



Chris May <chris@streetroots.org>

Response to your questions.

Week, Stefanie <Stefanie.Week@nwnatural.com>
To: Chris May <chris@streetroots.org>

Fri, May 13, 2022 at 7:31 PM

Hi Chris,

While we understand that your methodologies are in good faith, the conclusions you've noted below are inaccurate. Just because meters are a part of a cohort that includes some meters that run fast or slow does not mean that all meters in that cohort are not functioning accurately. NW Natural removes and tests meters for many reasons, such as idle meters with no account and no usage, normal removals for customer requested meter changes or damages. Due to this, the number of meters removed and tested will exceed the numbers in the annual Meter Sample Program reports to the OPUC. Bill credits can be given for non-conforming meters or for many other reasons. Also note that removals that happen at the end of one year can result in bill credits or debits happening in a subsequent year.

NW Natural is required to ensure that meters installed in service are operating pursuant to OAR 860-023-0015, and ensures that via the Meter Sampling Program for diaphragm meters. The accuracy of the meter sampling program allows us to detect a failing meter family early, limiting over- or under-billing. Meter maintenance and replacement is a part of daily operations. Nothing associated with this work created issues that needed to be addressed in our general rate case. We want to ensure that meters in use are accurate and that our customers receive accurate billing. Not replacing these meters would be non-compliant with OAR 860-023-0015 and would result in inaccurate bills to our customers. While our warranty agreements are under NDA, any refunds or credits resulting from any warranty agreements are returned to customers through lower meter inventory costs.

Please see below for additional information and context.

Thank you,

Stefanie Week

NW Natural – Public Information Officer

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My pronouns: She, her, hers

Do customer accounts eligible for credits due to inaccurate meters have the credit amount calculated according to usage from the six months prior to the date their meter was removed? If not, how is the credit amount determined?

Bill credits are calculated according to usage from the six months prior to the meter being removed from service.

How long does it take to test a meter once it has been removed from the field?

A typical non-conforming meter will take between 30-80 days to test once it is removed from the field. For urgent requests, such as customer requested meter verification, NW Natural follows OPUC rules to ensure the test is made within 20 working days.

What proportion of removed and tested meters exceed the +/- 2% accuracy threshold?

In 2019: 21.9% of the **non-conforming meters** removed and tested were not accurate

In 2020: 19.7%

In 2021: 17.6%

What percentages of customer accounts associated with those meters have resulted in a total credit of <\$3 (residential) or <\$10 (commercial)?

In 2019: 94.4% of all **non-conforming meters** tested outside the accuracy threshold and resulted in a charge exceeding \$3

In 2020: 78.2%

In 2021: 101.5% (Note: >100% value because meters tested at 2020 year-end and credited in 2021.)

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What happens to meters that are removed and found to be functioning properly?

Once a meter is tested, the meter is recycled. Meters are never returned to service if they are part of a family that was declared non-conforming, regardless of how it tested.

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Does NW Natural conduct meter tests that are not included in its annual Meter Sample Program reports to the PUC?

To clarify: The 21,267 meter tests explained in the July 27, 2021 email to PUC staff was in reference, specifically, to three groups of meters that NW Natural is making or has made warranty claims on. These tests are a subset of all tests. The referenced tests in the RG 41 OPUC filing are strictly related to the Meter Sampling Program, meaning those are tests completed on in-service meter families over the course of the year. That number does **not** include meters removed from service as non-conforming meters. The total amount of meters **tested for non-conforming meters** was 10,503 in 2019, 26,187 in 2020 and 11,891 in 2021. NW Natural **tested a total** of 17,916 meters in 2019, 35,905 in 2020 and 28,508 in 2021, for any reason including the non-conforming meters.

To provide a concrete example for 2019: NW Natural tested a total of 17,916 meters, for any reason, during the year. Of those meters, 10,503 tests were non-conforming meters. Of those non-conforming meter tests, 2,193 tested fast (+2%) and 103 tested slow (-2%), for a total of 21.9% not accurate. Because our bill credits do not break down whether the meter was a non-conforming meter or any other type of meter, the number of credits/debits is compared to the total number of meters determined not accurate. Of the meters, 2,675 received a credit for fast meters, and 157 received bills for slow meters. The total amount credited was \$57,978.52 and the total amount billed for slow meters was \$21,206.76. The average residential credit per meter was \$11.41 and the average commercial credit per meter was \$52.44. The average residential bill for slow meters was \$25.85 and the average commercial bill for slow meters was \$264.02.

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