



201 South Main, Suite 2300
Salt Lake City, Utah 84111

February 18, 2013

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111

Attn: Gary Widerburg
Commission Secretary

RE: Advice Filing No. 13-03
Electric Service Regulation No. 7, Metering
Electric Service Schedule No. 300, Regulation Charges

The purpose of this filing is to provide an accommodation for a customer who does not wish to have the company's current standard metering device installed at their residence or attached to their home. In 2007, Rocky Mountain Power ("Rocky Mountain Power" or the "Company") began a project to replace its then standard meters (analog meter in most locations) to its new standard, mobile automated meter reading (AMR). This project brought numerous benefits to Rocky Mountain Power and its customers through improved meter reading accuracy, reduced meter reading costs, and reduced safety hazard exposures for employees, to name a few. The new standard meter, Automated Meter Reading, or AMR, provides one-way communication transmission of the meter reading to a mobile device located in a vehicle which drives along the meter reading route each month to read the meters for billing purposes. The project was completed in three phases, with the third and final phase completed in 2011.

A limited number of customers have objected to the use of a meter with communications capabilities, expressing their belief that the radio frequency of the meter may be harmful to their health. Although Rocky Mountain Power does not believe the radio frequency of the metering device causes harmful health effects, and research results provided by the Federal Communications Commission (FCC) do not support their assertions, the Company respects the beliefs of the concerned customers and proposes the following accommodation. Specifically, Rocky Mountain is proposing that a customer may choose an accommodation of:

- (1) meter relocation; or
- (2) changing the meter to a non-standard meter requiring manual meter reading; or
- (3) a combination of meter relocation and changing the meter to a non-standard meter requiring manual meter reading.

Rocky Mountain Power's current tariffs allow for a customer to relocate the metering facilities under Regulation 12. Rocky Mountain Power is proposing to also include this information within Regulation 7, Metering, as a new paragraph 2, Non-Standard Metering Accommodation. The costs to the customer for the meter relocation work will vary based on the specifications of each site, however, they generally will include the labor associated with removing the existing meter and installing at the new location, removing the service conductor from the old location

and installing service conductor to the new location, and although unlikely the cost to relocate primary voltage conductor and a transformer. The average charge to the customer for the work performed by Rocky Mountain Power for a simple residential meter relocation is \$500.00. The customer will also be responsible for providing a meterbase, and depending on the specific relocation may be required to provide conduit, meter pedestal, riser with weatherhead, meter pole, or easements.

Also included within this new paragraph 2, is a manual meter reading accommodation that allows a customer to have a non-standard meter (non-radio frequency meter) installed and manually read on a monthly basis. The customer would be assessed an upfront, one-time charge, of \$252.00 for the setting and removal of the non-standard meter. This charge is based on the meterman's average time for installation and subsequent removal of the non-standard meter at some future date, average travel time, and average meter testing/restocking of the removed meter, totaling \$202.35; and the incremental invoiced cost of the non-standard meter, totaling \$49.94. A monthly charge of \$22.00 would be assessed for a metering representative to be sent to the home each month to manually read and input the meter reading into the billing system. This \$22.00 is based on the average time to read the meter and average incremental travel time. The work papers containing the calculations supporting these charges are included with this filing.

Additionally, as a housekeeping matter, Rocky Mountain Power is proposing to eliminate the charge referred to as "Monthly meter rental fee" listed under Special Services section of Schedule 300. This charge is no longer used.

Enclosed for filing are an original and two copies of proposed tariff sheets associated with Tariff P.S.C.U No. 49 of PacifiCorp, d.b.a. Rocky Mountain Power, applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405D, Rocky Mountain Power (the "Company") states that the proposed tariff sheets do not constitute a violation of state law or Commission rule. An electronic copy of the work papers supporting these charges is included with this filing. The Company is requesting an effective date of April 1, 2013 for these changes.

First Revision of Sheet No. 300.3
First Revision of Sheet No. 7R2

Special Services, Non-network meters
Meters

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

By E-mail (preferred):

datarequest@pacificorp.com

By Regular mail:

Data Request Response Center
PacifiCorp
825 NE Multnomah Blvd., Suite 2000
Portland, OR 97232

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Informal inquiries may be directed to Barb Coughlin, Director of Customer & Regulatory Liaison, at (503) 331-4306.

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation & Government Affairs
Enclosures