



2302 Great Northern Drive  
Fargo, North Dakota 58402

August 4, 2022

—VIA ELECTRONIC FILING AND U.S. MAIL—

Steven M. Kahl, Executive Director  
North Dakota Public Service Commission, Dept. 408  
State Capitol, 600 E. Boulevard  
Bismarck, ND 58504-0480

RE: INFORMAL HEARING FOLLOW UP INFORMATION  
ADVANCED METERING INFRASTRUCTURE TARIFF AND RATES  
CASE NO. PU-22-180

Dear Mr. Kahl:

Northern States Power Company, doing business as Xcel Energy, submits to the North Dakota Public Service Commission (Commission) this Letter containing the follow-up items from the July 6, 2022 Informal Hearing for the above-mentioned case.

During the July 6, 2022 Informal Hearing, we noted we would provide additional information on the following items related to the proposed Manual Meter Reading tariff: further details on the non-standard meter and its memory capacity; the feasibility of reading meters less frequently than monthly for customers who opt out; and the feasibility of including the \$40 “non-standard meter removal charge” up front. We appreciate the opportunity to address these items below.

**A. Non-Standard Meter Specifications and Frequency of Manual Reads**

In our May 2, 2022 Petition, we proposed a fixed charge of \$15 per month to cover the costs associated with monthly manual meter reading. Here we provide some additional background on the non-standard meter that opt-out customers will receive, and discuss monthly meter reading further. Ultimately, we reaffirm our conclusion that reading meters each month is the best option for our customers and the Company.

During the Informal Hearing, we discussed the storage capacity and capabilities of the non-standard meters that customers would receive if they opt out. We would like to add and clarify that the meter has the capability of maintaining 105 days of 15-minute interval usage, for a total of 10,080 data points. After 105 days, usage data from day one would be irretrievably replaced by usage data from day 106, and so on.

Although the meters can store 105 days' worth of data, reading meters less frequently than monthly would not lead to cost savings because the Company would need the same number of meter readers. We have three meter readers in North Dakota – one each in Minot, Grand Forks, and Fargo. Billing cycle dates vary by customer, so meters are read throughout the month. Regardless of meter reading frequency, at least one meter reader per city is needed to conduct meter readings safely and efficiently.

Further, the change to interval billing creates additional complexities on top of the already manual nature of truing up estimated bills. As discussed during the Informal Hearing, we would need to estimate bills based on expected usage for months when we do not obtain a meter reading. After the third month, when we would obtain a meter reading, a manual review of the estimated bills from the two previous months would be required to ensure accurate billing; our Meter Data Management system cannot systematically true up the estimated bills to actual usage. This manual review for all opt-out customers would create an untenable administrative burden on the Company.

Finally, we note that customer confusion and frustration often result from estimated bills, driving call volume. In 2021, Xcel Energy handled over 100,000 phone calls from customers who had recently been issued an estimated bill.

For these reasons, we continue to propose a \$15 per month fixed charge for monthly manual meter reading.

## **B. Upfront Charges**

In our May 2, 2022 Petition, we had proposed that a customer opting out of an AMI smart meter would incur a \$40 *non-standard meter removal charge* when (1) they later elect to have an AMI smart meter installed, or (2) they vacate the premise. During the Informal Hearing, Commissioners expressed a preference to include the \$40 charge upfront when a customer first opts out.

We appreciate the Commission's feedback and will apply the *non-standard meter removal charge* upfront, on the first bill after a customer opts out and elects the MMR Rider. We have attached a revised tariff sheet as Attachment A.

As discussed during the Informal Hearing, we note that in this case, if a customer opts out after the AMI meter has already been installed, they will pay a total of \$80 on the first bill after they opt out: \$40 to install the non-standard meter, plus \$40 to install the AMI meter in the future after they vacate the premise or elect an AMI meter. In this case, the customer would see one line item on their bill for \$80, corresponding to the *non-standard meter installation and removal charge*. Customers who opt out prior to AMI meter installation would pay the \$40 *non-standard meter removal charge*. In either case, the customer would also pay the \$15 monthly fixed charge for manual meter reading.

Therefore, we propose to revise the bill message from Section X of our Petition:

**Original as proposed:**

*You have elected on-site manual meter reading service and a non-standard, non-communicating meter. Your bill now includes the monthly Manual Meter Reading Rider charge.*

**For bills including the \$80 *non-standard meter installation and removal charge*:**

*You have elected on-site manual meter reading service and a non-standard, non-communicating meter. Your smart meter has been replaced. Your bill includes a one-time charge for installation of the non-communicating meter and future installation of a standard smart meter at the premises. Your bill also now includes a monthly charge for manual meter reading.*

**For bills including the \$40 *non-standard meter removal charge*:**

*You have elected on-site manual meter reading service and a non-standard, non-communicating meter. Your bill includes a one-time charge for future installation of a standard smart meter at the premises. Your bill also now includes a monthly charge for manual meter reading.*

Please feel free to contact me at (612) 330-7974 if the Commission requires additional information or has any questions.

Sincerely,

/s/

CHRISTOPHER SHAW  
MANAGER, REGULATORY POLICY

# Legislative

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Date Filed:	<del>03-26-24</del> <sup>08-04-22</sup>	By: Christopher B. Clark	Effective Date:	<del>10-01-24</del>
		President, Northern States Power Company, a Minnesota corporation		
Case No.	PU- <del>20-441</del> <sup>22-180</sup>		Order Date:	<del>08-18-24</del>

**NORTH DAKOTA ELECTRIC RATE BOOK – NDPSC NO. 2**

**RATE SCHEDULES**

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**MANUAL METER READING RIDER**

Section No. 5  
Original Sheet No. 92

**AVAILABILITY**

Available as an option to Residential Service, Residential Time of Day, Small General Service, and Small General Time of Day Service customers who elect on-site manual meter reading service and a non-standard, non-communicating meter instead of having their energy usage measured with standard Advanced Metering Infrastructure (AMI) with two-way communication capabilities (smart meter).

**RATE**

Fixed Charge per Month	\$15.00
Non-Standard Meter Installation and Removal Charge	\$40.00
Non-Standard Meter Removal Charge	\$40.00

**TERMS AND CONDITIONS OF SERVICE**

1. Customers who elect to receive this service after the installation of a standard AMI smart meter at their premise(s) will be subject to the Non-Standard Meter Installation and Removal Charge upon request for this service. This charge covers the cost to install the non-standard meter as requested, as well as the future cost to remove the non-standard meter when the customer cancels this service or vacates the premise where service was requested. ~~However, a one-time waiver of the Non-Standard Meter Installation Charge will apply to customers who elect this service prior to the installation of a standard AMI smart meter at their premise(s).~~
2. Customers who elect to receive this service prior to the installation of a standard AMI smart meter at their premise(s) will be subject to the Non-Standard Meter Removal Charge upon request for this service. This charge covers the future cost to remove the non-standard meter when the customer cancels this service or vacates the premise where service was requested.  
~~Customers who cancel this service or vacate the premise where the service was requested will be subject to the Non-Standard Meter Removal Charge.~~
3. This rider will separately apply to each individual non-standard meter.
4. The Company reserves the right to refuse availability of this rider if the:
  - a. Manual meter reading service would create a safety hazard for the customer, the public, or the Company's personnel or facilities,
  - b. Customer does not allow the Company's employees or agents access to the non-standard meter(s) at the customer's premise(s), or
  - c. Customer has a history of meter tampering.
5. Entities such as multi-unit dwelling associations are not authorized to elect this rider on behalf of individually metered customers.
6. Customers electing manual meter reading service may receive bills based on estimated meter readings in any month where circumstances prevent a meter reading.

## **Non-Legislative**

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Minneapolis, Minnesota 55401

**NORTH DAKOTA ELECTRIC RATE BOOK – NDPSC NO. 2**

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**MANUAL METER READING RIDER**

Section No. 5  
Original Sheet No. 92

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**RATE**

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