

September 8, 2000

**ADVICE 2263-G**

(Pacific Gas and Electric Company ID U39 G)

Public Utilities Commission of the State of California

**Subject--Request For Modification of Deviation from Rule 13(a) of General Order 58-A--Revision of Gas Meter Performance Control Program**

Pacific Gas and Electric Company (the Company) hereby requests Commission approval to amend its current Gas Meter Control Program (Program) under Rule 13(a) of General Order 58-A for testing and controlling gas meter performance. The requested revision will allow gas meters to be utilized to their maximum potential, maintain or improve gas metering accuracy, and reduce expenses for the Company's customers.

**Purpose**

The Company is requesting to expand its existing Program, which currently applies to all gas meters with capacities of up to 500 cubic feet per hour, to include all gas meters rated between 501 cubic feet per hour (CFH) and 1000 CFH.

**Background**

In accordance with Section 13(a) of General Order 58-A, the original Program provided for testing every ten (10) years gas meters rated 500 CFH or less. Rule 13(c) of General Order 58-A specifies that, "Under certain conditions utilities may be authorized to deviate from Rule 13(a) and use a statistical meter control program based on meter performance as demonstrated by sample testing in lieu of periodic testing of each meter. Applications to deviate shall be based on accepted principles of statistical sampling."

Accordingly, in R. G-1569 dated December 13, 1972, the Commission granted the Company's request to deviate from the fixed 10-year testing requirement for gas meters with capacity of 300 CFH or less, based on meter performance. On June 25, 1986, in R. G-2681, the Commission authorized expanding the Program to include

meters in the range of 300 to 500 CFH. Each year, the Company submits a report to the Commission containing Program results for the previous year.

### **Program Benefits**

The Company's gas meter testing personnel have determined through experience that larger meters generally retain an appropriate level of accuracy beyond ten years. Such meters are designed, built, and operated in a similar manner as the domestic gas meters currently covered by the Gas Meter Performance Control Program. Attachment I -- *Pacific Gas and Electric Company Gas Meter Test Results (500 CFH to 1000 CFH) 1995-1999*, analyzes the test results of the meters that are included in this proposal.

The revision to the Program proposed herein will benefit customers by:

1. Improving the overall accuracy of the Company's gas metering by using statistical meter change programs to identify inaccurate groups of meters faster than the 10-year meter change-out program, thereby assuring that customers are billed, correctly and equitably.
2. Providing more accurate measurement of gas delivered to customers by expediting the testing, adjusting, and/or removal of groups of meters that are more than two percent fast, thereby facilitating any necessary billing corrections and credit adjustments to individual customers.
3. Optimizing gas meter operating costs by extending the life of gas meters in service, thereby providing savings to customers of approximately \$450,000 per year in operational costs.

This filing will not increase any rate or charge, conflict with other schedules or rules, nor cause the withdrawal of service.

### **Protests**

Anyone wishing to protest this filing may do so by sending a letter within 20 days of the date of this filing. The protest must state the grounds upon which it is based, and should be submitted expeditiously. Protests should be sent by U.S. mail and via facsimile to:

IMC Branch Chief  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue, Room 4002  
San Francisco, CA 94102  
Facsimile: (415) 703-2200

Copies should also be mailed to the attention of the Director, Energy Division, Room 4005 and Jerry Royer, Energy Division, at the address shown above.

It is also requested that a copy of the protest be sent via postal mail and facsimile to Pacific Gas and Electric Company on the same date it is mailed or delivered to the Commission at the address shown below.

Pacific Gas and Electric Company  
Attention: Les Guliasi  
Manager, Regulatory Relations  
77 Beale Street, Mailcode B10C  
P.O. Box 770000  
San Francisco, CA 94177  
Facsimile: (415) 973-7226

### **Effective Date**

PG&E requests that this filing become effective upon regular notice, **October 18, 2000**, which is 40 days after the date of this filing.<sup>1</sup>

### **Notice**

In accordance with Section III, Paragraph G, of General Order 96-A, 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 Nelia Avendano at (415) 973-3529.

Vice President - Regulatory Relations

Attachments

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<sup>1</sup> The Commission, in R. G-3061, authorized San Diego Gas and Electric Company to include gas meters with capacities up to 1000 CFH in its gas meter control Program. Previous revisions to PG&E's Program under General Order 58-A have been approved by Commission resolution.