

August 3, 2018

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: Advice 18-006 –Rule 8 —Metering and Schedule 300 – Charges as Defined by Rules and Regulations

In compliance with ORS 757.205, OAR 860-022-0025, and OAR 860-022-0030, PacifiCorp d/b/a Pacific Power submits for filing with the Public Utility Commission of Oregon (Commission) the following proposed tariff sheets associated with Tariff P.U.C. OR No. 36, which sets forth all rates, tolls, charges, rules, and regulations applicable to electric service in Oregon. PacifiCorp respectfully requests an effective date of August 15, 2018. An application for Less than Statutory Notice is included with this filing.

First Revision of Sheet No. R8-3	Rule 8	Metering
First Revision of Sheet No. R8-4	Rule8	Metering
Second Revision of Sheet No. 300-1	Schedule 300	Charges as Defined by Rules and Regulations

Purpose

The purpose of this filing is to remove the Removal of Non-Radio Frequency Meter charge (Removal Charge) from Schedule 300 and make changes to the language in Rule 8 to reflect the removal of this charge.

The company proposes to remove the Removal Charge as a result of its experience during the Advanced Meter Infrastructure (AMI) roll-out, in response to customer feedback and out of concern for the safety of its employees and contractors.

Background

In advance of its planned AMI deployment, on January 4, 2017, PacifiCorp filed Advice No. 17-001 to add language to Rule 8 to provide an accommodation, or opt-out, to customers that do not wish to have the company's standard metering device (a radio frequency, or AMI meter) installed at their residence or attached to their home. In addition, a section was added to Schedule 300 to address the costs associated with the AMI meter opt-out.

The Removal Charge was one of the charges proposed in the new section of Schedule 300, along with charges for the Installation of Non-Radio Frequency Meter and Monthly Meter Readings.

Advice No. 17-001 was approved by the Commission via the consent agenda at the March 21, 2017 public meeting, as memorialized in Order No. 17-113.¹ The company proposed, and the Commission approved, the following costs:

Fee	Amount	Frequency	Purpose
Installation of Non-Radio Frequency Meter	\$169	One-time	Cost-based recovery of the company's cost to install a non-radio frequency meter after an AMI meter has been removed.
Removal of Non-Radio Frequency Meter	\$137	One-time	Cost-based recovery of the company's cost to remove a non-radio frequency meter at the point in time when an AMI meter is installed after initial deployment.
Monthly Meter Readings	\$36	Monthly	Cost-based recovery of the costs of manually reading non-radio frequency meters on a monthly basis.

PacifiCorp began rolling out installation of AMI meters in its Oregon service territory in January 2018. The technology will provide customers with useful information about their energy consumption, provide alerts when bills are projected to reach dollar thresholds set by the customer, and provide customers the ability to receive daily feedback on the effectiveness of any energy efficiency measures they wish to implement.

The company plans to install 590,000 AMI meters in its Oregon service territory. As of July 30, 2018, approximately 202,787 AMI meters have been installed throughout the state and approximately 1,541 customers have opted-out of AMI meter installation. The incidence of customers opting out of AMI meter installation is 0.76 percent of installed meters, which is 0.26 percent of all meters in Oregon. The company anticipated there would be customer opt-outs; the current experience of opt-out frequency is not expected to have an impact on the overall benefits of the AMI project or the cost-effectiveness of the AMI investment.

Since deployment began, the company has received feedback directly from customers regarding the fees associated with opting out from AMI meters. Customers are concerned about these fees and their ability to opt-out of AMI installation given the financial impacts of the approved opt-out fees. As the company indicated in its advice filing proposing these charges, these charges are cost-based and reflect the costs incurred by the company to accommodate customers opting out of AMI installation.

¹ *In the Matter of PacifiCorp dba Pacific Power, Advice No. 17-001 (ADV 495), Revisions to Rule 8 and Schedule 300 Related to Pacific Power's Transition to Advanced Metering Infrastructure.* Docket No. UE 322, Order No. 17-113 (Mar. 21, 2017).

PacifiCorp has heard the concerns of its customers and is requesting to eliminate the \$137 Removal Charge contained in Schedule 300 at this time. The future meter Removal Charge is intended to recover the prospective cost of removing the existing non-radio frequency meter that remains in service when a customer opts-out of AMI deployment. The removal of the existing non-radio frequency meter will not occur unless and until the customer vacates the premise or the customer requests installation of AMI after initial deployment is complete. The company continues to support cost-based fees reflective of the actual costs associated with AMI opt-outs, but recognizes that the \$137 Removal Charge, because it is a fee for prospective work, is more appropriately addressed after deployment. Removal of this fee during initial deployment will lessen the immediate financial impact to our customers associated with opting out. Of the 1,541 opt-out customers, only 342 have already been charged the \$137 Removal Charge. If this tariff filing is approved, PacifiCorp will refund these amounts that have already been charged and collected from customers.

Proposed Changes

PacifiCorp proposes to remove the Removal Charge from Schedule 300 and make related changes to the language in Rule 8 to reflect this. The company wants all customers to receive the benefits of the AMI technology. However, in order to balance these benefits with the feedback received from customers, community leaders, and local governments, and to preserve the safety of its AMI installers and the public, PacifiCorp proposes to remove the Removal Charge from Schedule 300 and revisit this charge after the AMI deployment is substantially complete.

In compliance with OAR 860-022-0025, the company states that the tariff changes proposed in this filing will affect those customers that choose a non-AMI meter; therefore the number of customers affected is not known at this time.

It is respectfully requested that all formal data requests regarding this filing be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon 97232

Informal inquiries regarding this filing may be directed to Natasha Siores, Manager, Regulatory Affairs, at (503) 813-6583 or Melissa Nottingham, Manager, Customer Advocacy and Tariff Policy, at (503) 813-5136.

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Public Utility Commission of Oregon
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Sincerely,

A handwritten signature in black ink, appearing to read 'Etta Lockey', with a long, sweeping horizontal line extending to the right.

Etta Lockey
Vice President, Regulation

Enclosures

Proposed Tariff Sheets

III. Non-Radio Frequency Metering Accommodation

A Customer may request an alternative to the Company's standard radio frequency meter installation from the following:

- a. Relocation of the Customer's meter base to a different location approved by the Company and the installation of a standard meter;
- b. Relocation of the Customer's meter base to a different location approved by the Company and the installation of a Company approved non-radio frequency meter;
- c. Exchanging a standard meter for a Company approved non-radio frequency meter.

A Customer selecting the option to relocate the meter base will be subject to the meter installation requirements of this regulation as well as Electric Service Rule 13. If the relocation requires a change in the existing service the Customer is responsible for charges to relocate the service including but not limited to the installation of conduit, trenching, obtaining easements, and any additional costs of removing and installing new facilities. If an acceptable meter location cannot be provided on the premises, the Customer's request will not be granted. The Customer must provide written permission of the owner stating the Customer has obtained the owner's permission to proceed with relocating the meter base.

Customers who elect to have a non-radio frequency meter will be subject to installation of the non-radio frequency meter as set forth in Schedule 300. All applicable fees will be paid prior to the installation of the non-radio frequency meter. The Schedule 300 charges for the installation is in addition to any aforementioned costs to relocate the Customer's service. (C)

If a radio frequency meter is installed at the Customer's premise prior to January 1, 2018 and the Customer requests a non-radio frequency meter, the Customer will not be required to pay the installation charge in Schedule 300. (C)

Only non-radio frequency meters approved, obtained, installed, and owned by the Company will be allowed. The Customer's request to replace a radio frequency meter with a non-radio frequency meter cannot be accommodated until an approved non-radio frequency meter can be obtained by the Company. (C)

All Customers with a non-radio frequency meter shall be responsible to pay the monthly meter reading fee in Schedule 300, which will be included in the Customer's monthly service billing. (C)

Customers with non-radio frequency meters may be excluded from participating in Company offered programs for which a standard radio frequency meter is required. (C)

(continued)

III. Non-Radio Frequency Metering Accommodation (continued)

The Company may revoke the meter exchange accommodation of a non-radio frequency meter by reinstalling the Company's standard radio frequency meter for any of the following conditions:

(C)

- a. Meter tampering;
- b. Impeding Company access to the meter to obtain monthly meter readings, perform maintenance or to disconnect meter for non-payment of electric service; or
- c. Service has been disconnected for non-payment of electric service twice within a 12-month period.

**CHARGES AS DEFINED BY
 THE RULES AND REGULATIONS**
Purpose

The purpose of this Schedule is to list the charges referred to in the General Rules and Regulations.

Available

In all territory served by the Company in Oregon.

Applicable

For all Consumers utilizing the services of the Company as defined and described in the General Rules and Regulations.

Service Charges

<u>Rule No.</u>	<u>Sheet No.</u>	<u>Description</u>	<u>Charge</u>
2	R2-1	Demand Pulse Access Charge:	\$1,500.00
2	R2-4	Portfolio Ballot Processing First ballot processed per year All other ballots processed	Free \$5.00
6	R6-1	Meter Charges: Meter Repairs/Replacement	Actual Repair/ Replacement Cost
8	R8-1&2	Meter Test for Accuracy: Once in twelve months Two or more times in twelve months	No Charge \$50.00 each
8	R8-1	Meter Verification Fee	\$20.00 per unit
8	R8-2	Interval Meter Charge Small Nonresidential Consumers	Actual Cost
8	R8-3	Non-Radio Frequency Meter Accommodation Installation of Non-Radio Frequency Meter Monthly Meter Readings	\$169 \$36/month (D)
9	R9-1	Deposit: Normal office hours Residential Established high risk Nonresidential No established credit or established high risk	1/6 estimated annual billing 1/6 estimated annual billing

(continued)

LESS THAN STATUTORY NOTICE APPLICATION

This document may be electronically filed by sending it as an attachment to an electronic mail message addressed to the Commission's Filing Center at puc.filingcenter@state.or.us.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF THE APPLICATION OF PacifiCorp d/b/a Pacific Power _____ (UTILITY COMPANY)))))	UTILITY L.S.N. APPLICATION NO. _____ (LEAVE BLANK)
TO WAIVE STATUTORY NOTICE.		

NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.

1. GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)
 The purpose of this filing is to remove the Removal of Non-Radio Frequency Meter charge (Removal Charge) from Schedule 300.

First Revision of Sheet No. R8-3 - Rule 8 Metering
 First Revision of Sheet No. R8-4 - Rule 8 Metering
 Second Revision of Sheet No. 300-1 - Charges as Defined by Rules and Regulations

2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)

Original Sheet No. R8-3 - Rule 8 Metering
 Original Sheet No. R8-4 - Rule 8 Metering
 First Revision of Sheet No. 300-1 - Charges as Defined by Rules and Regulations

3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM)

First Revision of Sheet No. R8-3 - Rule 8 Metering
 First Revision of Sheet No. R8-4 - Rule 8 Metering
 Second Revision of Sheet No. 300-1 - Charges as Defined by Rules and Regulations

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:

PacifiCorp would like to make this change as soon as is administratively possible. The company wants all customers to receive the benefits of the AMI technology. However, in order to balance these benefits with the feedback received from customers, community leaders, and local governments, and to preserve the safety of its AMI installers, PacifiCorp proposes to remove the Removal Charge from Schedule 300 and revisit this charge after the AMI deployment is substantially complete.

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): August 15, 2018

. AUTHORIZED SIGNATURE 	TITLE Vice President, Regulation	DATE August 3, 2018
PUC USE ONLY		
<input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE	
AUTHORIZED SIGNATURE	DATE	