



GARY R. HERBERT  
*Governor*

GREG BELL  
*Lieutenant Governor*

State of Utah  
DEPARTMENT OF COMMERCE  
Office of Consumer Services

MICHELE BECK  
*Director*

To: The Public Service Commission of Utah

From: The Office of Consumer Services  
Michele Beck, Director  
Danny A.C. Martinez, Utility Analyst  
Cheryl Murray, Utility Analyst

Copies To: PacifiCorp & Rocky Mountain Power  
Barb Coughlin, Director of Customer Service & Regulatory  
Liaison  
David Taylor, Manager of Regulation

Division of Public Utilities  
Chris Parker, Director  
Artie Powell, Energy Section Manager

Date: March 13, 2013  
Subject: Docket No. 13-035-T03, Customer Accommodation for a Non-Standard Metering Device

### Background

On February 19, the Company filed Advice Filing 13-03 with the Public Service Commission of Utah ("Commission") outlining three non-standard accommodation options for customers who believe that the Company's standard automated meter reading or AMR meters are causing health problems. These options are:

1. Meter relocation
2. Changing the meter to a non-standard meter requiring manual meter reading
3. A combination of meter relocation and changing the meter to a non-standard meter requiring manual meter reading.

### Discussion

The Company indicates in its Advice Filing that a limited number of customers object to the use of a meter with communication capabilities as a health risk. The Company proposed options to alleviate these customers' concerns. In previous discussions with the Company and the Division of Public Utilities ("Division"), the Office of Consumer

Services ("Office") supported the concept with the agreement that costs associated with the accommodation were incurred solely by the customer seeking the accommodation and not other ratepayers. Each option proposed by the Company costs approximately the following:

Option 1– Meter Relocation: this option already exists within the Company's tariff, as described in section 6 of Electric Service Regulation No. 12. The Company has indicated that relocation costs about \$500.00 on average.

Option 2 – Exchanging the Meter: this option is addressed in the proposed new section 2 to Electric Service Regulation No. 7 and the addition of 7R.2 to Electric Service Schedule No. 300. The cost associated with this option will be \$252.29 plus a meter reading charge of \$22.00/month.

Option 3 – Combination of Meter Relocation and Exchange: the costs of this option will be \$252.29 plus the meter reading charge of \$22.00/month plus meter relocation costs.

#### *Option 1 – Meter Relocation*

Under this option, the standard AMR meter continues to be used but would be moved away from the customer's premises. Meter relocations are addressed within Section 6 of Electric Service Regulation 12. In its filing, the Company indicates that the average cost for a simple residential meter relocation is \$500.00. The Company states additional costs may be incurred by the customer such as providing a meter base, necessary conduit, meter pedestal, riser with weatherhead, meter pole, and/or easements to facilitate the relocation. These customer costs will vary by each customer's property configuration and occur on a case by case basis. Hence the Office accepts the average cost of meter relocation of \$500.00 as a baseline estimate within this filing.

#### *Option 2 – Replacing the AMR Meter*

Under option 2, the Company replaces the standard AMR meter with a non-standard meter. The costs include the initial replacement with a non-standard meter and the subsequent replacement back to the AMR meter. Thus, the requesting customer pays the full incremental cost of replacing the meter because the assumption is that future customers at that location will most likely choose standard service.

The Company outlined costs associated with replacing a standard meter with a non-standard meter as follows:

**Replacement of Standard Meter**

*Meter Cost*

Non-radio frequency transmitting meter cost (Residential)		\$80.94
(Less) Standard meter* cost		-\$31.00

*Labor*

Meterman - Hourly Activity Rate	\$95.00	
Installation time (hours)	0.40	\$38.00
Test/Restock Removed Meter (hours)	0.33	\$31.35
Travel time (hours)	0.50	\$47.50
<b><i>Total Install Cost (Labor plus Material)</i></b>		<b>\$166.79</b>

**Subsequent Removal of Non-Standard Meter**

*Labor*

Installation time (hours)	0.40	\$38.00
Travel time (hours)	0.50	\$47.50
<b><i>Total Removal Cost (Labor Only)</i></b>		<b>\$85.50</b>

<b>Total Costs</b>		<b>\$252.29</b>
--------------------	--	-----------------

The Office reviewed the costs and noted no restocking costs associated with the removal of the non-standard meter had been included. The Company indicated to the Office that the Company will restock the non-standard meter if it is re-usable and if the meter passes testing. The restocking cost for the non-standard meter is the same as the restocking cost for the standard meter. Including the restocking cost of the non-standard meter increases Option 2's cost from \$252.29 to \$286.64.

In addition to these replacement costs, changing the meter to a non-standard meter requires manual meter reading. Under standard conditions, a Company meter reader drives a route where the AMR meter communicates usage data from the meter to the meter reader's vehicle. The Company indicated a monthly charge of \$22.00 would be assessed for manual meter reading. This meter reading charge was based on the average time to manually read the meter and incremental travel time. In reviewing these

costs, the Office agreed these were reasonable accommodation costs for the customer receiving the accommodation to incur.

*Option 3 - Combination of Meter Relocation and Replacement*

This option combines the features of options 1 and 2. The cost associated with this option is the summation of options 1 and 2 resulting in an estimated average cost of \$752.29 plus \$22.00 per month for meter reading. This option is not described in the proposed tariff.

Summary

Based on the analysis above, the Office believes the costs for the three options are reasonable.

The Company only listed option 2 in its tariff filing modifications. The other options exist within current regulations as meter relocation and a combination of meter relocation and exchanging the standard meter for a non-standard meter. The Office supports the Company's proposed tariff changes because the customer seeking the accommodation will bear the responsibility for all incremental costs and costs are not passed on to other rate payers.

Recommendation

The Office recommends that the Commission approve the Company's filing with one amendment. The Meter Replacement cost should be increased to \$286.64 to include the missing re-stocking cost in the subsequent removal of the non-standard meter.