



1407 W. North Temple, Suite 330
Salt Lake City, Utah 84116

February 21, 2019

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

Re: **Advice No. 19-02**
Docket No. 19-035-T02
Rocky Mountain Power's Proposed Tariff Revisions to Electric Service Regulation
Nos. 7 (Metering), 8 (Billings)

On September 17, 2018, PacifiCorp d.b.a Rocky Mountain Power ("Company") filed Advice No. 18-04 requesting approval of changes to several Electric Service Regulations to incorporate various clarifications, housekeeping, updates, and policy changes ("Tariff Filing"). The Public Service Commission of Utah ("Commission") issued a Scheduling Order and Order Suspending Tariff on September 25, 2018 ("Scheduling Order"), in Docket No. 18-035-T04 that set a deadline for comments from interested parties by November 20, 2018, and reply comments on December 12, 2018. The Commission later added an additional reply comment period on January 10, 2019. The Division of Public Utilities ("Division") and Utah Association of Energy Users ("UAE") filed comments on November 20, 2018, and reply comments on January 10, 2019, regarding the Company's proposed revised tariff pages. The Company responded to the November 20, 2018, comments by the Division and UAE on December 12, 2018 ("Reply Comments").

As part of the Tariff Filing, the Company requested modifications to Regulation No. 7 – Metering, Section 4(b) – Bill Adjustments for Meter Error and Failure to Register. The proposed changes were intended to clarify the distinction between a meter that fails to register correctly and a meter that completely fails to register any usage. In its comments, the Division stated it did not oppose the Company's suggested revisions to Regulation 7, Section 4(b), but suggested that the language contained in Regulation 8, Section 8, referenced in the proposed Regulation 7 and the rules that are its basis should be reviewed to ensure clarity and consistency. The Division also noted a broader concern regarding the equity of the rule and suggested a review of the rules, which the Company agreed to in Reply Comments.

The Commission issued an order on January 15, 2019, declining to adopt any changes to Regulation No. 7 until the Division's recommended review of the rules was completed.

Since the issuance of the order, the Company worked with the Division, Office of Consumer Services (“Office”), and UAE to review the rules and regulations regarding backbilling timeframes. The changes reflected to Regulation No. 7 – Metering and Regulation No. 8 – Billings included with this filing are a result of the collaborative discussions, and the Company is authorized to represent that the Division and Office support the changes and UAE does not oppose them.

Enclosed for filing are tariff pages associated with Tariff P.S.C.U No. 50 applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405-2(D), the Company states that the proposed tariff sheets do not constitute a violation of state law or Commission rule. The Company respectfully requests an effective date of April 22, 2019, for these changes.

First Revision of Sheet No. 7R.4	Electric Service	Metering
	Regulation No. 7	
First Revision of Sheet No. 8R.3	Electric Service	Billings
	Regulation No. 8	

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

By E-mail (preferred): datarequest@pacificorp.com
jana.saba@pacificorp.com

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

Informal inquiries may be directed to Jana Saba, Manager, State Regulatory Affairs, at (801) 220-2823.

Sincerely,



Joelle Steward
Vice President, Regulation

cc: Service List Docket No. 18-035-T04

Enclosures

Proposed Tariff Sheets – Redline

ELECTRIC SERVICE REGULATION NO. 7 - Continued

4. BILL ADJUSTMENTS FOR METER ERROR AND FAILURE TO REGISTER

(a) Meter Error

If a meter tested is more than two percent fast, the Company shall refund to the customer the overcharge based on the corrected meter readings for the period the meter was in use, not exceeding six months, unless it can be shown that the error was due to some cause, the date of which can be fixed.

If a meter tested pursuant to this section is more than two percent slow, the Company may bill the customer for the estimated power and energy consumed but not covered by the bill for a period not exceeding six months unless it can be shown that the error was due to some cause, the date of which can be fixed.

(b) Failure to Register

If any meter registers usage, but fails to register the ~~correctly the~~ amount of electric power or energy used by the Customer for any reason, the amount of such use will be estimated by the Company from the best available information, and billed subject to the limitations of this Section 4, and Electric Service Regulation No. 8, Section 8.

If a meter does not register any usage, the Company may bill the customer for the estimated power and energy used but not registered for a period not exceeding three months.

If the Company finds that the meter has been tampered with, the Customer shall pay for such estimated usage together with the expense for restoring the Company's equipment to its normal operating condition and correcting Company billing records.

5. MASTER METERING

(a) Master Metering Standard

A master meter is any meter that serves more than one Customer. Master metering is only allowed as provided for in Exemptions to Master Metering. Other than as provided in Exemptions to Master Metering, individual metering is required for a new building if:

- (1) There is more than one unit in such building, and
- (2) The occupant of each unit uses electricity in the unit.

(b) Exemptions to Master Metering

Separate individual metering is not required for:

- (1) Those portions of transient multiple occupancy buildings and transient mobile home parks normally used as temporary domiciles in such buildings as hotels,

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Issued by authority of Report and Order of the Public Service Commission of Utah in Docket Advice No. 13-035-18419-02

FILED: September 5, 2014February 21, 2019
2019

EFFECTIVE: September 1, 2014April 22,

ELECTRIC SERVICE REGULATION NO. 7 - Continued

motels, dormitories, rooming houses, hospitals, nursing homes and those mobile home park sections designated for travel trailers;

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ELECTRIC SERVICE REGULATION NO. 8 - Continued

7. DISPUTED BILL (continued)

If such negotiation does not resolve the dispute, the account holder may obtain informal or formal review of the dispute as set forth in Electric Service Regulation No. 1. While an account holder is proceeding with either informal or formal review of a dispute, electric service will not be terminated provided any amounts not in dispute are paid when due.

8. BILLING ADJUSTMENTS

(a) Definitions

- (1) A “backbill” is that portion of any bill, other than a levelized bill, which represents charges not previously billed for service that was actually delivered to the customer during a period before the current billing cycle.
- (2) A catch-up bill is a bill based upon an actual reading rendered after one or more bills based on estimated or customer readings. A catch-up bill which exceeds by 50 percent or more the bill that would have been rendered under the Company’s standard estimation program is presumed to be a backbill.

(b) Notice

The account holder may be notified by mail, by phone, or by a personal visit, of the reason for the backbill. This notification shall be followed by, or include a written explanation of the reason for the backbill that shall be received by the customer before the due date and be sufficiently detailed to apprise the customer of the circumstances error or condition that caused the underbilling, and, if the backbill covers more than a 24 month period, a statement setting forth the reason(s) the Company did not limit the backbill under Paragraph 8.d. below.

(c) Limitations on Rendering a Backbill

~~If The-the~~ Company is going to render a backbill it must do so within ~~shall not render a backbill more than~~ three months ~~after from the time~~ the Company actually became becomes aware of the circumstance, error, or condition that caused the underbilling. This limitation does not apply to fraud, and theft of service limitations.

(d) Limitations of the Period for Backbilling

- 1) The Company shall not bill a Customer for service rendered more than 24 months before the Company actually became aware of the circumstance or error, or condition that caused the underbilling or that the original billing was incorrect.

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Issued by authority of Report and Order of the Public Service Commission of Utah in ~~Docket No. 13-035-184~~ Advice No. 19-02

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Proposed Tariff Sheets - Clean

ELECTRIC SERVICE REGULATION NO. 7 - Continued

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