



State of Utah

Department of Commerce  
Division of Public Utilities

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## Action Request Response

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Artie Powell, Director

Doug Wheelwright, Utility Technical Consultant Supervisor

Eric Orton, Utility Technical Consultant

**Date:** May 20, 2021

**Re:** **Docket No. 21-057-T04**, In the Matter of the Modification of Dominion Energy's Tariff to the Manual Meter Reading Charge.

### Recommendation (Approve)

The Division of Public Utilities (Division) recommends that the Public Service Commission of Utah (Commission) approve Dominion Energy Utah's (Dominion) requested rate change to Section 2.02 of its Utah Natural Gas Tariff. The proposed change would assess a \$20 per month charge to customers where Dominion personnel are unable to access to their natural gas meters.

### Issue

Dominion has completed nearly all of the planned transponder replacements as part of its Transponder Replacement Program (TRP). Of the remaining transponders to be replaced, there are 37 transponders that have not been replaced due to Dominion being unable to access the meters. In order to incent these customers, Dominion requests Commission approval to make changes to Section 2.02 of its Tariff to allow it to assess the currently-effective \$20 per month manual meter reading fee on these customers that have meters that are difficult to access.

## **Background**

In 2015 Dominion detected problems with its meter transponders and determined it needed to replace them. In 2016, Dominion commenced its TRP and has recently submitted its final report to the Commission.

In October 2019, Dominion submitted its application to the Commission requesting a waiver of certain Commission rules regarding meter reading and estimated bills. Both the Office of Consumer Services (Office) and Division filed comments and began negotiations that eventually led to a settlement. On November 14, 2019, the three parties filed a joint settlement stipulation (Stipulation) “resolving issues related to Dominion Energy Utah’s transponder replacement program.” On December 10, 2019 the Commission approved the settlement stipulation.

At the completion of the TRP, Dominion is also required to “file a final status report with the Commission notifying the Commission and Parties that the program is complete.” Dominion has completed nearly all of the transponder replacements, and filed its final status report on May 12, 2021. There are currently 37 transponders that have not been replaced due to access issues.

Also on May 12, 2021, Dominion submitted its request to the Commission to allow it to impose the monthly manual meter reading fee for these 37 customers. The Commission issued its Action Request to the Division on that same day directing it to investigate the filing. On May 14, 2021 the Commission issued its Notice of Filing and Comment Period stating that comments are due May 26, 2021. These are the Division’s Comments and its Action Request Response.

## **Discussion**

Dominion explains there are 37 meters that have not had their transponder replaced due to access issues. According to Dominion, it has made repeated attempts to gain access to these customers’ premises to replace the transponders, but has been unsuccessful. In its tariff Section 2.02, Dominion is currently allowed to charge customers who request manual meter reads a fee of \$20 per month for this service. Specifically it states “Customers who request removal of transponders or decline automated meter reading will be assessed a \$20.00 per month manual meter reading fee.” Dominion wants to charge the same \$20 monthly manual meter reading fee to the 37 customers who do not have accessible meters. The objective of this request is not to

receive compensation for the additional costs to have a meter read manually, rather it is intended as a financial incentive to motivate the customer. Dominion believes that the imposition of this additional cost will incent customers to provide access to “difficult-to-reach” meters, which is not a clearly defined term at this juncture, neither do we know the reason these meters are “difficult-to-reach”.

Though the existing Tariff language does require customers to provide access, should that not be provided, the remedy is limited to discontinuance of service. Rather than disconnect these customers, Dominion would rather impose this \$20 monthly fee as an interim step. It believes that the imposition of this fee will incent customers to provide it access, without the imminent result of loss of service. However, should this incentive not work in the next five months (totaling \$100 in fees per customer), Dominion should commence shut off procedures as this fee is not intended to enrich Dominion by continuing it over the long term.

The proposed Tariff change will not affect any other present rates or charges. However, if the Commission approves Dominion’s request, prior to imposing the charge, Dominion should contact and inform each of the 37 customers of the impending charge and request access to the meter to replace the transponder.

## **Conclusion**

The Division finds the proposed tariff rate to be reasonable and recommends the Commission approve the rate as proposed by Dominion with an effective date of June 11, 2021. The Division sees no harm in implementing this \$20 penalty in an attempt to achieve the proposed goal of access to the remaining 37 meters that need transponder replacement. The Division, however, recommends that the Commission direct Dominion to make a final attempt to replace the transponders before implementing the charge. The Division further recommends a time limit of five months at which time the regular procedure found in section 7.02 of the Tariff should be instigated resulting in disconnection.

Cc: Kelly Mendenhall, Dominion Energy Utah  
Michele Beck, Office of Consumer Service