

April 11, 2003

**Advice 2369-E
(Pacific Gas and Electric Company ID U 39 E)**

Public Utilities Commission of the State of California (CPUC)

Subject: Modifications to clarify Electric Rule 17 - *Meter Tests and Adjustment of Bills for Meter Error.*

Pacific Gas and Electric Company (PG&E) hereby submits for filing revisions to its electric Rule 17. The affected Rule 17 sheets are listed on the enclosed Attachment I.¹

Purpose

The purpose of this filing is to submit modifications to clarify Electric Rule 17 — *Meter Tests and Adjustment of Bills for Meter Error* along with reasons for the modifications. These modifications will allow PG&E to improve its practices on electric meter reuse and testing.

Background and Reasons

PG&E and other utilities in California are currently performing meter testing at or prior to the time of installation in accordance with their Electric Rule 17 or equivalent tariff. PG&E's existing Electric Rule 17 includes language for accuracy testing of all electric meters at the time of installation. PG&E proposes to revise language in PG&E Electric Rule 17 to provide needed clarity and to specifically allow the testing of all electric meters *at or prior to* the time of installation.

¹ PG&E reserves all legal rights to challenge the decisions or statutes under which it has been required to make this advice filing, and nothing in this advice filing constitutes a waiver of such rights. Also, PG&E reserves any additional legal rights to challenge the requirement to make this advice filing by reason of its status as a debtor under Chapter 11 of the Bankruptcy Code, and nothing in this advice filing constitutes a waiver of such rights.

This revision would make PG&E's Electric Rule 17 consistent with Southern California Edison (SCE) Electric Rule 17.B.1., which states:

"Meter Tests. Prior to Installation. Every meter will be tested at or prior to the time of installation, ..."

Further, modifications to PG&E's Electric Rule 17 will allow PG&E to improve its practices of electric meter reuse. Presently, in-service electric meters, after removal at a customer's service location, are sent from over 70 service centers scattered throughout PG&E service territory to a central meter plant in Fremont. At Fremont, these meters are sorted for retirement or reuse. If a meter cannot be economically returned to service, it is retired. Meters which can be economically returned to service are cleaned, refurbished as necessary, tested and put back in central meter inventory. Transporting meters from one customer's service point, where the meter is in good working condition, over such a wide PG&E service territory results in high shipping costs, excessive meters in transit, and therefore an uneconomically high meter inventory level. To remedy this, a new simplified process is proposed to reuse electric meters after removal in the field without shipping them back to our central meter plant for cleaning and testing.

The proposed meter reuse process will be performed by field personnel through a verification of meter operations. Reusable meters will be immediately placed back in local meter inventory. The meter reuse process described here is consistent with SCE's meter reuse practice.

In addition to the efficient recycling of reusable electric meters, PG&E will concurrently expand its statistically based electric meter field testing program to ensure all categories of electric meters used at PG&E are included and that the accuracy of the entire meter population can be effectively monitored and improved. This expanded field-testing will provide a more comprehensive, statistically sound profile of in-service meters.

Such new and simplified electric metering practices will benefit the ratepayers in the long term by reducing costs through reduced electric meter inventory while maintaining the accuracy of in-service electric meters.

This filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any other rate schedule or rule.

Protests

Anyone wishing to protest this filing may do so by sending a letter by **May 1, 2003**, which is 20 days from the date of this filing. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. Protests should be mailed to:

IMC Branch Chief – Energy Division
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102
Facsimile: (415) 703-2200
E-mail: jjr@cpuc.ca.gov

Protests also should be sent by e-mail and facsimile to Mr. Jerry Royer, Energy Division, as shown above, and by U.S. mail to Mr. Royer at the above address.

The protest should be sent via both e-mail and facsimile to PG&E on the same date it is mailed or delivered to the Commission at the address shown below.

Pacific Gas and Electric Company
Attention: Brian Cherry
Director, Regulatory Relations
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177
Facsimile: (415) 973-7226
E-mail: RxDd@pge.com

Effective Date

PG&E requests that this advice filing become effective on **May 21, 2003**, which is 40 days from the date of filing, upon approval by the Energy Division.

Notice

In accordance with General Order 96-A, Section III, Paragraph G, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list. Address changes should be directed to Sandra Ciach at (415) 973-7572. Advice letter filings can also be accessed electronically at:

http://www.pge.com/customer_services/business/tariffs/

Vice President - Regulatory Relations

Attachment(s)



RULE 17—METER TESTS AND ADJUSTMENT OF BILLS FOR METER ERROR

A. METER TESTS

Any Customer electing bundled utility service may, upon not less than five working days notice, require PG&E to test the utility's electric meter. No payment or deposit will be required from the Customer for such tests except when a Customer whose average monthly bill for electric service is less than \$150 requests a meter test within six months after date of installation of the meter, or more often than once each six months thereafter, a deposit to cover the reasonable cost of the test will be required of the Customer, in accordance with the following:

1. Meter Installed Without Current or Potential Transformers

| | |
|---------------------------------|------------------|
| Meters 10 ampere or less | \$1.00 per meter |
| Meters 15 and 25 ampere | \$2.00 per meter |
| Meters 50 ampere and over | \$3.00 per meter |

2. Meter Installed With Current Transformer or With Current and Potential Transformer

\$5.00 per meter

The deposit will be returned to the Customer if the meter is found, upon testing, to register more than two percent fast or slow under conditions of normal operation.

A Customer shall have the right to require PG&E to conduct the test in the Customer's presence, or in the presence of an expert or other representative appointed by the Customer. A report giving the result of the test will be supplied to the Customer within a reasonable time after completion of the test.

All electric meters will be tested at or prior to the time of their installation. No meter will be placed in service or allowed to remain in service which has an error in registration in excess of two percent under conditions of normal operation. On newly purchased meters, the manufacturer's test may be used as the installation test when PG&E's random tests indicate satisfactory test results for a particular manufacturer and for a particular shipment. (T)

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