P.S.C.U. Docket No. 21-057-03 Data Request No. PSC B.1 Requested by PSC Date of DEU Response _04/23/2021_

PSC B.1.: Please provide additional photographs of your home, not your neighbors' homes. The photographs provided by DEU create an inference supporting DEU's contention that your preferred location is inaccessible during heavy winter conditions. Please provide sufficient photos to show a safe walking path, assuming heavy winter conditions. The PSC would like to see that Mr. Parsons' proposed meter location is just as safe as that of DEU's preferred location. Pictures comparing the two locations would be helpful.

Answer:

DEU notes that the photos previously provided by Complainant do not reflect the conditions at Complainant's home. DEU requires access to the meter year-round. The subject home is in a high snowfall area, and DEU is concerned for the safety of its employees who may need to traverse the length of the home on a path that may or may not be clear of snow and ice. Those same employees would be required to work on a meter on a steep hill that would likely not be clear of snow and ice. DEU provides, as DEU Exhibit B.1. Attachment 1, photographs of homes adjacent to and/or on the same hillside as the Complainant's home. These photos illustrate appropriate placement of meters in these circumstances. These photos were taken on April 21, 2021.

In each instance, the meter is placed in a location protected from snow and ice, and accessible via a route that is also protected from snow and ice.

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