

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review	)	
of Chapter 4901:1-10, Ohio Administrative	)	Case No. 12-2050-EL-COI
Code, Regarding Electric Companies	)	

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**COMMENTS OF INTERSTATE GAS SUPPLY, INC**

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In an Entry filed on July 10, 2013 in the above captioned proceeding, the Commission requested comments on a proposed rule that would allow customers to opt-out of advanced meter installation on their premises. The proposed rule also allows customers to request that a utility remove an advanced meter installed on their premises and instead have a conventional meter installed.

Interstate Gas Supply, Inc. ("IGS Energy") is generally supportive of advanced meter deployment. Advance meters offer many benefits to customers, including; 1) more accurate usage data which allows customers to better tailor their consumption based on discrete price signals, 2) enabling CRES suppliers to offer more diverse range of products to customers including time of use rates, 3) faster recognition of electric outages, and reconnection of electric service and 4) faster and more accurate meter reading. As such, the Commission should adopt policies that encourage full advanced meter deployment across all electric utility service territories.

Advanced meters also reduce cost of serving customers over the long run by reducing visits to the home for services such as meter reading, connection and disconnection. Also, in a competitive market, advanced meters enable utilities to switch

customers from one service to another faster and more efficiently, further reducing costs.

As fewer customers receive traditional metered service, the per customer cost of maintaining traditional meter service becomes even greater. For instance, as fewer customers require a traditional meter read, the greater the cost per customer to maintain meter reading personnel that perform this service. Further, as fewer customers have traditional meters, per customer costs increases to maintain duplicative IT and infrastructure to track usage and payment from traditional metered service.

To the extent the Commission finds it necessary to allow customers to opt-out of advance meter deployment, customers that chose to opt-out of advance meter technology should pay *the full cost* of opting-out. This includes not only the cost of installing traditional meters, but also the full cost to the utility to support traditional meter service. In the proposed advance meter rules the Commission has included a provision that requires customers to pay the cost of opting-out of advanced meter deployment. For the reasons discussed herein, IGS Energy is supportive of this provision.

Respectfully submitted,

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Summary: Comments electronically filed by Mr. Matthew White on behalf of IGS Energy