

October 11, 2019

VIA ELECTRONIC FILING

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

Attn: Filing Center

**RE: Advice 19-011—Revision of Rule 7 – Basis of Rates
Unmetered Service for Small Usage Devices**

In compliance with ORS 757.205 and OAR 860-022-0025, PacifiCorp d/b/a Pacific Power (PacifiCorp) 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. PacifiCorp respectfully requests an effective date of November 22, 2019.

Sheet Number	Schedule/Rule	Title
First Revision of Sheet No. 7.1	Rule 7	General Rules and Regulations – Basis of Rates
First Revision of Sheet No. 7.2	Rule 7	General Rules and Regulations – Basis of Rates

The purpose of this filing is to modify Rule 7 to allow the offering of an unmetered service option for small usage devices with rated capacity of less than 2,000 watts per point of connection, when, at the sole discretion of the company, usage is impractical and/or unsafe to meter. PacifiCorp proposes this change primarily to provide flat rate service to small cell communication antennas, which support mobile communication networks in high-density areas.

As the use of mobile information devices by the general public continues to expand, the communication industry seeks to provide networks with sufficient capability to meet increased mobile communication demand. To support this increased mobile communication demand, communication infrastructure necessitates expansion of fourth generation broadband cellular network technology (4G) networks and the addition of fifth generation broadband cellular network technology (5G) networks. Providing this infrastructure support to expand 4G and introduce 5G requires the installation of small cell antennas, which provide significantly greater information data flow in areas of high density demand.

These high density demand areas are typically commercial areas that offer little or no space for meter pedestals or other non-pole mounted equipment. In many cases, additional structures in the sidewalk or parking strip are not permitted, and many local jurisdictions do not allow installation of meters on poles for aesthetic reasons. On numerous occasions, the company has

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heard from cell carriers that meter installation challenges are a major impediment to their buildout of cell networks.

This rule change would allow the company to instead bill these small usage customers on deemed usage with periodic true-ups to ensure correct collections. Billing for these devices would be determined based on deemed usage of the devices operating at 100 percent of capacity. PacifiCorp's proposed tariff revisions specify that a customer participating in this option would be required to inform the company of changes in its load with 30-days advanced notice.

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

By email (preferred): datarequest@pacificorp.com

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

Please direct any informal inquiries regarding this filing to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5394.

Sincerely,



Etta Lockey
Vice President, Regulation

Enclosures

Proposed Tariffs

Basis of Rates

Unless otherwise specifically provided in the rate schedule or contract, Company's rates are based upon the furnishing of electric service to Consumer's premises at a single point of delivery and at a single voltage and phase classification.

A. Individual Consumer: Except as specifically provided elsewhere in this Tariff, each separately operated business activity and each separate building will be considered an individual Consumer for billing purposes, except that if several buildings are occupied and used by one Consumer in the operation of a single and integrated business enterprise, the Company will furnish electric service for the entire group of buildings through one service connection at one point of delivery, provided all such buildings are at one location on the same lot or tract, or on adjoining lots or tracts forming a contiguous plot wholly occupied and used by the Consumer in the operation of such single business enterprise.

B. Reactive Power: All rate schedules in this Tariff are based upon the minimizing by Consumer of the taking of reactive power.

1. The reactive kilovolt-ampere demands may be determined either by permanently installed instruments or by test and, when determined by test, the resulting reactive demand will remain in effect until a new determination is made.
2. If Consumer installs and owns facilities needed to supply the required reactive power, suitable disconnecting switches shall be installed to automatically disconnect such facilities from Company's lines whenever Consumer's load is disconnected therefrom. When reactive power correction equipment is installed by Consumer, such equipment must be connected and switched in a manner acceptable to Company.

C. Unmetered Service:

1. **Fixed Loads:** Service to fixed loads, with fixed periods of operation, such as street lights, traffic lights, television amplifiers and other similar installations may, for the convenience and mutual benefit of the Consumer and Company, be unmetered. The average monthly use (one-twelfth of the annual use determined by test or estimated from equipment ratings) shall be billed monthly in accordance with the applicable schedule. (N)

2. **Small Usage Devices:** Devices whose total connected load does not exceed 2,000 watts per point of connection may be provided unmetered service if, at the sole discretion of the Company, usage is impractical or unsafe to meter. The monthly kWh billed each month for such small usage devices shall be determined as the total kW capacity requirement of the Customer's equipment multiplied by 730 hours. The capacity requirement shall be stated on the Customer's application for service. Connection to Company's system will be made by Company, subject to Customer's installation meeting all of Company's design and installation requirements. (N)

The Customer shall not change the capacity requirement or other aspects of their installation without first notifying the Company in writing a minimum of 30 days before changes are made. Customer's changes that render the service ineligible for unmetered service shall result in service being metered. Under such circumstances, Company approved metering point(s) must be installed by Customer within 30 days following notification or service will be disconnected. (N)

(continued)

Basis of Rates (continued)

- 2. **Small Usage Devices:** (continued)
The Company shall not be required to adjust billings due to failure of Customer's equipment. The Company shall have the right to test the capacity requirements of small usage devices from time to time. If the Company determines that the capacity was under-reported by the Customer or that the Customer otherwise failed to notify the Company of an increase in capacity, the Company may backbill for the incremental kWh associated with such increased capacity back to the date that service was first furnished in accordance with the provisions for a re-issued bill as the result of misinformation as given in Rule 10. (N)
- D. **Billing Quantities:** Charges for services provided by the Company will be based on the Company's meter readings in the manner specified in this Tariff. Charges for services provided by an ESS will generally be determined according to terms specified by the contract between the ESS and the Consumer, and may be based on different time periods, quantities or units of measure than charges for services provided by the Company. (N) (M) from R7-1
- E. **Continuing Service:** Except as specifically provided otherwise, the rates of this Tariff are based on continuing service at each service location. Disconnect and reconnect transactions shall not operate to relieve a Consumer from minimum monthly charges. (M) from R7-1
- F. **Responsible Party:** Where the property is leased or rented from the property owner and a contract minimum is attached as a condition of service, the Company may require that the owner of the property be responsible for minimums associated with the contract.
- G. **Sole Supply:** Unless otherwise stated, the rate schedules of the Company are applicable for service supplied entirely by the Company without interconnection with any source of supply.
- H. **Special Demand:** All rate schedules of this Tariff are based upon loads for which standard demand measurements adequately reflect the size of load imposed on Company's system. In the event of loads with large short-period fluctuations, Company reserves the right to employ special demand determinations.
- I. **Irrigation Service:** At the option of the Consumer, Irrigation Service may be provided under the General Service Schedule provided, however, that seasonal disconnects shall not relieve such Consumer from monthly billings for the General Service Schedule minimums.
- J. **Eligibility for Alternate General Service Schedules 23, 28 and 30:** A General Service Consumer will be moved automatically to an alternate General Service Schedule as indicated by load size and schedule applicability. The Company may move a Customer from Schedule 28 to Schedule 23 if the Customer demonstrates an ability to limit demand to a level that does not exceed 30 kW either through the use of demand limiting equipment or through other operational changes. The Company will not switch a Consumer between alternate General Service Schedules 23, 28 and 30 more than once in a 12-month period, unless the following exception is met: In the event that a Consumer's load increases due to changes in operations, the Company may, at its discretion, place the Consumer on a schedule with a higher demand requirement, if so warranted.