

ITEM NO. CA9

PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: October 24, 2017

REGULAR  CONSENT  EFFECTIVE DATE October 25, 2017

DATE: October 10, 2017

TO: Public Utility Commission

FROM: John Fox JF

THROUGH: Jason Eisdorfer and John Crider

SUBJECT: PORTLAND GENERAL ELECTRIC: (Docket No. ADV 631/Advice No. 17-19) Schedule 320 Meter Information Services, Limiting Service to Interval Data

**STAFF RECOMMENDATION:**

Staff recommends the Commission approve Portland General Electric Company's (PGE or Company) revisions to Schedule 320 Meter Information Services as described in ADV 631/Advice No. 17-19, effective for service on or after October 25, 2017.

In addition, Staff recommends the Commission waive the 30-day statutory notice required by ORS 757.220 for this filing.

**DISCUSSION:**

Issue

Whether the Commission should approve the Company's request to immediately halt, to new customers only, the service involving Interval Data via File Transfer Protocol (FTP) to Third Party in Schedule 320, Meter Information Services, and if so, whether the Commission should waive the 30-day statutory notice required by ORS 757.220 for this filing.

Applicable Rule or Law

Every public utility must file schedules showing all rates, tolls and charges which it has established and which are in force at the time for any service performed by it within the state, along with all rules and regulations that in any manner affect the rates for any service. ORS 757.205(1), (2). The Commission may approve tariff changes if they are

deemed to be fair, just and reasonable. ORS 757.210. Tariff revisions may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0025. OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules must include in its filing a statement plainly indicating the increase, decrease, or other change made with the filing, the number of customers affected by the proposed change and the resulting change in annual revenue; and the reasons or grounds relied upon in support of the proposed change.

Filings that propose any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the change. ORS 757.220; OAR 860-022-0015. Tariff filings effective on less than 30-days' notice may be authorized with a waiver of less than statutory notice pursuant to ORS 757.220 "for good cause shown" when application is made on an approved form per OAR 860-022-0020.

## Analysis

### *Background*

PGE is in process of implementing a new Customer Information System (CIS) and meter data management system (MDMS). The last phase of the transition requires implementation of a "code freeze", i.e., a testing period during which no changes are permitted to the software system. The Company estimates that the replacement project will be completed early in the second quarter of 2018. Following its in-service date, there is a planned six month break-in period. The Company plans to recommence service following the break-in period. ADV 631 (Company Advice No. 17-19) would add a footnote to the Schedule 320 set up fee:

\* No new service for Interval Data via FTP to Third Party. FTP is used to send/receive files from a remote computer. See Special Condition 9.

And an additional special condition:

9. Interval Data via FTP to Third Party is not being offered at this time. The Interval Data via FTP will still be available to those customers receiving service as of September 29, 2017. The Interval Data is closed to new service during the implementation of the new Customer Information System (CIS) and meter data management system (MDMS).

The Company is not requesting a change in rates.  
There are currently 110 customers in the Meter Information Services program.

The Company's Less Than Statutory Notice (LSN) was filed on an obsolete form (rev 10-96) rather than the most current form available on the PUC website (rev 2-2015). However, the substantive questions are the same on both forms. The stated reason for the waiver request is:

"A Waiver of Statutory Notice is requested due to the public meeting being on October 24, 2017 and requests an effective date of October 25, 2017."

#### *Discussion & Analysis*

Staff notes that 18 customers were using the SFTP (Secure File Transfer Protocol) service as of May 2017. In the preceding 24-month period, there were four new customers added and two customers who discontinued the service. Implementation of a code freeze during system development is a typical software engineering practice and Staff believes the Company's request for an immediate freeze is reasonable under the circumstances.

#### Conclusion

Due to the small number of customers enrolled in the Interval Data via File Transfer Protocol portion of the Meter Information Services Program and the expectation that very few new customers would be enrolled while the program is closed to new customers, Staff recommends the Commission approve the application.

Staff also recommends the waiver of statutory notice be approved for the same reason.

#### **PROPOSED COMMISSION MOTION:**

Approve PGE's request to revise Schedule 320 Meter Information Services and allow ADV 631/Advice No. 17-19 with less than statutory notice, effective for service on or after October 25, 2017.