

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: April 21, 2020**

REGULAR CONSENT EFFECTIVE DATE April 22, 2020

DATE: April 7, 2020

TO: Public Utility Commission

FROM: Yassir Rashid

THROUGH: Bryan Conway, Michael Dougherty, and Lori Koho **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) revised Meter Testing and Inspection Policy to be effective on and after April 22, 2020.

DISCUSSION:

Issue

Whether the Commission should approve the revised Meter Testing and Inspection Policy adopted by PGE, to be effective on and after April 22, 2020.

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 the current PGE Meter Test and Inspection Policy, which went into effect on February 5, 2014.¹ On November 27, 2019, PGE filed its revised Meter Test and Inspection Policy, requesting approval by the Commission by January 15, 2020. Before action was taken on the initial policy, PGE filed a revised policy for Commission approval on March 13, 2020, to be effective April 1, 2020. PGE then filed, on March 30, 2020, the revised policy that is the subject of this report, changing the effective date to April 22, 2020.

Review

Subsequent to the November 2019 PGE filing, Staff proposed edits to the Company. Staff's suggested edits focused on clarifying the information PGE should keep as part of its meter data, as well as PGE meter laboratory record keeping. Staff and PGE met on March 5, 2020, to discuss Staff's edits, and both sides agreed on changes that were incorporated in PGE's revised Meter Test and Inspection Policy that PGE filed on March 13, 2020. In its proposed revision to its meter testing and inspection policy, PGE updated the description of meters to reflect that all meters PGE uses for revenue purposes are solid-state meters. PGE's revision removes the requirement for 100 percent testing performed by PGE for meters removed from service. Rather, all meters removed from service are required to be tested prior to re-installation. The

¹ *In the Matter of PGE Application for Approval of Amended Metering Test and Inspection Policy*, Docket No. UM 1384, Order No. 14-040.

manufacturer is required to test all meters before shipment and test records are received and validated prior to acceptance testing of new meters, in accordance with ANSI C12.1-2014. Furthermore, PGE proposes the testing of meters that serve commercial/industrial customers with average load 1MW and greater to be performed biennially (every two years) instead of biannually (twice every year) as required by the current policy.

A significant revision that PGE proposes is to update the definition of acceptable accuracy tolerance limits from 100 ± 2 percent registration to 100 ± 0.3 percent registration. Meters outside of ± 0.3 percent error will be removed from service. However, meters that are subject to billing adjustments will still be those with accuracy that lie outside of ± 2 percent error subject to billing adjustments outlined in OAR 860-21-0135(6). PGE indicated that the reason for this particular revision is the fact that PGE utilizes meters that meet specifications in ANSI C12.20-2015 for Electricity Meters 0.1, 0.2, and 0.5 Accuracy Classes and test plans, which reflect higher accuracy tolerances.

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 March 30, 2020.

PROPOSED COMMISSION MOTION:

Approve PGE's revised Meter Testing and Inspection Policy effective on and after April 22, 2020.