

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF INTERMOUNTAIN) CASE NO. INT-G-21-08
GAS COMPANY’S APPLICATION TO)
REVISE ITS ELECTRONIC RECEIVER)
TRANSMITTER DRIVE RATE) ORDER NO. 35359
PROGRAMMING AND VERIFICATION)
PROCESS)
)

On December 6, 2021, Intermountain Gas Company (“Company”) applied to the Idaho Public Utilities Commission (“Commission”) to revise its current electronic receiver transmitter (“ERT”) drive rate and verification process. *Application* at 1. Currently, the Company audits each newly installed ERT unit within 30 days of installation to verify that the programming rate matches the meter. *Id.* The Company revised its procedures for verifying each ERT drive and meter and believed the 30-day audit is no longer necessary. *Id.*

On December 28, 2021, the Commission issued a Notice of Application and Notice of Modified Procedure setting comment deadlines for the public and the Company’s reply. *See* Order No. 35275. Staff filed comments to which the Company did not reply.

Now, the Commission issues this final Order granting the Company’s Application, allowing it to revise its current ERT drive rate and verification process by eliminating the 30-day audit.

BACKGROUND

In 2008, after receiving two formal complaints involving billing errors arising from a mismatch between the meter drive rate and drive rate programmed into the ERT, the Company worked with Staff to develop a Memorandum of Understanding (“MOU”) regarding guidelines for inaccurately billed service. *Staff Comments* at 1-2. Based upon the MOU, the Company instituted a 30-day audit practice after installation to verify the ERT drive rate programming matched the installed meter drive rate.¹ *Id.* at 2.

The drive rate represents the amount of gas consumed during one cycle of the diaphragm within the meter. *Id.* In the previous formal complaints, the ERT drives were

¹ Case Nos. INT-G-06-01 and INT-G-07-02.

programmed with a one-foot drive rate while the meters were constructed with a two-foot drive rate. *Id.* This mismatch in drive rates caused the gas consumed for billing purposes to be exactly one half of the actual amount of gas consumed. *Id.*

THE APPLICATION

The Company is working toward a two-foot ERT drive standard for all residential meters believing that doing so will eliminate variability that could otherwise cause a mismatch between the meter and ERT drive rates. *Application* at 5. All new residential meters purchased with ERT's will be programmed at the meter manufacturer's facility with a two-foot drive rate. *Id.* For one-foot drive meters that are converted to two-foot drive meters, the Company stated that the meter shop will reprogram the ERT to a two-foot drive rate. *Id.* The Company stated that all ERTs programmed or re-programmed at the manufacturer's facility were audited to verify that the ERTs were programmed with two-foot drive rates. *Id.* at 6. The Company believed the new process of programming the ERT before installation and then verifying the ERT at the time of installation provided the two-step verification process envisioned under the MOU. *Id.* The Company represented that only one error has occurred during the new process and it was due to operator-error. *Id.* Accordingly, the Company believes the current 30-day audit process is no longer necessary. *Id.* at 7.

STAFF COMMENTS

Staff recommended the Commission approve the Company's Application as filed. *Staff Comments* at 2. Staff believed the Company's proposed modification and discontinuance of a 30-day post installation audit were within the Company's discretion. *Id.* Staff believed the Company's proposal complied with Customer Service Rule 203, IDAPA 31.21.01.203. *Id.* The Company provided data to Staff which showed an incorrect drive rate of 0.141 percent. *Staff Comments* at 2. Staff believed the Company's proposal was reasonable given this low rate of error. *Id.*

Staff verified that two-foot drive meters, when calibrated correctly, are more likely to prevent errors. *Id.* at 3. Staff also verified the Company's documentation process and verified that the Company records meter information, meter test results, and programming verification information for each meter at the time of installation. *Id.* Staff represented that this process serves as a checklist for the installer to ensure that the meter drive rate matches the drive rate programmed into the ERT. *Id.* Staff also represented that the data would allow the Company to track and identify issues with meters to correct if necessary. *Id.*

Staff stated that the Company revised its billing audit process to better identify when customer usage indicates a problem with the meters, including the ERTs and stated that the verification process as proposed in the Application would not affect rates or require customer notification, *Id.* at 4.

COMMISSION FINDINGS AND DECISION

The Company is a gas corporation and public utility as defined in *Idaho Code* §§ 61-117 and -129. The Commission has jurisdiction over the Company and the issues in this case under Title 61 of the Idaho Code, including *Idaho Code* §§ 61-501 and -503. The Commission is empowered to investigate and modify Company rules and regulations. *Idaho Code* § 61-503. We find the Company's proposed revision to eliminate the 30-day drive rate audit in its ERT drive rate programming and verification process established in the MOU is reasonable given the evidence of the Company's low rate of error and the plans to audit the installation process. The Commission encourages the Company to continue training employees to verify that ERT drive-rates are programmed and matched correctly with the installed or constructed meter rate.

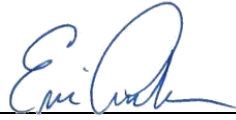
ORDER

IT IS HEREBY ORDERED that the Company's Application is granted. The Company may revise its ERT drive rate programming and verification process to eliminate the 30-day drive rate audit.

THIS IS A FINAL ORDER. Any person interested in this Order may petition for reconsideration within twenty-one (21) days of the service date of this Order with regard to any matter decided in this Order. Within seven (7) days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. *See Idaho Code* § 61-626.

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DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 30th day of March 2022.



ERIC ANDERSON, PRESIDENT

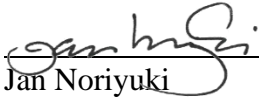


JOHN CHATBURN, COMMISSIONER



JOHN R. HAMMOND JR., COMMISSIONER

ATTEST:



Jan Noriyuki
Commission Secretary

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