DECISION MEMORANDUM

TO: COMMISSIONER KJELLANDER COMMISSIONER RAPER COMMISSIONER ANDERSON COMMISSION SECRETARY LEGAL WORKING FILE

FROM: JOHNATHAN FARLEY

- **DATE: AUGUST 31, 2018**
- SUBJECT: IN THE MATTER OF THE APPLICATION OF AVISTA CORPORATION DBA AVISTA UTILITIES FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR ELECTRIC AND NATURAL GAS SERVICE IN IDAHO (CASE NOS. AVU-E-17-01/AVU-G-17-01)

COMPLIANCE WITH STIPULATION NO. 20 OF SETTLEMENT AGREEMENT

BACKGROUND

On December 28, 2017, the Commission approved a settlement in the Avista general rate

case. Order No. 33952. Part of the approved Settlement Agreement reads:

20. Natural Gas Meter Placement Rules. The Company and interested parties will meet and confer to review its meter placement and protection policies and practices and determine based on the agreement of the parties, what additional steps should be taken to revise the Company's current policies and practices. Any necessary changes requiring Commission approval, e.g., tariff revisions, will be submitted by the Company on or before July 1, 2018.

On June 25, 2018, Avista filed a motion requesting to extend the filing deadline from July 1, 2018, to October 1, 2018, to allow sufficient time to complete the work. Order No. 34102. Subsequently, Staff and the Company discussed standards, procedures and implementation plans. Both Staff and the Company agree that no tariff revisions are required. No other parties have expressed an interest in this matter. On August 22, 2018, Staff performed a final review of Avista's written materials and discussed the Company's outreach strategy.

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Meter Placement and Protection

The Company and Staff developed written materials outlining the proper placement of gas meter-sets. In addition to general placement requirements, the Company developed criteria for mitigating hazards posed by falling snow and ice in areas with heavy snow loads. The Company's new materials include updated placement standards, design criteria for custom meter protection structures, and designations of areas considered to be heavy snow load locales. All materials provided to the Commission Staff have been placed in the AVU-E-17-01 and AVU-G-17-01 case files.

Public Outreach

The Company developed an outreach strategy to disseminate the new placement and protection materials. The Company also developed engineering criteria for designing custom meter protection structures. Attachment 2. It created a brochure outlining the new meter placement standards and meter protection requirements. Attachment 1. The Company will make copies of the brochure and design criteria available to the public at each of its Customer Project Coordinator offices throughout its Idaho, Washington, and Oregon service territories. In addition, the Company will include the meter placement and protection brochure and the engineering design criteria on its website.

The second piece of the Company's outreach strategy is to contact Avista contractors and vendors. The Company has approximately 27,000 contractors and vendors that operate within its service territories in Idaho, Oregon, and Washington. The Company currently sends out a semiannual newsletter to contactors and vendors in March and October of each year. The Company has indicated that the October 2018 and March 2019 newsletters will address the new meter placement and protection standards and indicate where to find more information on the subject.

STAFF RECOMMEDATION

Staff has reviewed all of the Company's submitted materials and believes they fulfill the requirements of the Settlement Agreement. Staff recommends the Commission accept Avista's submitted materials in compliance with Order No. 33952.

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COMMISSION DECISION

Does the Commission accept Avista's submitted materials in compliance with Order No. 33952?

Johnathan Farley

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AVISTA

Natural Gas Meter Location Guidelines

Avista is committed to the safety of our customers. It's why we have specific requirements concerning the location of your natural gas meter. This simple guide shows clearances and other important measures to prevent potential hazards and keep everyone safe.

Any opening below the meter service regulator vent should be at least 1 foot away (foundation vent, window, dryer vent, etc.) Meter service regulator vent should not be within 3 feet of ignition sources, including:
electric meter

- electric outlets
- electric switches
- air conditioner condenser
- appliance vents
- combustion air vents to fireplaces and/or heating appliances

The meter service regulator vent must be at least 10 feet from mechanical air intakes.

Meters should not be located under any porch, deck patio or similar enclosure where regulator venting and accessibility are limited.



*In Oregon, electric provider PP&L requires a 3-foot minimum horizontal distance to any part of the gas meter. In all other areas, a 3-foot radial distance from the meter service regulator vent is required.

Gas meter sheltered below forward-sloping roof



Gas meter sheltered below gable roof



SIDE VIEW

In areas prone to heavy snowfall (see below), protect the meter from snow and ice by locating it under a roof overhang of at least 12 inches from the dripline to the front face of the meter or on the gable end of the building. If this is not possible, a snow shed should be installed. Avista-provided snow sheds are the preferred option. The customer also may build and install their own Avista-approved snow shed (see design details at myavista.com/safety).

PLEASE NOTE: Areas prone to heavy snowfall include the following counties: Bonner (ID), Boundary (ID), Klamath (OR), Klickltat (WA), Kootenai (ID), Lake (OR), Latah (ID), Lincoln (WA), Shoshone (ID), Spokane (WA), Stevens (WA), Union (OR) and Whitman (WA).

Meter should be located within 3 feet of where the house line enters the building, and not typically extend more than 1 foot from the building.

Meter should be easily accessible for readings and maintenance.

Meter should be protected from potential damage by a vehicle. (If the location cannot provide this protection, Avista will install a protective barricade or one or more bollards.)

Thank you for being our partner in safety. For more information go to myavista.com or call 1-800-227-9187.



Customer Provided "Snow Shed" Design Requirements

At Avista, we want our customers to be safe. This is why in areas that have the potential to experience heavy snowfall, the gas meter should be installed at the gable end of the building to protect the meter from falling snow and ice. Areas prone to heavy snowfall include the following counties: Bonner (ID), Boundary (ID), Klamath (OR), Klickitat (WA), Kootenai (ID), Lake (OR), Latah (ID), Lincoln (WA), Shoshone (ID), Spokane (WA), Stevens (WA), Union (OR), and Whitman (WA). If the meter cannot be installed at the gable end of the building, a "snow shed" must be installed to provide meter protection if the roof overhang is not sufficient to protect the meter from falling snow and ice. A company provided snow shed is the preferred option; however, customers may elect to install their own cover. Customers who opt to use their own snow shed are responsible for its design and construction. Avista requires that a customer provided snow shed has a design that is stamped by a Professional Engineer and approved by Avista. Customer provided snow sheds shall be structurally sound and meet all of the requirements discussed below. For any additional information, please call 1-800-227-9187.



1	The snow shed shall be designed to withstand a uniform pressure of 500 pounds per square foot distributed over the top surface of the structure. The snow shed must not deform or fail under this design load.	4	The snow shed must be corrosion resistant, through the use of galvanized metals, paint, or other corrosion resistant materials. It must also be free standing, and cannot be attached to the meter assembly in any way.
2	A minimum of 12" of clearance between the top of the meter set and the snow shed shall be provided.	5	The snow shed shall allow natural ventilation to mitigate accumulation of natural gas.
3	The snow shed must cover the entire width of the meter set, with an additional 8" (minimum) on either side to allow accessibility for maintenance.	6	The snow shed must provide a minimum of 8" of overhang, measured from the front face of the meter.