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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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

COMES NOW the Staff of the Idaho Public Utilities Commission, ("Staff") by and through its Attorney of record, Taylor Brooks, Deputy Attorney General, and submits the following comments:

BACKGROUND

On December 6, 2021, Intermountain Gas Company ("the Company") applied to revise its current electronic receiver transmitter ("ERT") drive rate and verification process. Currently, the Company audits each ERT unit within thirty (30) days of installation to verify the programming rate and ensure that it matches the installed meter. The Company has revised its procedures for verifying ERT drives and meters and believes the current 30-day audit is no longer necessary.

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. Based upon the MOU’s purpose, the Company instituted a 30-day-audit practice after meter installation to verify the ERT drive rate programming to ensure that the drive rate matched the installed meter.¹

The drive rate represents the amount of gas consumed during one cycle of the diaphragm within the meter. In the above-mentioned formal complaints, the ERT drives were programmed with a one-foot drive rate while the meters were constructed with a two-foot drive rate. 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.

STAFF ANALYSIS

Staff reviewed the Company’s Application, the 2007 MOU, and responses to production requests. The Company is proposing a modified ERT programming and verification process in which the ERT drive rate is set at either the meter manufacturer’s facility or at the Company’s meter shop. Additionally, at time of installation, the ERT drive rate programming will be verified. The Company states that this proposal provides two verifications and makes a third verification, the 30-day audit, unnecessary. *Application* at 5. In addition, Staff believes the Company’s proposed process modifications and discontinuance of 30-day post installation meter audits are within the Company’s purview to provide service that complies with Customer Service Rule 203.²

Currently, the Company verifies the drive rate 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 installation and programming, the Company audits meters to verify that the drive rate programming in the ERT matches the installed meter. In Staff’s first Production Request, Staff asked for data regarding the number of 30-day meter audits conducted and the number of incorrect drive rates found. The Company responded by providing data from June 2019 through June 2021, which showed an incorrect drive rate of 0.141 percent. Staff believes that the Company’s proposal to eliminate the 30-day audit is reasonable based on the low number of incorrect drive rates found in the audit process.

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

² <https://adminrules.idaho.gov/rules/current/31/312101.pdf>

The Company is working to convert all one-foot drive meters to two-foot drive meters and states that it is only purchasing new meters with two-foot drives in order to standardize all residential meters to two-foot drives. In Staff's second Production Request, Staff questioned the number of one-foot drive rate meters in service and when they will be converted or replaced by two-foot drive rate meters. The Company responded with an estimate that it will convert 4,000 one-foot meters to two-foot and retire an additional 1,500 one-foot meters annually.

For all new ERT's programmed in the meter manufacturer's facility, the Company states that its meter shop performs a sample audit of the ERTs to check that they are programmed as a two-foot drive. The Company also asserts that the current one-foot drive meters are reprogrammed in the Company's meter shop and then verified at the time of installation. The Company represents that this process provides the two verifications envisioned in 2008 after entering into the MOU with Staff.

Staff analyzed the Company's 30-day audit records to determine if there was evidence that the new process was lowering the incidents where a meter was calibrated incorrectly. Though the information was limited to the seven months since the new process was implemented, the process appears to prevent errors. Since the new process was implemented, there has only been one incidence where the 30-day audit caught a drive rate error, for a 0.008% error rate. During the previous two years the error rate was 0.160%. Staff believes the new process has reduced the number of drive rate errors.

Staff also reviewed documentation the Company maintains for each meter to ensure the ERT programming and verification process steps are recorded. The Company records meter information, meter test results, and programming verification information for each meter at the time of installation, serving as a checklist for the installer to ensure that the meter drive rate and drive rate programmed into the ERT match. The data will also allow the Company to track and identify other issues with meters that can lead to billing errors.

CUSTOMER COMMENTS, NOTICE, AND PRESS RELEASE

Staff reviewed the August 2007 MOU and believes the document remains applicable and should remain in force. Rebilling as described in the MOU is in alignment with the Commission's Utility Customer Relations Rules (UCRR), IDAPA 31-21-01, Rule 203. The Company has also revised both its billing audit process to quickly identify when customer usage

indicates a problem with the meters, including the ERTs; and its process to estimate usage in the event of meter failure utilizing previous usage when available, estimated usage, if necessary, in addition to local historical Heating Degree Days (HDD) in an Excel spreadsheet.

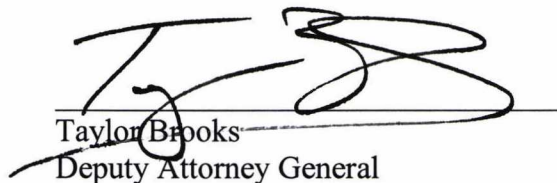
Staff has identified eleven rebilling complaints received by the Commission over the past seven years. The complaints reviewed were the result of meter failure and not the result of incorrect programming of drive rates.

The verification process and its proposed modification to remove a final field audit does not affect rates and does not require customer notification as called for under the Commission's Rules of Procedure 31.01.01.

STAFF RECOMMENDATIONS

After examining the Company's Application and responses to Production Requests, Staff recommends the Commission approve the Company's proposed revisions to its Electronic Receiver Transmitter Drive Rate Programming and Verification Process eliminating the 30-day drive rate audit.

Respectfully submitted this 24th day of February 2022.



Taylor Brooks
Deputy Attorney General

Technical Staff: Kevin Keyt
Michael Eldred
Chris Hecht
Joseph Terry

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 24th DAY OF FEBRUARY 2022, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. INT-G-21-08, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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