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IDAHO PUBLIC
UTILITIES COMMISSION

December 6, 2021

Ms. Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

RE: Case No. INT-G-21-08

Dear Ms. Noriyuki:

Attached for consideration by this Commission is an electronic submission of Intermountain Gas Company's Application for Authority to Revise Its Electronic Receiver Transmitter Drive Rate Programming and Verification Process.

If you should have any questions regarding the attached, please don't hesitate to contact me at (208) 377-6015.

Sincerely,

Lori A. Blattner
Director, Regulatory Affairs
Intermountain Gas Company

Enclosure

cc: Mark Chiles
Preston Carter

INTERMOUNTAIN GAS COMPANY

CASE NO. INT-G-21-08

APPLICATION

**In the Matter of the Application of INTERMOUNTAIN GAS COMPANY
For Authority to Revise Its Electronic Receiver Transmitter Drive Rate
Programming and Verification Process**

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Attorneys for Intermountain Gas Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

In the Matter of the Application of
INTERMOUNTAIN GAS COMPANY
for Authority to Revise Its Electronic
Receiver Transmitter Drive Rate
Programming and Verification Process

Case No. INT-G-21-08

APPLICATION

Intermountain Gas Company (“Intermountain” or “Company”), a subsidiary of MDU Resources Group, Inc. with general offices located at 555 South Cole Road, Boise, Idaho, pursuant to the Rules of Procedure of the Idaho Public Utilities Commission (“Commission”), requests authority to revise the Company’s Electronic Receiver Transmitter (“ERT”) drive rate programming and verification process. Currently, Company employees verify the drive rate programmed in the ERT matches the meter at the time of meter installation, and if the ERT is newly installed on the meter, the ERT is programmed at that time. Within 30 days of the meter installation, Company employees perform an audit to verify again the drive rate programming in the ERT matches the installed meter. For reasons described more fully in this Application, the Company believes that the 30-day verification is no longer necessary due to recent procedural changes.

Please address communications regarding this Application to:

Lori A. Blattner
Director – Regulatory Affairs
Intermountain Gas Company
Post Office Box 7608
Boise, Idaho 83707
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and

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In support of this Application, Intermountain alleges and states as follows:

I. INTRODUCTION

Intermountain is a gas utility, subject to the jurisdiction of the Commission, engaged in the sale of and distribution of natural gas within the State of Idaho under authority of Commission Certificate No. 219, issued December 2, 1955, as amended and supplemented by Order No. 6564, dated October 3, 1962.

Intermountain provides natural gas service to the following Idaho communities and counties and adjoining areas:

Ada County - Boise, Eagle, Garden City, Kuna, Meridian, and Star;
Bannock County - Arimo, Chubbuck, Inkom, Lava Hot Springs, McCammon, and Pocatello;
Bear Lake County - Georgetown, and Montpelier;
Bingham County - Aberdeen, Basalt, Blackfoot, Firth, Fort Hall, Moreland/Riverside, and Shelley;
Blaine County - Bellevue, Hailey, Ketchum, and Sun Valley;
Bonneville County - Ammon, Idaho Falls, Iona, and Ucon;
Canyon County - Caldwell, Greenleaf, Middleton, Nampa, Parma, and Wilder;
Caribou County - Bancroft, Grace, and Soda Springs;
Cassia County - Burley, Declo, Malta, and Raft River;
Elmore County - Glens Ferry, Hammett, and Mountain Home;
Fremont County - Parker, and St. Anthony;
Gem County - Emmett;
Gooding County - Bliss, Gooding, and Wendell;
Jefferson County - Lewisville, Menan, Rigby, and Ririe;
Jerome County - Jerome;
Lincoln County - Shoshone;
Madison County - Rexburg, and Sugar City;
Minidoka County - Heyburn, Paul, and Rupert;
Owyhee County - Bruneau, Marsing, and Homedale;
Payette County - Fruitland, New Plymouth, and Payette;
Power County - American Falls;
Twin Falls County - Buhl, Filer, Hansen, Kimberly, Murtaugh, and Twin Falls;
Washington County - Weiser.

Intermountain's properties in these locations consist of transmission pipelines, liquefied natural gas storage facilities, compressor stations, distribution mains, services, meters and regulators, and general plant and equipment.

II. BACKGROUND

In 2008, the Company worked with the Commission Staff to develop a Memorandum of Understanding ("MOU") regarding guidelines for inaccurately billed service. In conjunction with the MOU, although not specifically mentioned in the MOU, the Company instituted a practice of performing an audit 30 days after meter installation to verify the drive rate programming in the ERT matched the installed meter.

The MOU and the 30-day audit were prompted by two formal customer complaints involving billing errors arising from a mismatch between the meter drive rate and the drive rate programmed into the ERT (see Case Nos. INT-G-06-01 and INT-G-07-02). The drive rate represents the amount of gas consumed during one cycle of the diaphragm within the meter. For example, a two-foot drive rate represents two cubic feet of gas consumed with each cycle of the diaphragm. In both formal complaints mentioned above, the ERT was programmed with a one-foot drive rate while the meter itself was constructed with a two-foot drive rate. Because the ERT is responsible for wirelessly transmitting the consumption data to the Company's billing system, this mismatch in drive rates caused the gas consumption used for billing purposes to be exactly one half of the actual amount of gas consumed.

Currently, Company employees verify the drive rate programming in the ERT matches the drive rate of the meter at the time of meter installation, and if the ERT is newly installed on the meter, the ERT is programmed at that time. Within 30 days of the meter installation, Company employees perform an audit to verify again that the drive rate programming in the

ERT matches the installed meter. The current process provides two verifications that the drive rate programming in the ERT matches the installed meter. While the current process addressed the problems identified in 2006 and 2007, the Company has identified a new process, explained below, that is accurate, reliable, and renders unnecessary the 30-day audit.

III. PROPOSAL

Because of changes in Intermountain's procedures, the Company proposes to revise its ERT drive rate programming and verification process. The ERT drive rate will be programmed at the meter manufacturer's facility or in the Company's Meter Shop and the ERT drive rate programming will be verified at the time of meter installation. This proposal provides two verifications and makes the 30-day audit an unnecessary third verification. For the reasons outlined below, the Company believes this proposal will continue to allow the Company to reduce and quickly catch mismatches in the drive rate between the ERT and installed meter while avoiding the expenses associated with the 30-day audit.

The Company is currently working towards a two-foot drive standard for all its residential meters by converting all one-foot drive meters to two-foot drive meters and only purchasing new meters with two-foot drives. Standardizing all residential meters to two-foot drives will eliminate variability that could cause a mismatch between the meter and ERT drive rates.

Intermountain notes that all new residential meters purchased with ERTs will be programmed at the meter manufacturer's facility with a two-foot drive rate. These ERTs are programmed in batches at the facility reducing the potential for human error which may occur if each individual ERT is programmed by a Company employee at the time of meter installation. For one-foot drive meters converted to two-foot drives, the Meter Shop reprograms the ERT to a two-foot drive rate.

For all new ERTs programmed in the meter manufacturer's facility, the Meter Shop performs a sample audit of the ERTs to check that they are programmed as a two-foot drive. At the time of installation, Company employees verify the ERT drive rate matches the installed meter. For one-foot drive meters converted to two-foot drives, the ERTs are reprogrammed in the Meter Shop and verified at the time of installation. The new process of programming the ERT before installation and then verifying the ERT at the time of installation provides the two verifications that were envisioned under the procedure that has been in place since 2008.

Intermountain implemented the changes described above in June and continued to perform the 30-day audit. Since implementing the changes, the Company has only had one drive rate error caught by the 30-day audit as seen in the table below. The ERT involved in this error was programmed correctly at the meter manufacturer's facility, however, the employee misprogrammed the ERT at the time of installation. Employees have received additional training to not program ERTs at the time of installation unless the programming is incorrect.

Date	Install Meter Audits	Install Drive Rate Incorrect	30-Day Meter Audits	30-Day Drive Rate Incorrect
Jun 2021	1,758	-	1,986	-
Jul 2021	2,327	-	1,882	1
Aug 2021	1,921	-	2,011	-
Sep 2021	1,805	-	1,645	-
Oct 2021	1,562	-	2,122	-
Total	9,373	-	9,646	1
Rate		0.000%		0.010%

Based on the processes explained above and the data presented in this table, the Company believes that it is no longer necessary to perform an additional 30-day audit to verify the drive rate

programming in the ERT matches the installed meter. The Company believes that removing this unnecessary step will reduce costs and streamline the process for installing meters.

IV. MODIFIED PROCEDURE

Intermountain requests that this matter be handled under modified procedure pursuant to Rules 201-204 of the Commission's Rules of Procedure. Intermountain stands ready for immediate consideration of this matter.

V. REQUEST FOR RELIEF

Intermountain respectfully petitions the Idaho Public Utilities Commission as follows:

- a. That the Company be granted authority to revise its ERT drive rate programming and verification process as explained above,
 - b. That this Application be heard and acted upon without hearing under modified procedure,
- and
- c. For such other relief as this Commission may determine proper.

DATED: December 6, 2021.

INTERMOUNTAIN GAS COMPANY

By



Lori A. Blattner

Director – Regulatory Affairs

GIVENS PURSLEY LLP

By



Preston N. Carter

Attorney for Intermountain Gas Company