

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: December 12, 2023**

REGULAR _____ **CONSENT** X **EFFECTIVE DATE** January 1, 2024

DATE: December 12, 2023

TO: Public Utility Commission

FROM: Yassir Rashid

THROUGH: Bryan Conway and Heide Caswell **SIGNED**

SUBJECT: PORTLAND GENERAL ELECTRIC:
(Docket No. UM 1384)
PGE's Revision to Meter Test and Inspection Policy.

STAFF RECOMMENDATION:

Staff recommends the Public Utility Commission of Oregon (Commission) approve Portland General Electric's (PGE or Company) revised Meter Test and Inspection Policy to be effective on and after January 1, 2024.

DISCUSSION:

Issue

Whether the Commission should approve the revised Meter Test and Inspection Policy adopted by PGE, to be effective on and after January 1, 2024.

Applicable Law

Adopted pursuant to Oregon Revised Statute (ORS) 757.250(2), Oregon Administrative Rule (OAR) 860-023-0015 sets out the Commission's requirements for testing electric meters to ensure metering accuracy. As relevant here, the rule provides:

- (1) All meters shall be tested before installation, or within 30 days thereafter. No meter will be placed in service or be allowed to remain in service which has an error in registration in excess of two percent under conditions of normal operation. These requirements may be waived by

written agreement if the energy utility provides an approved random sampling technique for testing new meters.

(3) Each energy utility shall adopt schedules for periodic tests and repairs of meters. The length of time meters shall be allowed to remain in service before receiving periodic tests and repairs is to be determined from periodic analysis of the accuracy of meters tested. The schedules adopted shall be subject to the Commission's approval.

(5) Each energy utility shall, unless specifically excluded by the Commission, provide such laboratory meter-testing equipment and other equipment and facilities as needed to make the tests required of it by these rules or other orders of the Commission. The apparatus and equipment so provided shall be subject to the Commission's approval.

Under OAR 860-021-0135(6), adjustment of a customer's bill is not required if an electric or gas meter registers less than a two percent error under conditions of normal operation.

Analysis

Background

On February 4, 2014, the Commission approved PGE Meter Test and Inspection Policy, which went into effect on February 5, 2014.¹ On April 27, 2020, the Commission approved the current Revised PGE Meter Test and Inspection Policy, which went into effect on April 22, 2020.² On September 12, 2023, PGE filed for the Commission's approval a new revision to its Meter Test and Inspection Policy with a proposed effective date of January 1, 2024. In these policies PGE outlines the methods it uses to ensure meters are measuring accurately throughout their service life. In order to validate measurement accuracy PGE has utilized a sampling plan for families of meters that serve as indicators for the remainder of the meter family.

Review

PGE indicated that its revision of its Meter Test and Inspection Policy aligns with recent industry standards that adopted the use of automated metering infrastructure (AMI) datasets to better identify meter anomalies and to improve the overall meter system health using data analytics programs. The standard that outlines such utilization of data

¹ *In the Matter of Portland General Electric Company, filing of Amended Meter Testing and Inspection Policy*, Docket No. UM 1384, Order No. 14-040.

² *In the Matter of Portland General Electric Company, Revision to Meter Test and Inspection Policy*, Docket No. UM 1384, Order No. 20-139.

analytics is ANSI C12.1 – 2022, Section 5.0.3.3. PGE proposes to change its the random sample meter testing methods such that *only* meters that do not communicate with the Company's AMI network be subject to random sampling. AMI meters will feed data to PGE's data analytics program and will not be part of the random sampling procedures and meters that are communicating properly will be evaluated for accuracy using data analytics processes. As such, the AMI system and this data analytics will provide greater confidence of accurate measurement for a larger population of meters, while the legacy periodic meter change program will serve to ensure non-communicating meters are also being validated for their measurement accuracy.

As part of its petition, PGE provided a summary of its Meter Analytics Plan, which comprises of four pillars, a) ongoing meter anomalies detection with data and analytics; b) field validation and remediation; c) meter settings refinements; and d) governance and continuous feedback. By implementing these pillars, PGE will be in a continuous state of monitoring and assessing its metering system, while efficiently using its field resources to mitigate all the anomalies in a timely fashion. PGE's plan also anticipates Staff will be involved in each of these steps and will incorporate feedback into its development process.

PGE laid out its implementation schedule as follows:

- 2023 was the pilot year where meter and service anomalies have been identified with data and analytics and remediated in the field,
- 2024 will be the baseline year for the rollout of the analytics plan, and
- 2025 will be the operational year that includes governance and continuous feedback to incorporate learned outcomes and results.

Conclusion

Based on the review of the filing and the discussion between Staff and PGE, Staff recommends that the Commission approve the Meter Test and Inspection Policy that PGE filed on September 29, 2023.

PROPOSED COMMISSION MOTION:

Approve PGE's revised Meter Test and Inspection Policy effective on and after January 1, 2024.