you would normally want to locate those meters somewhat adjacent to each other for ease of meter reading, but you don't want to have them right on top of each other.

Dick McCarthy - Our service requirement follows what the DOT rules are. We have a three foot separation between the gas and electric meter and we also have the separation designated between vents that are coming into the house. Those openings are also specified in our service requirement book for meter installation on the gas side.

Dennis Moss - We've focused for a few minutes on the Electric side, let's move quickly to the Gas side. Is there an interplay between gas and electric. Are there any issues in that regard?

Steve Rieger - When we looked at these rules for meter set assembly and location, we're looking toward an industry wide standard for the placement of these. As I mentioned previously, looking at operation and maintenance manuals, we do see standards identified per company. Sometimes there are many similarities, other times there are difference. At this time, we're looking just to clean up the language to make it more clear, so that there is a consistent standard that is followed throughout the state.

Dennis Lloyd - With regard to whether the meter should be located outside the building at all times in an accessible location; in an emergency it can be accessed to discontinue gas service and also for third party damage as far as locating positions, and for marking and excavation purposes.

Dennis Moss - Any other comments? Let me just summarize briefly by saying, that based on the comments that I've heard, it strikes me that this is an area where there could be some follow up in terms of discussions with regard to the possibility of some standards that might be written into a rule for both the gas and electric side. I see some nods of agreement with that idea, so I think we can identify this as secondary. I'll go ahead and interject here that one thing we can do toward the conclusion of our breakout session is exchange information about the appropriate contact people for these follow up discussions. The next rule on the agenda is **Meter Charges, 121 - Electric and 131 - Gas.**

Dick McCarthy - Avista - We used to enforce the rule where the customer shall only have one meter per building or customer. The national electric code changed several years ago that allows multiple services to a building. We found that what was happening to us is that we were being beat up in a sense by the national electric code and the local inspectors, that says the code allows a second point of service, why don't you allow a second point of service? This would be on extra large services or buildings. Because the rulemaking process said we could not charge for metering, does it make sense to not be able to charge for the second meter that was installed at the customers convenience or request.

Dennis Moss - Any other comments - How about the Gas side?

Steve Rieger - One of the concerns we had with this regulation was that the very last sentence stated that "no meter shall be required on flat rate services". One of the questions I have asked

some of the companies is - Do any of the companies do flat rate services with gas at this time? Is this portion of the regulation still necessary, or can we get rid of it at this time?

Dick McCarthy - We have no flat rates that we're aware of on the gas side at Avista.

Lynn Logan - PSE- We have some existing flat rate street lights. On the electric side, we have flat rate electric where the usage is constant, where cost of metering is much cheaper this way.

Dennis Moss - Anything else? Cascade had commented on 131 on the gas side, which is where we're focused right now.

Barbara Groff - Cascade - This is on page 36 of the gas packet. I'm not with that department, I haven't spoken with anyone who proposed this wording, so I can only say what they said in the comments. We wouldn't be charging the customer for the meter, but it's part of the rate case, and part of the capitol investment.

Dennis Moss - Is this more of an accounting issue?

Dennis Lloyd - The issue is the responsibility of operating the system downstream to the second meter. Is that an issue that should be addressed?

Barbara Groff - I don't think it's really discussing more than one meter or a second meter, it's just changing slightly the wording that we wouldn't charge for an initial service, but it is part of the whole cost that goes into it. I think it may be an accounting issue.

Dennis M. - I think in that connection, since the accounting is in the other breakout session. It would be important to point this out to Jim Russell, and let him know we didn't get into it this morning.

Ed Finklea - Energy Advocates - Where do we cover in current rules other than the gas utilities own tariff, the provision of Telemetry? Transportation customers of gas companies have a telemeter in order to keep track of daily consumption. Is it covered in the rules, or is it simply covered in the transportation area?

Dennis Moss - I'll ask staff to respond to that.

Dennis Lloyd - As far as pipeline safety, there is a requirement for gas companies to do some telemetering and would fall under WAC 480-93 under Gas safety operations. The issue is should it be addressed here as well?

Ed Finklea - The telemetry I was speaking of is what a specific customer would have at their facility in order to coordinate their nominations. Some utilities require it, and there have been issues about whether that meter can simply be owned by the customer or does it have to be leased from the utility?

Dennis Moss - It sounds like your concern is that this subject matter may not be adequately addressed in the rule. Is that correct?

Ed Finklea - It strikes me that the utilities to local distributor tariffs are more specific than the rules. This may not be a problem, but there have been questions since the advent of transportation surveys about who owns those meters. Can I go to Radio Shack and buy one, or do I have to purchase month to month from the utility?

Dennis Moss - This sounds like one of those issues where there have been some changes in the industry, some changes technologically and in the structure of the industry that might call for some investigation. There might need to be some new rule language or perhaps even a new rule to cover this specific issue. Again - Follow up is needed.

Dick McCarthy - Avista - I think that same thing is happening to us where customers are requiring a KYZ pulse, or they want a phone modem with mass memory so they can dial up usage. I think PacifiCorp addressed that as a tariff language or charges, and I think that's an area that should also be looked at in listening to what Ed just said. As that changes and those customer requests are above and beyond normal metering issues, I have a tendency to look at that and say you would pay more above and beyond what other customers get.

Dennis Moss - Now is that on the Electric side?

Dick McCarthy - Yes, similar issue.

Doug Kilpatrick - Dick, I would ask the question about maintenance of meters, if the utility owns and leases to the customer with a monthly charge, then clearly the utility is responsible for maintaining accuracy of that meter. If the customer owns the meter and if it's being used for billing purposes, how are we assuring ourselves that its accuracy is being maintained?

Dick McCarthy - Exactly, I think that is a concern with today's deregulation industry from the metering standpoint. Is the expertise behind that, and I think for everyone that has looked at the California situation, it has probably come out very scary from the measurement standpoint on who's going to do that maintenance, and where are those people going to be tomorrow or next year?

Dennis Lloyd - Certainly staff would have a concern about the multitude of potential operators, such as leak surveys, corrosion control and those kinds of issues.

Dennis Moss - So meter ownership and responsibility for maintenance and accuracy and related technical issues is an area that needs to be looked into. Perhaps it's not encompassed squarely in the rule. This brings us rather naturally into the next area on our agenda which concerns **accuracy of meters on the electric 136 and gas 146**. I have starred these as they go along with 141 and 146 and should be discussed as a set.



Doug Kilpatrick - There were two thoughts here that staff had with regard to this. The first was, is there a possibility that we could reduce the total number of rules by combining some of these? Since they're talking about accuracy of meters, initial accuracy and ongoing accuracy of both watt hour and KW meters. We just thought about the possibility of combining the language essentially as it is, but putting it in a single rule. It would be easier to find that way when you're looking at it. The second thought was, and this is one that staff would really like to hear from the industry on is whether or not the accuracy levels that are specified in the current rules should be changed at all. Are there any technological changes that have happened since 1971 when these rules were last reviewed, that would allow us to say that the accuracy levels maybe should be increased?

Dick McCarthy - Avista - I don't see a problem with combining that into a single rule, and similar language rather than have it spread throughout the rule. Addressing the issue of technology, this was addressed when we talked about the initial accuracy of the meter in 136, "The meter shall be as close to zero as is practicably possible". I think that's where we try to buy from the manufacturer, that's when we try to calibrate in house. No matter whether you state the rule as 2% + or -, that's not where we operate. We probably operate at 2/10ths + or -. I think in house the utilities I deal with all have that same philosophy, to run as close to zero as possible.

Doug Kilpatrick - The question is, if it is common practice for the utilities to run less than 1% + or -, should the rule reflect that? My only concern here is in terms of ambiguity. Rules should be fairly specific. If we say it should be as close to zero error as possible, one person's idea of close may not be the same as another's idea.

Dick McCarthy - The industry's reference is the American National Standards Institute (ANSI) standards for electric metering. The utilities and the manufacturer are specified in that ANSI standard. I think it's (C12), that would probably be a good reference to look at, and it's accuracy levels are classified there as types of meters, and construction of meters. That way, if there was some reference to an ANSI standard, the ANSI standard continually improves, rather than build a rule here that is out of date five or ten years from now.

Lynn Logan - PSE - I don't have any big problem with combining the rules, but it's similar to when you go to the grocery store and they've put things on different shelves, and you can't find them anymore. So everybody in the industry, and all the customers that are used to looking at these rules aren't going to be able to find them. As far as changing the values on the percentages that we operate under, I think the + or - 2% even with bills at the level they are today, is not a significant dollar amount. We're talking about in service meters that may have been in service for 20 or 30 years, not just new meters. If we want to have a different standard for new meters, I don't think that would be a problem.

Carole Rockney - I agree with Lynn with regard to some of the older meters not having the same standard as some of the newer meters. It could be a bit tricky, so maybe having a little more flexibility, I don't know if it's 2%, maybe it's 1%. I think the people that know this facet should look at that.

Dennis Moss - Ok, and really we have issues here with respect to the initial accuracy of meters, which would seem to cover the new subject, whereas we have ongoing accuracy under the other rules. So there is some separation now. As I understood the suggestion of putting this into one rule, that would not eliminate creating a distinction between initial and ongoing accuracy. Is that correct?

Doug Kilpatrick - That is correct. Staff's idea was to simplify things when you go looking for it. I've noted your comment Lynn about being able to find what you used to be able to find. We're also trying to change the table of contents to make it plain what's in there, and also to make the titles more descriptive to ease finding things. Clearly the other issue was not elimination of any of the components of initial verses on-going accuracy, but just a combination. We'll weigh those factors together, and if it seems to be problematic, we can stay with three rules.

Dave Dittmore - The idea would be to get a parallel numbering system. For example, the gas rule is 146 and we have 136 and 141, which could be combined into one rule.

Dennis Moss - Let me interject that as the process continues, and as staff prepares proposed rules or drafts, part of the effort will be the clarification aspect of this process, which is both in terms of writing the rule for clarity, but also for organizing the rules and perhaps making some adjustments there. We are now allowed to do something we weren't previously allowed to do in Washington State which is actually having headings and sub-headings to break things into logical components. As you participate please comment on those aspects as well. If something is out of place let us know.

Lynn Logan - PSE The + or - or 2 % on an in-service meter to go out and test it for a customer ties into customer service issues. If we lower that to 1% then we're going to be changing people's bills and having to correct their bills for past periods. I wouldn't want to feel obligated to back bill someone for 1% difference on a residence, when you're talking about the cost of calculating those bills being much more than the 1% difference.

Dennis Moss - If I'm hearing you correctly, there may be an interplay between some of these technical metering issues and some of the accounting issues. Those need to be considered and taken back to the accounting side, so we'll rely on staff to coordinate these issues. Let's move to the next subject: **Electric Side 186 - Standard Frequency.**

Doug Kilpatrick - The issue here is that the current rule says "each utility will adopt a standard frequency". One would assume that each utility could have its own frequency, which I don't believe is physically possible in an interconnected system. Our proposal here would be to reference a 60 cycle frequency as the standard used in North America. There is also wording about variations of frequency under normal operating conditions. We had the thought that perhaps we should reference standards by the Western Systems Coordinating Council or the appropriate regional body. Staff is looking for industry input on this. How would we describe what would be normal variations that would be allowed. The second part has to do with frequency variations that have to do more with power quality problems. I wanted to raise the

awareness of those folks that were here that the Commission staff has received a go ahead from the Commissioners to look at development of some power quality rules. This will be a separate activity that will take place this summer or fall, and will be a similar process to this one.

Mark Anderson - We met with the Commissioners last Thursday. They gave us the go ahead to initiate a new rulemaking with the development of a reliability issue. There are at least two rules we are considering under the current rulemaking which is the frequency that we're looking at now, and then. I believe it's the variations in voltage that is next on the list. They may be affected by this reliability rulemaking so we've been talking to staff about whether we should make changes now and then go through the entire reliability rulemaking process to see if there have been changes and whether we should let these two items sit and then address them in the reliability rulemaking process. The reliability rule will cover potentially greater issues than voltage and frequency.

Dennis Moss - So one of the items I hear on the table is the question of whether the adoption of 186 & 191 should continue to be the subject of concern in this rulemaking, or whether those should be reserved for another rulemaking. Can we get comments on that as well as comments on the substance of the concerns that have been expressed?

Carole Rockney- PacifiCorp. - I think it makes sense to hold the discussion of the changes to these rules until the reliability rulemaking. I think they relate to the subject matter that will be discussed with that docket. I don't know if that's an issue for the Commission. If you hold discussion on these two items, and you want to discuss them later or not.

Dennis Moss - Let me define the process parameters. There are really two options. One is that rules 186 & 191 could be considered within the scope of this rulemaking process, and they could be considered for a limited purpose of clarity, and then re-open as part of a separate process. My recollection is that you can't have the same rule open simultaneously in two, so there may be some timing implications. We would have to consider those and I don't know the answer to that off the top of my head. Any other comments?

Dick McCarthy - My concern is that our people with expertise in that area aren't represented here today.

Lynn Logan - I concur with Dick.

Dennis Moss - Mark do you have any insight on the timing yet?

Mark Anderson - It's fairly early, we're talking about late August or early September to initiate the process, and the CR-101 that we would file would be similar to a notice of inquiry, at least that is our expectation at the moment. We're not coming forward with a proposed rule, but a list of issues with the intent to have workshops such as this to discuss it.

Dennis Moss - It may be appropriate to talk about removing these from this rulemaking. Further

comments? The next item for discussion is **Gas Issue 480-90-100 - Quality of Gas**

Kim West - Looking at the rule, the first thing I notice is the organization of it. It's supposed to address the quality of the gas. The other thing is the idea of odorization. It seems to be out of place in this rule. Any ideas?

Dennis Moss - The question is on the table. Should odorization be in this rule, or in a safety rule?

Dick McCarthy - I agree odorization doesn't fit in this category.

Dennis Moss - I think the suggestion was that this might be a separate item under the safety rules.

Dick McCarthy - Yes

Ed Finklea - Isn't the odorization done at the pipeline? Don't the LDC's receive odorized gas from Northwest Pipeline?

Steve Rieger - The transportation companies, the major interstate companies transport odorless gas. The LDC's are responsible for odorizing gas. Another set of regulations, WAC 480-93 identifies odorization so perhaps this is an inappropriate place to put this. Also as a side note to this regulation, this seems to be more of a glossary of terms and really doesn't define what the quality of gas is. Should that be tied to an industry standard? The major interstate pipelines do put out a daily list of what the gas is, the parameters, the quality of gas they ship on a day by day basis. Would it be more appropriate to tie into something like that.

Carole Rockney - We don't do gas, but what he said made sense, and I agree with that.

Dick McCarthy - It is written oddly, more glossary terms than defining gas. It will take a little more work to look at this to sort it out the way it should go.

Dennis Lloyd - I would like to bring out that this rule applies to public service companies, whereas our safety rules apply to all gas companies. I would ask that you take a look at it in terms of those parameters.

Dennis Moss - You're saying the safety rules are more broad. Am I correct in understanding that one direction the suggestions are taking is the possibility of removing this odorization requirement from this rule? Would that raise a concern in your mind if that subject matter is then covered in the safety rules which are broader?

Dennis Lloyd - We're talking about the quality of gas as well as the odorization. As Steve Rieger has pointed out, typically the interstate companies primarily monitor the quality of gas. However, it's an important safety issue for local distribution companies to be aware of the

quality. On the odorization side, it is something that has to be monitored by local distribution companies, as well as the injection. It is a pipeline safety issue for all companies and I wouldn't have any concern with this being relocated to the safety discussion.

Lynn Logan - I'm not real familiar with the gas operation side of our business, but the title of the rule was misleading to me when I first looked at it. Maybe that would clear it up to make the glossary approach make a little more sense. The requirements that are brought forth in this rule should be that the LDC is responsible for determining the quality of the gas that they are selling. The rule doesn't seem to address the quality issues very well.

Dennis Moss - It looks again like this needs to be looked into further with the accounting and consumer issues. Any further comments? The next subject is: **126 & 156- Meter**

**Reading** Are there any comments with respect to the substance or clarity?

Lynn Logan - PSE - The rules shouldn't be grouped together again for the same reason as the grocery store, but we're dealing with different pieces of equipment, and I think it's clear to keep them separate. We're dealing with test constance, etc, and they should not be combined into a single rule.

Dennis Moss - I'm a little confused, I'm focusing on 126. Since we're discussing both 126 & 156 the suggestion is that these are different subject matter and should not be combined. Any other comments? Anything on 156 individually? Let's discuss **176 Statement of Meter Test Procedures.**

Lynn Logan - PSE - This is dealing clearly with test standards and portable indicating instruments which are different pieces of equipment, and it is more clear to keep them separate. There is no need to combine them.

Dick McCarthy - I have to agree with Lynn, these are separate issues; portable indicating instruments and determining the quality of service which is 161 vs 201 which is the accuracy of test standards for testing watt hour meters. Those are two different items, even though the staff made them look like they were the same in the comment. Also 176, the Statement of Meter Test Procedures which we file, so I think they are rather distinct and separate. The rules are rather spread out from 161 to 201 and you have to look everywhere to try to locate them. I can see the similarity to them in a closer proximity to the rule, but the way it is written they would have to be distinct.

Dennis Moss - So you see here a possible reorganization might be necessary, but maintaining the sections to preserve the integrity of the subject matter that each addresses.

Doug Kilpatrick - Our thought was noting that there are differences here and wanting to keep the distinctions there. As you mentioned, these are spread all over the place, and could be brought together more logically. Our intent was not to blur the distinction between test standards and

portable indicating instruments, but rather to group them where you can logically find them. It may be using subheadings that might give us the ability to do that.

Dennis Moss - Anything else on that? The next item is **181 - Meter History Records**. Any comments?

Lynn Logan - PSE - We didn't see where there was a need to do anything here, we're in the process right now of completing a new billing and meter history system that will be very much like our old one. I would like to hear from staff what they felt the problems were.

Doug Kilpatrick - The only issue was one of a lay person being able to read this and understand what it meant. I think our intent was not to make any substantive change, but merely to make it more understandable.

Dick McCarthy - We comply with that 100%. We have a computer system that does track the meter history from the time of purchase until the time of retirement, plus a year or so. The intent is easy, we already follow it and agree with clarifying the language only.

Dennis Moss - **151 Instrument Transformers**.

Doug Kilpatrick - Again staff's intent is to make sure this is understandable and written clearly. We would ask generally the question of industry staff, do these accuracy points that are mentioned in here meet with what you currently do or the current equipment that you're buying, and if there's any need for a change that you folks know of? I think that would direct any kind of change that we would consider making.

Lynn Logan - PSE - Our metering people didn't see a need to change the rule.

Dick McCarthy - Avista - We were of the same frame of mind. The word that got me was to reflect updated technology. The instrument transformer is still made the same way it was 30, 40, 50 years ago. There have been no changes as compared to the meters which have become more accurate. I see no need for changes other than if there happens to be some language clarification.

Carole Rockney - PacifiCorp - We agree with that, we don't see a problem with it, but we'd be happy to look at the statistics to see if they are applicable.

Dennis Moss - If you have some follow up on that to communicate to staff, that would be helpful. The next subject is: **161 Portable Indicating Instruments**

Doug Kilpatrick - Again, as indicated previously, the only interest that we had on this one was making sure that whoever was looking in the rules could find what they were looking for. It was certainly not to blur any distinction between portable instruments and bench standard reference instruments. We also wanted to make sure the wording was understandable.

Lynn Logan - PSE - I have a question. Is it allowed to cross reference one rule in another rule?

Dennis Moss - Yes it is.

Lynn Logan - Maybe that would be helpful to see a cross reference to a related rule.

Dick McCarthy - The only comment I have, I don't know when this language was written, but there has been a remarkable increase in accuracy and length of accuracy that an indicating instrument can maintain these days. I think we were looking at a lot older type instrumentation when this rule was written compared to fluke instruments today that are almost bullet proof. If there was a chance to clarify some of that, we'd be willing to participate.

Dennis Moss - Ok, and to just answer directly, these rules were last revised in 1971 and so there has been just a little technological development since then. Anything else on this? The final subject is: **206 - Reports of Accidents**

Doug Kilpatrick - Currently there is a rule about accident reporting and we have a procedure that we've put in place, and we've talked with the jurisdictional utilities about doing it on the Electric Side only. Our thought was to make it plain in the rule what we're doing in common practice with regard to what's being reported. Staff's suggestion here would be to enumerate some of those pieces of information that we're routinely asking for and receiving from the companies to make sure that it's clear for everybody.

Dick McCarthy - Our safety people are not here, but follow up with them would be appropriate.

Lynn Logan - PSE - I spoke briefly with our risk management people, and they are the ones that handle reporting to the Commission now. They didn't see a need to make changes, they feel the information they are providing now is acceptable.

Dennis Moss - I'll just comment on this regard, one of the principles we follow in developing rules in a state agency is that the rule should reflect the policy and practice that is currently followed. This would be a concern, and as I understand the comment, it is not to expand the required set of information, but clearly to reflect what is the practice in the industry.

Lynn Logan - Our Risk Management indicates they have no problem with what's going on now.

Dennis Moss - In terms of defining that specific set of criteria then there can probably be some follow up with the appropriate personnel at the companies.

Carole Rockney - Doug, I'm not sure what we don't provide. I think that the rule covers everything. What I've seen that might be missing is the date, I suspect time means time and date, but maybe we could clarify that. I don't think we provide any more than what is written.

Doug Kilpatrick - I can't recall what the nuance was, but it was very small on this and again it

was a matter of trying to make sure we were clear for everyone about what was required. I think that I did have an idea about something of a minimum time frame for making the report. I don't believe it says so in here. It just says prompt notice to the Commission, and again it was an issue of clarity, what does prompt mean? We are getting prompt notice from the companies, but if we were to specify two business days or whatever the current practice is.

Carole Rockney - I don't see any objection to that, we do that now, and it would help clarify the rule.

Dennis Moss - This concludes our list. Are there any other issues/comments/questions that haven't been discussed?

Lynn Logan - We had commented on WAC 480 -100- 076 - Service Responsibilities, and when will this be addressed?

Graciela - This afternoon with consumer issues.

Dennis Moss - If you feel that is not the appropriate place to discuss the issue, please let us know.

Dick McCarthy - Avista - We brought up an issue about a flat rate, on the Electric side, where "we shall not permit". I think it's more appropriate in 100-046, it falls in with Application of Service, but it was somewhat of a technical issue, the last sentence said, "Electric service shall be resold to a customer, unless specifically authorized in the filed tariff of the utility". I think I addressed it in the letter and we only control the equipment up to the meter. What the customer does after that is beyond our control. I think this is more of a technical area than a general one. I was wondering if anyone else had looked at that, or had any issues with that?

Lynn Logan - PSE - The problems have been fairly minor, and I just have to make a call to the person re-selling the energy and explain to them that they don't really want to be a utility, and it usually takes care of the problem.

Dick McCarthy - Our concern was if a customer does it after we finish our work, they could do it six months, or a year later.

Doug Kilpatrick - The comment I would make is similar to what Lynn stated with regard to how we have dealt with those questions. We've used the rule as an ability to indicate to folks that it is generally not permitted to re-sell either gas or electricity, and that if they want to re-sell, then they are putting themselves up as a public utility company and would be subject to jurisdiction by the Commission. That's kind of what we've used the rule for. I definitely understand the problem of one of beyond the responsibility of utility, and what do you do years later?

Dennis Moss - Is the suggestion that there should be some consideration given to breaking this out from the application for service rule, or am I reading too much into your comments?



Dick McCarthy - My concern is, where do we stand with the Commission if it came up that we'd found some business had sub-metered your electricity after our meter and we said we didn't know anything about it. The Commission rule says we should not allow it, but how do I not allow it when I don't know what happened?

Dennis Moss - Is this a practical problem for you, or is this something that the Commission should consider?

Dick McCarthy - It does happen, and I think the way it happens is bad information from the contractor or electrician. You may have a large building with one meter because it was a large warehouse or whatever and then someone buys it and wants to break it down, and somebody has come in and given them a bid and said well, if you want to put in meters for the utility, it's going to cost x amount of dollars, but I can put in these meters that I can buy at Radio Shack in afterwards, and you'll be ok, and you can just bill those customers out yourself. You see, we weren't involved in that, and yet the Commission rule says we shall not allow that, but we may never be involved in that.

Dennis Moss - Your concern is that you may find yourself in violation of this rule, under circumstances that are beyond your control?

Carole Rockney - We don't have this problem, and we let people know this isn't what you do. I didn't view this as applying to the utility, I thought this was a message to customers that this isn't something that you can do. I didn't think it was up to the utilities to police it.

Dennis Moss - I think at the minimum, we've identified an ambiguity that needs to be resolved.

Doug Kilpatrick.- My personal interpretation is that this has been used as a message to the customer, rather than as some problem to the utilities. We have seen this in situations sometimes with modifications to older facilities, and some older apartment buildings that have submetering in them, trailer court facilities and marinas.

Steve Rieger - Under WAC 480-90-076 - Service Responsibilities. There is a paragraph in there that refers to customer responsibility. Perhaps that paragraph should be moved to 046 Application for Service to very definitely emphasize to the customer that they are responsible for things prior to service and with ongoing service. This will be discussed this afternoon as well with the Consumer issues.

Dennis Moss - This meeting will resume at 1:30 in room 206. As we break up, I'd ask that you get together with Doug and Steve and exchange business cards to make arrangements to follow up on some of the issues we've discussed today. Good meeting, productive. I appreciate your comments.