

APS Comments to CUC Comments on the State Metering Handbook

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| 1. | <p>CUC Comment: The document is incomplete. There are numerous placeholders for sections that do not exist. A number of these missing sections may impact completed sections, in ways that have not been thoroughly discussed, or even fully contemplated, by the group at this point.</p> <p>APS Comment: As discussed in the Overview of the Handbook, the “placeholders” throughout the document represent topics that have yet to be addressed by the PSWG. As the group addresses the topics all other sections will be reviewed in an effort to identify sections that may be impacted.</p> |
| 2. | <p>CUC Comment: 1.4 Calls for compliance with a pot pouri of rules, standards, guidelines, codes, and requirements without delineating an order of precedence or providing language that addresses the likelihood of contradictory information.</p> <p>APS Comment: APS agrees additional language may be needed.</p> |
| 3. | <p>CUC Comment: Various references to UDC “certification” requirements for MSPs/MRSPs, over and above ACC certification requirements. 2.2 still implies UDC certification.</p> <p>APS Comment: APS requires any ACC certificated MSP or MRSP to complete additional requirements to be certified to operate in the APS service territory.</p> |
| 4. | <p>CUC Comment: kW Display requirement in 3.3 that exceeds the previously agreed to minimum of kWh consumption display, will eliminate from consideration, or substantially raise the price of, a number of AMR technologies who may otherwise participate in residential Direct Access metering. Additionally, if kW is critical to display, why isn’t On-and-Off Peak TOU quantities, that are necessary for billing certain residential rates. This requirement may be viewed as unnecessarily prescriptive.</p> <p>APS Comment: The language in this section states, “In addition, a kW display may be required if it is needed for the billing of distribution charges.” The handbook is not saying it is required.</p> <p>APS would agree to amend the language to say, “In addition, other displays (i.e. kW, TOU) may be required.” This would provide for any type of required display to support the UDC distribution tariff.</p> |
| 5. | <p>CUC Comment: Insufficient definitions throughout, examples:</p> |
| A | <p>CUC Comment: Is section 3.4 Performance Metering Specifications and Standards intended to meet the requirements of 1612 L.15?</p> <p>APS Comment: Yes, it is intended to meet requirements of 1612 L. 15. PSWG needs to confirm if this section in the Handbook will take the place of the approved Operating Procedure.</p> |
| B | <p>CUC Comment: Relationship between Sections 1.4 and 3.4. At a minimum the references to electrical codes is redundant.</p> <p>APS Comment: APS Agrees electric code reference is redundant, however, APS supports the reference in both sections.</p> |
| C | <p>CUC Comment: Section 3.7 CT should have a parallel definition to VT that indicates a CT provides a current to metering devices proportional to the load current in the primary.</p> <p>APS Comment: APS will support adding language after the first sentence in 3.7 .</p> |

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| 6. | <p>CUC Comment: 3.5 Is overly simplistic and fails to address the issue of customers with insufficient historical data to make a 20kW determination.</p> <p>APS Comment: APS will support adding the predictable load language from R14-2-1612 L 6 to this section.</p> |
| 7. | <p>CUC Comment: Parts of 3.6 External Devices and the as yet unwritten 3.11.4 Metering Communications/External Devices, will undoubtedly have redundant information as some communicating external devices are already described in 3.6</p> <p>APS Comment: PSWG will handle any inappropriate redundancy issues when these topics are addressed.</p> |
| 8. | <p>CUC Comment: 5.3 Service Delivery Point Identifiers conflicts with Rules 1612 L. 3., which only requires UNIs for competitive points of delivery.</p> <p>APS Comment: APS recommends adding “competitive” in two different sentences to read as follows:</p> <p style="padding-left: 40px;"><i>The service delivery point identifier used in Arizona is the Universal Node Identifier (UNI). The UNI is a unique permanent identification number assigned by the UDC to each competitive service delivery point on the UDC distribution system. A UNI will be assigned to both metered and un-metered competitive service delivery points. The UNI will be used as a requirement in transactions between the UDC, the ESP and their agents.</i></p> |
| 9. | <p>CUC Comment: 5.3 Language may imply that UNI MUST be physically identified in the field, especially given the remarks in the introductory paragraph regarding requirements of field personnel. I would suggest language that clarifies that UNIs are there for efficiently tracking data transactions and this does not imply a physical labeling requirement. Of course, that may be made explicitly clear some day in Chapter 6, but that remains to be seen.</p> <p>APS Comment: APS will support adding language to clarify UNIs are not required to be visible in the field. Recommended language:</p> <p style="padding-left: 40px;"><i>UDCs are not required to physically mark/identify service delivery points in the field.</i></p> |
| 10. | <p>CUC Comment: 9.2 Why do we have the selective caveat here and in a couple other places “...subject to change based on future work”? Doesn’t this imply other paragraphs/sections without this statement are NOT subject to future changes?</p> <p>APS Comment: APS supports deleting this sentence in 9.2, 10.2, 10.3, 11.4.1, 12.2.1 &12.2.1.2.</p> |
| 11. | <p>CUC Comment: 9.2 (2) In certain cases Citizens will be unable to send pending DASRs. Waiver being discussed.</p> <p>APS Comment: No comment</p> |
| 12. | <p>CUC Comment: 10.3 Same caveat as in 9.2</p> <p>APS Comment: See #10</p> |
| 13. | <p>CUC Comment: 10.3 Inconsistent numbering format with other sections of this document.</p> <p>APS Comment: APS will support numbering changes.</p> |

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| 14. | CUC Comment: 10.3Purchase of Existing Equipment |
| A | <ul style="list-style-type: none"> • CUC Comment: Paragraph 4 has the ESPs opting not to purchase equipment from themselves. Should likely read “UDC”. <p>APS Comment: APS agrees that this was missed and <u>must</u> be corrected. As currently written, it is incorrect.</p> |
| B | <ul style="list-style-type: none"> • CUC Comment: Paragraph 3 should say “indicates”, rather than “indicated”. <p>APS Comment: APS supports changing “indicated” to “ indicates” in section 10.2, #4.</p> |
| C | <ul style="list-style-type: none"> • CUC Comment: If you read this section, (and its parallel in section 10.2), the ESP must change its “Y” to “N” on the EPA form under “Intent to Purchase” and “return the form to the seller”. Problematically, the “seller” currently is in possession of said form. Are we suggesting a SECOND EPA be sent? Are we implying an Update/Change EPA (heaven forbid). <p>APS Comment: PSWG may need to add clarification to this section as to the intent/meaning. There is no Update/Change EPA...what the seller is looking for is a signed EPA. It is the responsibility of the seller to confirm the senders final decision (“Y” or “N”) on purchasing the equipment when the signed EPA is received.</p> |
| 15. | <p>CUC Comment: 11.3.1 Emergency Site Access – As utilities know, a large majority of physical meter access issues involve actions taken by customers. It is impractical and unfair to expect ESPs to meet the stated requirements of this paragraph.</p> <p>APS Comment: APS supports adding clarifying language. This section was not intended to imply the MSP is responsible for <u>all</u> meter access issues. The intent was to place the responsibility on the MSP when the MSP changes the access by installing new devices, new locks, etc.</p> |
| 16. | <p>CUC Comment: 11.4.1 Vague, regarding responsibilities for sending and receiving MDCRs given multiple possible scenarios.</p> <p>APS Comment: Need additional information from CUC on this issue.</p> |
| 17. | <p>CUC Comment: 12.2.1 General Instructions (2) – Are we sure we want to say “for each meter located at the site”? Do we mean “premise” or do we actually mean “site”?</p> <p>APS Comment: This may be a semantics issue. APS views the site and premise as one in the same. PSWG needs to discuss to see if this should be clarified.</p> |
| 18. | <p>CUC Comment: 12.2.1.1 and 12.2.1.2 General Instructions - “Two versions of MIRN” language is fairly indecipherable.</p> <p>APS Comment: APS agrees they are fairly indecipherable, however, there is a need for two versions given they support two different scenarios. PSWG needs to identify if language could be added to clarify.</p> |
| 19. | <p>Policy Group Comment (New item 9/12/01) Address the document to make sure that MRSP references are appropriate. Identify (by page number/line number) where MRSP may NOT be appropriate.</p> |