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October 5, 2026

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3612

**Re: Advice No. 26-04-G – Avista Utilities Proposed Revisions to Rule 18**

Filing Center:

Pursuant to ORS 757.205 and OAR 860-022, Avista Corporation, dba Avista Utilities (Avista or the Company), hereby submits for electronic filing with the Oregon Public Utility Commission (Commission) its proposed modifications to its Rule 18, "Meter Tests and Adjustment of Bills for Meter Error". The Company requests that the following tariff sheet, P.U.C OR No. 5, become effective for service rendered on and after December 1, 2026:

| | | |
|---|---|---|
| **Third Revision Sheet 18D** | Canceling | **Second Revision Sheet 18D** |
| **Fourth Revision Sheet 18F** | Canceling | **Third Revision Sheet 18F** |
| **Fourth Revision Sheet 18G** | Canceling | **Third Revision Sheet 18G** |
| **Third Revision Sheet 18H** | Canceling | **Second Revision Sheet 18H** |

Deleted
**Original Sheet 18I**

The primary purpose of the requested tariff revision is to decrease the complexity of the inspection levels contained within the Company's current meter testing processes. The proposed revisions to sheet 18F simplify the Company's installed diaphragm meter testing program by eliminating the reduced inspection process and the related switching rules. Normal inspection will remain the applicable inspection level for applicable installed meter populations.

The remaining revisions are housekeeping changes that correct typographical errors on sheets 18D and 18G and repaginate the tariff following the removal of material from sheet 18F. As part of the repagination, all content from sheet 18I was moved to sheet 18H, allowing sheet 18I to be deleted in its entirety. Other than the revisions to sheet 18F, the filing includes no material changes. Additionally, no rate changes are being requested as a result of this filing.

## I. BACKGROUND

Rule 18 establishes requirements for testing natural gas meters and adjusting customer bills when a meter error is identified. For installed diaphragm meters rated at 1,000 cubic feet per hour (CFH) and

smaller, the rule provides for random sampling and evaluation of meter populations using the ANSI/ASQ Z1.9-2003 standard, including an Acceptable Quality Limit (AQL) of 10.0 for overall performance and for meters registering fast.

Sheet 18F currently describes both the normal and reduced inspection levels applicable to the Company's gas meter measurement performance testing program, known internally as the Periodic Meter Changeout Program, or PMC Program. It also permits meter types with five years of test history to become eligible for reduced inspection and includes switching rules for moving a meter population from normal to reduced inspection after five consecutive lots on normal inspection are accepted.

## II. PROPOSED TARIFF REVISIONS

Avista proposes to revise sheet 18F to simplify administration of the installed meter testing program and establish normal inspection as the single inspection level. Specifically, the Company proposes to:

- Retain normal inspection as the default inspection level, using the procedures and tables identified in the ANSI/ASQ Z1.9-2003 standard;
- Delete the separate reduced-inspection process, including the reference to the reduced-inspection tables in the standard;
- Delete the provision allowing existing meter types with five years of test history to qualify for reduced testing, including the use of historical test results to determine application of switching rules; and
- Delete the switching rules that allow a transition from normal to reduced inspection after five consecutive lots have been accepted, together with the related modification to the standard.

The proposed deletions do not change the AQL of 10.0 used to evaluate installed meter populations, the use of normal inspection, or the provisions requiring a meter population to be declared defective and removed from service when the applicable acceptance criteria are not met. The remaining provisions are renumbered as necessary to reflect the deletions.

## III. CONCLUSION

The proposed revision removes an unnecessary alternate testing path and provides a clearer, more consistent framework for administering the installed meter testing program. Avista respectfully requests that the tariff changes proposed for Rule 18 become effective for service rendered on and after December 1, 2026.

Information related to this filing has been included on the Company's website, www.myavista.com. If you have any questions regarding this filing, please contact me at (509) 495-7839 or jaime.stpeter@avistacorp.com.

Sincerely,

*/s/ Jaime St Peter*

Jaime St Peter
Regulatory Affairs Manager

Enclosures

RULE NO. 18 (continued)
METER TESTS AND ADJUSTMENT OF BILLS FOR METER ERROR

3. **Installed Meters Testing Program**

a. Meters shall be periodically inspected and tested against metering tolerances prescribed in OAR 860-023-0015. Meters found to be outside the tolerances of OAR 860-023-0015 shall be immediately adjusted or replaced. If a meter cannot be adjusted, and no replacement meter is immediately available, the inaccurate meter shall be removed and a replacement meter shall be installed as soon as possible. Service will be maintained to the Customer.

b. The methodology for sample sizes and analysis for the installed meter testing program is derived from ANSI/ASQ Z1.9-2003.

c. Diaphragm meters, 1000 CFH and smaller. A random sample of diaphragm meters shall be selected, tested against tolerances prescribed by OAR 860-023-0015, and analysis conducted using the Standard. The random sampling program shall begin during the 5th year after meter manufacture date. (T)

i. A meter population is defined as meters of the same model, size, and manufactured in the same year. Meter population is synonymous with the term lot as used in the Standard.

1) Major design changes to a meter model within a single year shall be a new population for sampling.

ii. A random sample of meters to be tested within a population will be made at the beginning of a calendar year. The random sample may be modified as described below.

1) Every meter in a population will be considered eligible for testing. If service work such as a reported gas odor brings a service person to a meter during the course of the year and the required test quota of meters has not yet been completed, the meter will be eligible for substitution into the sample of the meter population for that year.

2) Eligibility of meters for inclusion into the test population will be tracked electronically through the Work Order Management Program in conjunction with meter test program requirements. An electronic flag will alert the service person if a meter is eligible to be included in the year's test program. The service person will have the option to override the electronic flag if workload at the time does not lend itself to pulling that meter for testing.





RULE NO. 18 (continued)
METER TESTS AND ADJUSTMENT OF BILLS FOR METER ERROR

3) The intent of the analysis rules contained herein applied to the Standard using Table A-3 and Table A-1 yields: sample size code letters B through P: AQL = 10.0. Table A-3 of the Standard is utilized to determine the applicable AQL curve per the intent of the testing described above. When this point lies between standard AQL curves on Table A-3, the AQL curve to be applied shall be chosen per Table A-1 of the Standard.

iv. Normal inspection is the default level of inspection and shall be per the procedures contained in the Standard utilizing tables A-2, A-3, and B-3. (T)

v. Discontinuance of random sampling; failure of meter population. A meter population shall be declared defective and removed from service when: (D)

1) An annual inspection of a population is not accepted based on AQL of 10.0 for overall performance (double specification limit), *or*

2) An annual inspection of a population under normal inspection are found to be non-conforming fast meters in excess of OAR 860-023-0015 tolerances based on an AQL value of 10.0 (single specification limit). (M)

vi. Tested meters found to be outside the tolerances of OAR 860-023-0015 shall be adjusted to 100% plus or minus 0.5% with no greater than 0.7% spread before returning to service. If the meter cannot be adjusted to these standards it shall be removed from service and inventory; the Company will pursue compensation under any applicable manufacturer warranties. (T)

(T) (D)

d. Installed diaphragm meters, greater than 1000 CFH.

i. Meters 1001 CFH and greater are inspected and proved every five (5) years or sooner.

ii. All meters shall be tested against metering tolerances of OAR 860-023-0015.

iii. Meters found to be outside of tolerance shall be adjusted to 100% plus or minus 0.5%, with no greater spread than 0.7%, or will be removed from service and inventory; the Company will pursue compensation under any applicable manufacturer warranties. (M)





RULE NO. 18 (continued)
METER TESTS AND ADJUSTMENT OF BILLS FOR METER ERROR

e. Installed rotary meters shall be inspected and tested every five (5) years or sooner by differential testing or using proving equipment. (T)

i. Meters inspected by differential testing shall confirm that the meter is performing within 150% of the manufacturer's specification for differential pressure at the operating pressure.

ii. Every meter tested by proving shall confirm that the meter is operating within the tolerances of OAR 860-023-0015. Meters found to be outside of tolerance shall be adjusted to be not more than 2.0% slow or fast, or will be removed from service and inventory; the Company will pursue compensation under any applicable manufacturer warranties. (T)

f. Installed turbine meters. (M)

i. Installed single rotor turbine meters shall be inspected and spin tested annually and determined to be within the manufacturer's acceptability limits. Turbine meters failing the spin test shall be removed from the field and repaired prior to any subsequent installation.

ii. Installed auto adjust meters shall be inspected annually and determined to be operating within the manufacturer's acceptability limits. Meter Delta A (ΔA), the difference between the main and sensing rotor pulses, that exceed the manufacturer's recommended operating parameters shall be repaired or replaced.

iii. Turbine meters are proof tested against metering tolerances of OAR 860-023-0015.

iv. Meters found to be outside of tolerance shall be adjusted to 100% plus or minus 0.5%, with no greater spread than 0.7%, or will be removed from service and inventory; the Company will pursue compensation under any applicable manufacturer warranties.

g. Installed ultrasonic meters, greater than 1000 CFH.

i. Ultrasonic meters are proof tested against metering tolerances of OAR 860-023-0015.

ii. Meters found to be outside of tolerance shall be adjusted to 100% plus or minus 0.5%, with no greater spread than 0.7%, or will be removed from service and inventory; the Company will pursue compensation under any applicable manufacturer warranties. (M)





RULE NO. 18 (continued)
METER TESTS AND ADJUSTMENT OF BILLS FOR METER ERROR

4. **Meter Test Equipment and Application**
Meters shall be tested on either a Sonic Nozzle, Bell Prover, Transfer Prover, or sent off-site to an approved testing facility.

a. Transfer Prover. The accuracy of the testing equipment is ascertained through: i) Monthly in-house self-testing procedures, and ii) Sending of Standard Meter Module to the manufacturer for periodic calibration. The period between factory calibration shall not exceed five (5) years.

b. Sonic Nozzle Prover and Bell Prover. The accuracy of the testing equipment is ascertained through an automatic test diagnostic, which is completed each time the prover is powered on. The test equipment shall be factory calibrated every two (2) years.

c. Off-site meter testing facilities shall be qualified and perform testing per the appropriate American Gas Association Report Number. (M)

C. ADJUSTMENT OF BILLS FOR METER ERROR

Billing adjustments due to fast meters will be calculated on the basis that the meter should be 100% accurate. For the purpose of billing adjustment, the average error of the check rate and the open rate flow will be used.

1. Fast Meters: When, upon test, any meter is found to be registering more than 2% fast, the Company will refund or credit to the Customer the amount of the overcharge based on corrected meter readings. The period of time over which a refund is to be calculated is described in Rule No. 9 Section C.1. (M)



