



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

December 21, 2018

**NOTICE OF OPPORTUNITY TO FILE WRITTEN COMMENTS
(By 5 p.m. on Thursday, January 31, 2019)**

**NOTICE OF PUBLIC COMMENT HEARING
(Set for Thursday, February 21, 2019, at 6 p.m. – UTC Headquarters)**

**NOTICE OF WORKSHOP
(Set for 9:30 a.m. on Wednesday, March 13, 2019)**

Re: Rulemaking to modify existing consumer protection and meter rules to include Advanced Metering Infrastructure
Docket U-180525

TO ALL INTERESTED PERSONS:

On July 10, 2018, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to modify existing consumer protection and meter-related rules to accommodate regulated utility deployment of Advanced Metering Infrastructure (AMI) technologies. The Commission filed the CR-101 in Docket U-180525.

On the same date, the Commission issued a Notice of Opportunity to File Written Comments. As of September 10, 2018, the Commission had received 11 responses to its July 10, 2018 Notice. Responses were received from: Avista Corporation, Northwest Natural Gas Company, Washington Jural Assembly Members, American Civil Liberties Union of Washington, The Energy Project, NW Energy Coalition, Cascade Natural Gas Corporation, Pacific Power & Light Company, Public Counsel, Puget Sound Energy, and one member of the public (Sammamish).

The Commission now invites the utilities, stakeholders, and the public to provide feedback on its informal draft consumer protection and meter related rules, additional questions for consideration, and invites interested persons to participate in a public comment hearing and subsequent workshop.

QUESTIONS FOR CONSIDERATION

The Commission requests feedback on its informal draft rules provided as Attachment A to this Notice, and the additional questions as provided below.

AMI Meter testing and accuracy requirements

1. What types of certification are available for meters?
2. How is meter accuracy tested?
3. Are there concerns related to power quality that could affect performance and accuracy of the meters?
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?
 - 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?
 - c. Does the company know if the meters have been tested for current waveform distortion caused by LED, CFL, and dimmers?
 - d. Are meters tested in their capability to measure accurately under distorted waveform conditions?
5. Has the company considered adopting standard ANSI C12 – Smart Grid Meter Package? Please provide the rationale for your response.

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.
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?
 - b. What are the disadvantages of this limitation?
 - c. Should Washington restrict disconnections during cold weather? If so, describe alternative policy recommendations.
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?

- a. Does the utility have a policy to temporally 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)?
 - 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.
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?
10. Do you currently reconnect service 24 hours a day, seven days a week? If not, what is your practice?

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?

WRITTEN COMMENTS

Written comments in response to the Notice must be filed with the Commission no later than 5 p.m., Thursday, January 31, 2019. Pursuant to WAC 480-07-250(3), written comments must be submitted in electronic form, specifically in searchable .pdf format (Adobe Acrobat or comparable software). As provided in WAC 480-07-140(5), those comments must be submitted via the Commission's web portal at www.utc.wa.gov/e-filing. If you are unable to submit documents via the portal, you may submit your comments by email to the Commission's Records Center at records@utc.wa.gov or by mailing or delivering an electronic copy to the Commission's Records Center on a flash drive, DVD, or compact disc that includes the filed document(s). Comment submissions should include:

- The docket number of this proceeding (U-180525).
- The commenting party's name.
- The title and date of the comment or comments.

The Commission will post all written comments on its website at the following URL address: www.utc.wa.gov.

If you have questions regarding this rulemaking, you may contact staff leads, Bridget Feeser, at (360) 664-1111 or by email at bridget.feeser@utc.wa.gov, or Greg Kopta, at (360) 664-1355, or by email at gregory.kopta@utc.wa.gov.

PUBLIC COMMENT HEARING

The Commission now established the time and place for public comment hearings to provide members of the public with an opportunity to present oral comments to the Commission.

NOTICE IS HEREBY GIVEN That a public hearing in this matter will be held on Thursday, February 21, 2019, beginning at 6 p.m., in Room 206, Richard Hemstad Building, 1300 S. Evergreen Park Drive S.W., Olympia, Washington.

STAKEHOLDER WORKSHOP

In addition to filing written comments, interested persons are invited to attend a stakeholder workshop on **Wednesday, March, 13, 2019, beginning at 9:30 a.m., in Room 206, Richard Hemstad Building, 1300 Evergreen Park Drive S.W., Olympia, Washington.**

The Commission's teleconference bridge line will be available for the workshop. The Commission prefers and recommends that interested persons participate in person and share ideas in a workshop setting. However, if this imposes a hardship, interested persons may participate at the workshop via the Commission's teleconference bridge at (360) 664-3846. The conference bridge is limited to 22 access lines.

Stakeholders will have further opportunity for comment. Information about the schedule and other aspects of the rulemaking, including comments, will be posted on the Commission's website as it becomes available. If you wish to receive further information on this rulemaking you may:

- 1) Call the Commission's Records Center at (360) 664-1234.
- 2) E-mail the Commission at records@utc.wa.gov.
- 3) Mail written comments to the address below.

When contacting the Commission, please refer to Docket U-180525 to ensure that your placement on the appropriate service list(s). The Commission's mailing address is:

Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

NOTICE

If you do not want to comment now, but do want to receive future information about this rulemaking, please notify the Executive Director and Secretary in one of the ways described above and ask to be included on the mailing list for Docket U-180525. If you do not do this, you might not receive further information about this rulemaking.

MARK L. JOHNSON
Executive Director and Secretary