



Portland General Electric Company
Legal Department
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Cece L. Coleman
Assistant General Counsel

August 7, 2014

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
PO Box 1088
Salem OR 97308-1088

Re: Request for Waiver of OAR 860-023-0015(1)

Attention Filing Center:

Enclosed for filing are an original and one copy of **Portland General Electric Company's** Request for Waiver of OAR 860-023-0015(1). This document is being filed by electronic mail with the Filing Center and by U.S. mail.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "Cece L. Coleman". The signature is written in a cursive, flowing style.

Cece L. Coleman
Assistant General Counsel

CLC:jmh
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY'S,

REQUEST FOR WAIVER OF
OAR 860-023-0015(1)

REQUEST FOR WAIVER

**EXPEDITED CONSIDERATION
REQUESTED**

Pursuant to OAR 860-023-0015(1), Portland General Electric submits this request for a waiver of certain requirements contained in OAR 860-023-0015, in order to allow for a smaller sampling of pre-installation, new meter testing with regard to the 70,000 Sensus 2S Gen3 RC meters PGE is planning to exchange. In preparation for making this request, PGE has discussed a sampling technique for testing new meters with OPUC safety staff, Lori Koho and Paul Birkeland, and both appear to support the sampling technique that PGE has proposed and this request.

Part of PGE's 70,000 meter replacement strategy is to replace about half of the existing meters with a standard Sensus 2S Gen3 meter that has no remote connect capability. This type of meter has served PGE and its customers well, and we have not experienced safety issues such as those associated with the RC meter.

PGE is anticipating delivery of approximately 35,000 Sensus 2S Gen3 non-remote connect meters between today and mid-October, 2014. If granted the waiver, PGE has proposed to the OPUC safety staff that PGE will test those meters in accordance with the procedures set forth in a previous Commission-approved meter testing policy for those types of meters which was applicable during PGE's AMI deployment period from 2008 -2010. All the new Sensus 2S Gen3 meters will be coming from the same Sensus factory.

To be more specific, the method PGE proposes to use again is, to generally follow ANSI Z1.9 sampling procedures for lot size and then apply Inspection Levels General III highest level to compensate for the lack of statistically accurate randomness with which the meters are selected for testing. Based on the expected delivery of 5,000 meters per week, per ANSI/ASQA Z1.9-2003 Table A-2, Inspection Level M is applicable. As found in ANSI/ASQA Z1.9-2003 Table B-3, inspection level M equals 100 meters that should be tested. However, PGE proposes to test 200 meters. This is consistent with PGE's AMI deployment method of meter testing. PGE will pull boxes of four meters out of each delivery and test those meters contained within each pulled box. To be clear, this waiver is being requested and will only be applied with respect to the testing of the Sensus 2S non-remote connect meters.

CONCLUSION AND EXPEDITED CONSIDERATION REQUEST

For the reasons discussed above, PGE requests that the Commission issue an order temporarily waiving those portions of OAR 890-023-0015 requiring testing of all meters. Accordingly, expedited consideration of this motion is requested.

DATED this 7th day of August, 2014.

Respectfully submitted,



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