

Addendum to Section 31 of report submitted on August 8, 2016

31.4.4.1

No Cost Opt Out Request:

The current ruling by the PUCT is that TDSPs may assess an initial meter replacement fee and a monthly meter reading fee for customers requesting the replacement of an advanced meter with a non-standard, non-communicating, electromechanical analog meter. Below are the PUCT Electric Substantive Rules - Chapter §25.123 Meter Readings providing for a customer-read program. A no cost opt out can be achieved by reestablishing the §25.123 language in its original October 26, 2006 wording. Current language is below, including changes to the Meter Reading section, Chapter 25, approved May 30, 2007.

<https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/25.130/25.130ei.aspx>

**§25.123. Meter Readings**

**§25.123. Meter Readings – Language prior to May 30, 2007 amendment**

**(c) Customer-read program.** If electric utility has a customer-read program in which customers read their own meters and report their usage monthly readings shall be considered an actual meter reading by the electric utility for billing purposes. However, an electric utility shall read the meters of customers on a customer-read program at least every 12 months to verify the accuracy of the electric utility's records.

**Current language for §25.123. Meter Readings (c) approved on May 30, 2007 from October 26, 2006 proposed amendment.**

**(c) Customer-read program.** For meters other than advanced meters, an electric utility in an area where retail competition has not been introduced, may use ~~If electric utility has~~ a customer-read program in which customers read their own meters and report their usage monthly. ~~Such, such~~ readings shall be considered an actual meter reading by the electric utility for billing purposes. However, an electric utility shall read the meters of customers on a customer-read program at least every ~~six~~<sup>12</sup> months to verify the accuracy of the electric utility's records.

The cost of conducting an annual meter read shall be incurred by the utility customer, not only through the nonbypassable surcharge resulting from advanced meter deployment, but also through the cost of the advanced meter the customer is not using.

The cost of initial meter replacement shall be a one-time fee of \$75. (reduced fee for low income)

Meter reading reporting options:

1. Call in number that links customer phone number with customer utility account. Customer enters meter read data followed by the # sign. Customer then receives a confirmation number. XML data interchange updates meter read data field in billing software.

#### **31.4.4.2**

##### **Notice to Customer of Mesh Network Transmissions**

PUCT shall establish rules giving notice to customers of the number of transmissions per day emitting from advanced meters necessary for mesh network communications. (For example, 9,600 - 190,000 transmissions per 24hrs). Notice should include the number of transmissions emitting from the mesh network communications, peak radio frequency intensity [such as milli watts per meter squared (  $mW/m^2$  )] and weighted average duty cycle [time of exposure].

#### **31.4.4.3**

##### **Notice to customer if resident advanced meter is used as a collector meter.**

PUCT shall establish rules requiring notice to customers on their utility bill if a customer meter is used as a collector meter to include date and time when data was accumulated on customer's advanced meter. Collector metering may be necessary for the utility to transmit usage from residences outside of antennae range to the utility collector site.

#### **31.4.4.4**

##### **Require Opt-In for the Home Area Network (HAN).**

PUCT shall set rules to require the TDSP to set the default setting on the HAN Zigbee chip to OFF, until the customer opts in for service. Notice should include the range of transmissions emitting from the Zigbee chip, peak radio frequency intensity [such as milli watts per meter squared (  $mW/m^2$  )] and weighted average duty cycle [time of exposure]. Rules should provide for penalties for TDSPs if HAN is found to be ON when a customer requested it to be OFF.

#### **31.4.4.3**

##### **Time of Use 15 minute interval usage data shall be Opt-In.**

PUCT shall set rules to require the TDSP to set the default setting for meter data read to once daily and for data transmission takes place during business hours. Notice should include the range of transmissions emitting from the data read transmissions, peak radio frequency intensity [such as milli watts per meter squared (  $mW/m^2$  )] and weighted average duty cycle [time of exposure]. Customer shall have the right to opt-in for granular data acquisition, based on hourly or 15 minute incremental billing.

#### **31.4.4.4**

##### **Phase Out of Advanced Metering Systems**

PUCT to commission independent study with citizen board oversight to determine viability of Advanced Metering Systems (AMS) considering service life of metering devices, software upgrade requirements, communication limitation, and ongoing threats from hacking due to wireless communications. Consider liability insurance coverage for radio frequency exposure from TDSPs due to recent and ongoing research demonstrating potential harm to humans and environment from wireless exposure. Consider a phase out of Smart Meters aka Advanced Meter Infrastructure to be replaced with non-transmitting, electromechanical analog meter when AMS software upgrades are required or the advanced meters require replacement due to equipment failure, communication failure or model upgrade requirements.