

January 4, 2017

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

Attn: Filing Center

**RE: Advice No. 17-001 – Rule 8 – Metering and Schedule 300 – Charges as Defined by Rules and Regulations**

In compliance with ORS 757.205 and OAR 860-022-0025, PacifiCorp d/b/a Pacific Power (Pacific Power or Company) hereby submits for filing the following proposed tariff pages 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. The Company respectfully requests an effective date of March 8, 2017.

First Revision of Sheet No. R8-2	Rule 8	Metering
Original Sheet No. R8-3	Rule 8	Metering
Original Sheet No. R8-4	Rule 8	Metering
First Revision of Sheet No. 300-1	Schedule 300	Charges as Defined by Rules and Regulations
Second Revision of Sheet No. 300-2	Schedule 300	Charges as Defined by Rules and Regulations

The purpose of this filing is to propose certain changes to Rule 8 and Schedule 300 as described below.

The Company is proposing to add language to Rule 8 to provide an accommodation for customers who do not wish to have the Company's standard metering device, a radio frequency meter, installed at their residence or attached to their home. Customers will be given the option to choose a non-radio frequency (non-standard) meter, relocate the meter base away from their home, or both. Supplemental to the accommodation being added to Rule 8, Schedule 300 will be amended to include a new section to address the costs associated with the non-radio frequency metering accommodation.

Pacific Power has been in communication with Commission Staff, the Citizens' Utility Board of Oregon, Community Action Partnership of Oregon, and the Oregon Department of Energy regarding the proposed changes. Informal workshops were held on September 28, 2016, and December 13, 2016, to receive feedback and further discuss the Company's proposed accommodation for customers requesting non-radio frequency meters or the relocation of the

meter base. Feedback from parties was used to inform the language in Rule 8 with specific attention on the application of charges and the ability for a customer to receive partial refund of charges when retracting the request for a non-radio frequency meter.

In June 2017, Pacific Power will begin installing smart meters in the Company's Oregon service territory during the Company's normal course of business. This includes, but is not limited to, the testing of metering equipment, meter investigation of slow or stopped meters, and disconnection of service. In January 2018 Pacific Power will commence installing smart meters to the majority of households in Oregon.

Pacific Power has heard from a limited number of customers objecting to the use of a meter with communications capabilities, expressing their belief the radio frequency from smart meters may be harmful to their health or invade the customer's privacy. While the Company is confident the smart meters are not harmful and personal information will be protected, Pacific Power respects the beliefs of the concerned customers and proposes the following choices for accommodation:

- (1) Meter relocation; or
- (2) Change the meter to a non-radio frequency meter requiring manual meter reading; or
- (3) A combination of meter relocation and changing the meter to a non-radio frequency meter requiring manual meter reading.

Pacific Power proposes that a customer who converts to a non-radio frequency meter be assessed a one-time replacement charge for the installation and later removal of the non-radio frequency meter. To help support a smoother transition for the Company and its customers during smart meter installation and recognizing customers with smart meter installations during the normal course of business will not receive notice prior to the installation; the Company proposes that installation charges apply only after January 1, 2018, and after a smart meter has been installed. If the Company installed a meter utilizing radio frequency before January 1, 2018, during the normal course of business or the customer objects prior to the installation of a radio frequency meter and the customer requests a non-radio frequency meter, the customer will not be required to pay the charge associated with the installation of a non-radio frequency meter. However, these customers will still be required to pay the charge associated with the future removal of the non-radio frequency meter. If a smart meter is installed after January 1, 2018 and the customer later requests a non-radio frequency meter, the customer will be required to pay the installation and removal charge as set forth in Schedule 300. All customers with non-radio frequency metering will be subject to recurrent charges for manually obtained monthly meter readings. The following table summarize the application of the proposed charges for installing and removing non-radio frequency meters and related manually-obtained monthly meter readings.

	Installation of non-radio frequency meter	Removal of Non-Radio Frequency Meter	Manually obtained monthly meter reading
Proposed Schedule 300 charges reflecting actual average cost	\$169	\$137	\$36
Company installs radio frequency meter before January 1, 2018, in the normal course of business	Does not apply	Applies	Applies
Customer refuses radio frequency meter before installation and after January 1, 2018, during mass smart meter deployment	Does not apply	Applies	Applies
Company installs radio frequency meter after January 1, 2018	Applies	Applies	Applies

To help further accommodate customers during this transition, Pacific Power will allow the customer to revoke their request for a non-radio frequency meter within six months of installation. If the customer requests to have the non-radio frequency meter removed the Company will install a smart meter and refund the removal charge on the customer's next billing statement. Any monthly meter reading fees charged to the customer's account during the period the non-radio frequency meter was installed will not be refunded.

Pacific Power proposes changes to Schedule 300 to reflect the Company's cost to install and remove a non-radio frequency meter. The cost associated with the installation and removal of a non-radio frequency meter was determined by analyzing similar work being performed by the Company to exchange a meter. Both the installation and removal charges incorporate average travel time, average installation time, and average time to test/restock the removed meter. The total cost for removal is \$137 and the total cost for installation is \$169. The installation cost is slightly larger than the removal costs because it includes the cost of non-radio frequency meter. Pacific Power also includes a monthly meter reading charge in Schedule 300. A monthly charge of \$36 would be assessed for a metering representative to be sent to the home each month to manually read and input the meter reading into the billing system. This \$36 charge is based on the average time to read the meter and the average incremental travel time. The work papers containing the calculations supporting these charges will be provided to the Commission work paper e-mail box concurrent with this filing.

The Company proposes that a meter exchange accommodation request may be revoked in the event that access to a non-network meter on the Customer's property is restricted, meter tampering has occurred or the customer's service has been disconnected for non-payment twice

within a 12-month period. Further, the proposed accommodation language added to Rule 8 will stipulate that customers with non-standard or non-radio frequency metering may not participate in Company-offered programs requiring a standard radio frequency meter.

Customers who select to relocate previously installed meter base equipment to a different location on the property may do so, as long as the location is satisfactory to the Company and the owner of the premises provides consent. Pacific Power's current tariffs allow for a customer to pay the costs associated with relocating the metering facilities under Rule 13, Line Extensions. Pacific Power plans to reference Rule 13 within Rule 8, Metering, under the new Non-Radio Frequency Metering Accommodation.

The costs to the customer for the meter relocation work will vary based on the specifications of each site, however, they will generally include the labor associated with removing the existing meter and installing the meter at the new location, removing the service conductor from the old location and installing service conductor to the new location, and although unlikely, the cost to relocate primary voltage conductor and a transformer. The customer will also be responsible for providing a meter-base, and depending on the specific relocation may be required to provide conduit, meter pedestal, riser with weather-head, meter pole or easements.

The proposed changes described above will affect those customers that choose a non-radio frequency (non-standard) meter; therefore the number of customers affected is not known at this time.

PacifiCorp respectfully requests that all communications related to this filing be addressed to:

Oregon Dockets  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
[oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)

Matthew McVee  
Assistant General Counsel  
825 NE Multnomah Street, Suite 1800  
Portland, OR 97232  
[matthew.mcvee@pacificorp.com](mailto:matthew.mcvee@pacificorp.com)

Jason Hoffman  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
[jason.hoffman@pacificorp.com](mailto:jason.hoffman@pacificorp.com)

Additionally, PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

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

Informal inquiries may be directed to Jason Hoffman at (503) 331-4474.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Bryce Dalley", with a long horizontal flourish extending to the right.

R. Bryce Dalley  
Vice President, Regulation

Enclosures

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**II. Metering – Direct Access****A. Direct Access Meter Requirement**

The Company's metering standard for Direct Access and Standard Offer Consumers is for remotely interrogated interval metering equipment. Direct Access and Standard Offer Consumers that do not have installed remotely interrogated interval meters may be metered using other approved Company metering equipment. In the absence of a meter installation backlog, the Company will endeavor to install standard meter equipment within 30 days of acceptance of a DASR or receipt of written or electronic authorization for Standard Offer Service. In the event of a backlog, the Company will notify the Consumer or Consumer's ESS and provide an estimate of the installation date. The Company will provide metering equipment for all Consumers.

**B. Meter Charge**

Direct Access and Standard Offer Consumers taking Company-specified metering services are obligated to pay the direct access metering charges stated in Schedule 300. Consumers taking non-standard metering services as described in Section II.E of this Rule are obligated to pay the metering charges specified in the applicable contract.

**C. Standard Services**

The Company will provide Standard Metering Services without charge to Large Nonresidential Consumers and will provide Standard Metering Services at a charge stated in Schedule 300 to Small Nonresidential Consumers. Standard Metering Services provided in conjunction with Direct Access and Standard Offer Service include:

1. An interval meter equipped with a communication modem.
2. Installation, removal, testing and maintenance of the meter.
3. Remote communication equipment. Calling fees will be passed through to the Consumer.
4. The meter readings and the results provided to ESS' will be the same as those used as the basis for the Company's charges.
5. The standard method of communicating results of meter reading is specified in the standard form of the Company's ESS Service Agreement.

**D. Standard Meter Capabilities**

These include interval and remote communication functions.

**E. Non-Standard Services**

An ESS may request that the Company provide non-standard metering capabilities, functions or services.

1. Requests must be submitted to the Company in writing.
2. The Company will consider and approve or deny the request within ten (10) business days.
3. The Company will file with the Commission rates and charges for non-standard metering capabilities, functions or services within thirty (30) days of approving a request.

Terms and conditions for approved non-standard metering capabilities, functions or services will be incorporated into the Company's ESS Service Agreement.

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**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 and removal fees 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 and the removal is in addition to any aforementioned costs to relocate the Customer's service.

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 and will be required to pay the removal charge set forth in Schedule 300 prior to the installation of the non-radio frequency meter.

If the Customer notifies the Company and objects prior to the installation of a radio frequency meter, the Customer will not be required to pay the installation charge in Schedule 300 and will be required to pay the removal charge set forth in Schedule 300 prior to the installation of the non-radio frequency meter.

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.

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.

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

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**III. Non-Radio Frequency Metering Accommodation** (continued)

If the Customer requests to have the non-radio frequency meter removed within six months of installation, the Company will install a standard, radio frequency meter and refund the removal charge on the Customer's next monthly service billing. Monthly meter reading charges assessed during the period the non-radio frequency meter was installed will not be refunded.

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:

- 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.

(N)

(N)



**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	<b>Demand Pulse Access Charge:</b>	\$1,500.00	
2	R2-4	<b>Portfolio Ballot Processing</b> First ballot processed per year All other ballots processed	Free \$5.00	
6	R6-1	<b>Meter Charges:</b> Meter Repairs/Replacement	Actual Repair/ Replacement Cost	
8	R8-1&2	<b>Meter Test for Accuracy:</b> Once in twelve months Two or more times in twelve months	No Charge \$50.00 each	
8	R8-1	<b>Meter Verification Fee</b>	\$20.00 per unit	
8	R8-2	<b>Interval Meter Charge</b> Small Nonresidential Consumers	Actual Cost	
8	R8-3	<b>Non-Radio Frequency Meter Accommodation</b> Installation of Non-Radio Frequency Meter Removal of Non-Radio Frequency Meter Monthly Meter Readings	\$169 \$137 \$36/month	(N)   (N)
9	R9-1	<b>Deposit:</b> 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	

(M) to  
 Sheet No  
 300-2

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**Service Charges (continued)**

<u>Rule No.</u>	<u>Sheet No.</u>	<u>Description</u>	<u>Charge</u>	
9	R9-1	<b>Deposit:</b> Agricultural Pumping No established credit or established high risk	amount not to exceed estimated season's billing	(M) from Sheet No 300-1  (M)
10	R10-2	<b>Late Payment Charge:</b>	1.8% of amount not paid in full each month	
10	R10-2	<b>Returned Payment Charge:</b>	\$20.00	
11B	R11B-5	<b>Reconnection Charge:</b> Request for reconnect during regular business hours: Monday through Friday, except holidays 8:00 A.M. to 5:00 P.M.	\$30.00	
		Request for reconnect during non-regular business hours: Monday through Friday, except holidays 8:00 A.M. to 6:00 P.M. *	\$75.00	
		Saturday, Sunday & Holidays 8:00 A.M. to 6:00 P.M.	\$175.00	
		*Note: No reconnections will be scheduled after 7:00 P.M.		
11B	R11B-5	<b>Pole Cut Reconnect Charge:</b> Request for reconnect during regular business hours: Monday through Friday, except holidays 8:00 A.M. to 5:00 P.M.	\$100.00	
		Request for reconnect during non-regular business hours: Monday through Friday, except holidays 8:00 A.M. to 6:00 P.M. *	\$175.00	
		Saturday, Sunday & Holidays 8:00 A.M. to 6:00 P.M.	\$275.00	
		*Note: No reconnections will be scheduled after 7:00 P.M.		
11B	R11B-5	<b>Field Visit Charge:</b>	\$20.00	
11B	R11B-5	<b>Tampering/Unauthorized Reconnection</b>	\$75.00	

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