



Joelle R. Steward
Vice President, Regulation
1407 West North Temple, Suite 330
Salt Lake City, UT 84116

September 23, 2019

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Wyoming Public Service Commission
2515 Warren Avenue, Suite 300
Cheyenne, Wyoming 82002

Attn: Chris Petrie, Chief Counsel

Docket No. 20000-____-ET-19
Record No. _____

**RE: IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER
FOR AUTHORITY TO REVISE RULE 7 METERING**

Dear Mr. Petrie:

Enclosed for filing are an original and four (4) copies of Rocky Mountain Power's (the "Company") application requesting approval to modify Rule 7 (Metering).

In addition, the Company has also provided this application to the Wyoming Public Service Commission ("Commission") pursuant to its electronic filing requirements. The Company has enclosed a check in the amount of \$5.00 for the Commission's filing fee.

It is respectfully requested that all formal correspondence and Staff requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon 97232

with copies to: Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
Rocky Mountain Power
315 W. 27th St.
Cheyenne, Wyoming 82001
E-mail: stacy.splittstoesser@pacificorp.com

Wyoming Public Service Commission

September 23, 2019

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Daniel Solander
Senior Attorney
Rocky Mountain Power
1407 W. North Temple, Suite 320
Salt Lake City, Utah 84116
E-mail: daniel.solander@pacificorp.com

Please contact Stacy Splittstoesser, Wyoming Regulatory Affairs Manager at (307) 632-2677 if you have any questions.

Sincerely,



Joelle R. Steward
Vice President, Regulation

Enclosures

Daniel E. Solander
Senior Attorney
1407 West North Temple, Suite 320
Salt Lake City, UT 84116
Telephone: (801) 220-4014
Email: daniel.solander@pacificorp.com

Attorney for Rocky Mountain Power

BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF ROCKY MOUNTAIN POWER FOR)	DOCKET NO. 20000-____-ET-19
AUTHORITY TO REVISE RULE 7)	Record No. (_____)
METERING)	

COMES NOW, Rocky Mountain Power (the “Company”), and hereby applies to the Wyoming Public Service Commission (the “Commission”) for authority, pursuant to Chapter 3, Section 21(h) of the Commission’s Rules, to revise Section VI. of Rule 7 *Metering* to include a new option for customers to receive a non-metered service option for small usage devices as shown in Exhibit 1 to this Application.

In support of this Application, the Company states as follows:

1. Rocky Mountain Power is a division of PacifiCorp, an Oregon corporation, which provides electric service to retail customers through its Rocky Mountain Power division in the states of Wyoming, Utah, and Idaho, and through its Pacific Power division in the states of Oregon, California, and Washington.
2. Rocky Mountain Power is a regulated public utility in the state of Wyoming and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to retail customers in Wyoming. Rocky Mountain Power’s principal place of business in Wyoming is 2840 East Yellowstone Highway, Casper, Wyoming, 82602.

3. Communications regarding this filing should be addressed to:

Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
Rocky Mountain Power
315 West 27th Street
Cheyenne, WY 82001
E-mail: stacy.splittstoesser@pacificorp.com

Daniel E. Solander
Senior Attorney
Rocky Mountain Power
1407 West North Temple, Suite 320
Salt Lake City, UT 84116
E-mail: daniel.solander@pacificorp.com

In addition, the Company respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah St, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Stacy Splittstoesser, at (307) 632-2677.

4. The use of mobile information devices by the general public continues to expand (cell phones, tablets, etc.) and the communication industry is expanding its networks to provide sufficient capability to meet increased mobile communication demand. Their infrastructure needs require expansion of 4G networks and the addition of 5G networks, which require the installation of small cell antennas. These antennas provide significantly greater information data flow in areas of high density demand. The areas where the antennas are installed are typically within dense commercial areas with high foot and vehicle traffic, and they often have sidewalks separating buildings from streets.

Consequently, there is often little or no space for meter pedestals or other non-pole mounted equipment. In many cases, additional structures in the sidewalk or parking strip are not permitted, and many local jurisdictions do not allow installation of meters on poles for aesthetic reasons. On numerous occasions, the Company has heard from cell phone carriers that meter installation is a major impediment to their buildout of cell service networks.

5. In order to address this constraint on metering, the Company proposes to provide flat rate service to small cell antennas and other loads with less than two kilowatts (“kW”) per point of connection, if the Company deems metering to be impractical or unsafe.

6. The Company proposes that billing for these devices would be determined based on usage of the devices operating at 100 percent of capacity. The Company’s proposed tariff revisions specify that a customer participating in this option would be required to give the Company 30 days advance notice of known changes in its load. The tariff revisions would also provide the Company with the ability to test these devices on occasion and adjust for undercharges back to the date that service was first established if the customer under-reports its capacity requirements. These provisions protect other customers and ensure that the risks of accepting un-metered service in this limited situation are properly balanced.

7. Prior to filing this application, the Company met with different cell phone carriers to share its unmetered service option concept. Feedback from this group was very positive and the carriers strongly support the Company’s recommended changes.

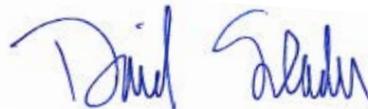
8. Providing unmetered service for small loads under two kW will benefit customers and have minimal impact to Company operations. Cell phone service providers and their corresponding customers will benefit from the unmetered option when local ordinances and space requirements do not allow for metered service.

9. The legislative and clean versions of the Company's proposed Rule 7 *Metering* tariff language, are included in Exhibit 1 to this application. The Company respectfully requests approval of the proposed changes with an effective date of January 1, 2020.

WHEREFORE, in accordance with Chapter 3, Section 21(h) of the Commission's Rules, the Company respectfully requests that the Commission issue an order allowing the option of unmetered service for small usage devices (two kW or less) to Section VI. of the Company's Rule 7 *Metering* tariff as shown in Exhibit 1 to this application.

DATED this 23rd day of September, 2019.

Respectfully submitted,



Daniel E. Solander
Attorney for PacifiCorp

Exhibit 1

ROCKY MOUNTAIN POWER

~~First-Second~~ Revision of Sheet No. R7-6
Canceling ~~Original-First Revision of~~ Sheet No. R7-6

P.S.C. Wyoming No. 16

Metering Rule 7

V. Demand Pulse Access (continued)

- E. The Company may interrupt the supply of pulse information to perform meter tests or other maintenance, after giving the Customer 24 hours' notice. The Company is not responsible for the effect on the Customer's operations or equipment.
- F. The Company may disconnect the Demand Pulse Relay equipment if the equipment should ever interfere with the Company's metering reliability or metering practices. The Company will give the Customer 24 hours' notice.

VI. Unmetered Service

A. Fixed Loads

When it benefits both the Customer and the Company, the Company may furnish unmetered service. The Company will furnish unmetered service only to fixed loads with fixed periods of operation, such as traffic lights. The Company will determine the average monthly use either by test or an estimate based on equipment ratings.

B. Small Usage Devices

Devices whose total connected load does not exceed 2,000 watts per point of connection may be provided unmetered service if, at the sole discretion of the Company, usage is impractical or unsafe to meter. The monthly kWh billed each month for such small usage devices shall be determined as the total kW capacity requirement of the Customer's equipment multiplied by 730 hours. The capacity requirement shall be stated on the Customer's application for service. Connection to Company's system will be made by Company, subject to Customer's installation meeting all of Company's design and installation requirements.

The Customer shall not change the capacity requirement or other aspects of their installation without first notifying the Company in writing a minimum of 30 days before changes are made. Customer's changes that render the service

Issued by

~~Jeffrey K. Larsen~~ Joelle R. Steward, Vice President, Regulation

Issued: ~~October 27, 2017~~ September 23, 2019

Effective: With service rendered
on and after ~~September 12, 2017~~ January 1, 2020

ROCKY MOUNTAIN POWER

~~First-Second~~ Revision of Sheet No. R7-6
Canceling ~~Original-First Revision of~~ Sheet No. R7-6

P.S.C. Wyoming No. 16

Metering Rule 7

ineligible for unmetered service shall result in service being metered. Under such circumstances, Company approved metering point(s) must be installed by Customer within 30 days following notification or service will be disconnected.

The Company shall not be required to adjust billings due to failure of Customer's equipment. The Company shall have the right to test the capacity requirements of small usage devices from time to time. If the Company determines that the capacity was under-reported by the Customer or that the Customer otherwise failed to notify the Company of an increase in capacity, the Company may backbill for the incremental kWh associated with such increased capacity back to the date that service was first furnished.

Issued by

~~Jeffrey K. Larsen~~Joelle R. Steward, Vice President, Regulation

Issued: ~~October 27, 2017~~September 23, 2019

Effective: With service rendered
on and after ~~September 12, 2017~~January 1, 2020

WY_R7-6.E

Dkt. No. 20000-~~503~~ -ET-~~165~~19

ROCKY MOUNTAIN POWER

Second Revision of Sheet No. R7-6
Canceling First Revision of Sheet No. R7-6

P.S.C. Wyoming No. 16

Metering Rule 7

V. Demand Pulse Access (continued)

- E. The Company may interrupt the supply of pulse information to perform meter tests or other maintenance, after giving the Customer 24 hours' notice. The Company is not responsible for the effect on the Customer's operations or equipment.
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The Customer shall not change the capacity requirement or other aspects of their installation without first notifying the Company in writing a minimum of 30 days before changes are made. Customer's changes that render the service ineligible for unmetered service shall result in service being metered. Under

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ROCKY MOUNTAIN POWER

Second Revision of Sheet No. R7-6
Canceling First Revision of Sheet No. R7-6

P.S.C. Wyoming No. 16

Metering Rule 7

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