

**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Commission's</b>	)	
<b>Review of Chapter 4901:1-10, Ohio</b>	)	<b>Case 12-2050-EL-ORD</b>
<b>Administrative Code, Regarding</b>	)	
<b>Electric Companies</b>	)	

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**REPLY COMMENTS OF  
OHIO POWER COMPANY**

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**Introduction:**

Ohio Power Company (AEP Ohio or the Company) submits these reply comments for Commission consideration. By entry dated July 10, 2013, the Commission sought comments from interested parties to review the newly proposed rules related to customer meter opt out capability shown in OAC 4901:1-10, Electric Service Standards. Initial comments were filed August 6, 2013 and file reply comments are to be filed by August 16, 2013. AEP Ohio respectfully submits the following reply comments. To the extent Ohio Power does not discuss a point raised by another party should not be construed as agreement with that point.

**Comments:**

**COSTS ASSOCIATED FOR SPARATIC MANUAL METER READS IS NOT  
CURRENTLY RECOVERED IN RATES 4901:1-10-05(J):**

OPAE's initial comments state that the cost to read a customer's meter is currently reflected in a customer's rates. While utilities seek to read meters efficiently and through lowest cost methods, either manually or through advanced meters, the cost

associated with a meter opt out in an area with advanced meters increases cost significantly to the utilities, and that additional cost is something which is not currently recovered through current rates. The additional cost associated with an individual customer's choice against that of what the utility has the right to install does add additional cost to utilities through such things as stocking of extra types of meters, stocking and maintenance of manual meter read hand held equipment, and the additional labor and time to perform a manual meter read.

There are other costs not included in current rates that should be recognized. For example, not included in rates is a system to track customers who refuse the meter which the utility provides and then implement a trigger to manually read a meter which is located in an automated meter reading territory. These types of systems do not currently exist today and are not being recovered in current rates by customers. In addition, AEP Ohio firmly believes that not all customers should have to incur the costs associated with an individual customer decision to not use the company meter provided.

**CUSTOMER'S SHOULD NOT HAVE A CHOICE ON HOW OFTEN AN  
ACTUAL READ OCCURS 4901:1-10-05(I)(4)(d):**

OCC argues that a customer should have the right to choose an actual meter read once a month or quarterly to lower costs for the customer. This option would actually raise the opt-out cost for a customer since AEP Ohio would have to build additional functionality to allow a customer a choice, flag their choice in the system as such, and dispatch a meter reader only based on an additional customer choice. The cost to add this additional automated functionality would be borne only by customers who opt out, and would raise customers opt out cost significantly. Therefore, AEP Ohio recommends that

the utilities have the right to state the actual meter reading frequency for customers who opt out and that should be addressed in the utilities tariff when filed.

**THE DEFINITION OF AN ADVANCED METER NEEDS ADDITIONAL CLARIFICATION 4901:1-10-01(A):**

DP&L, OCC, and AEP Ohio all take a different view on the proposed definition of an advanced meter. Both the OCC and DP&L are assuming that an advanced meter is only Smart Meters while AEP Ohio treats AMR meters in the definition of an advanced meter. Because this confusion exists, it is important that the Commission add additional language around what an advanced meter is by definition. In initial comments, AEP Ohio recommends that a separate definition be added for a Smart Meter, while an advanced meter definition captures both that of a Smart Meter and an AMR meter.

**CUSTOMERS WITH TAMPERING HISTORY SHOULD NOT BE ABLE TO OPT OUT OF ADVANCED METERING 4901:1-10-05 (J)(3):**

DP&L suggests that additional rule language be added stating customers should not be allowed to opt out if they have a history of tampering or there is evidence of tampering with meters. AEP Ohio supports this additional rule change suggestion.

**ADVANCED METER DATA POLICY AND SHARING OF SMART METER INFORMATION HAS BEEN ADDRESSED IN CASE 11-277-GE-UNC:**

AEP Ohio agrees in some respect with Direct Energy's comments with regards to CRES providers needing access to interval data to help support development of time differentiated pricing. However, AEP Ohio believes that there are numerous technical and policy issues associated with the specific recommendations, and believes that this docket does not allow all parties sufficient opportunity to comment to the depth needed. The Commission already opened docket Case No 11-277-GE-UNC to investigate the myriad of issues associated with customer data access and consumer privacy of smart

meter data. Numerous parties filed both original and reply comments debating the substantive issues that were raised. The resulting Order from that proceeding directed the Staff to develop a proposal for Commission action, and file that proposal in a new docket. Also, it was suggested by many parties that the Staff hold stakeholder meetings and /or workshops to further investigate the issues identified. AEP Ohio suggests that this is the more appropriate path to pursue to resolve the many issues that are inherent to the topic; AEP Ohio believes that adopting Direct Energy's proposed changes in isolation and without considering the many technical and policy issues associated with these topics would not be prudent.

Direct Energy proposes a rule that electric utilities disclose 'de-identified energy usage data', but offers no details on the specifics of their suggestion. What specific methods should be used to 'de-identify' the data? Are these methods sufficient to avoid re-identification? What information is proposed to be included in 'energy usage data'?

In addition, Direct Energy proposes a rule that electric utilities disclose customer interval data to CRES providers in certain circumstances. While AEP Ohio understands that such data is needed to bill a customer on a time of use tariff, there are other considerations with the disclosure of such data. For example, are there any restrictions on CRES providers with respect to the subsequent use, retention, further disclosure, or sale of such data beyond the stated purpose? Many parties to the previous docket on this subject had specific concerns and thoughts with respect to these issues, and would likely want to have their perspectives considered before such a newly proposed rule by Direct Energy was adopted.

Direct Energy also proposes a rule that requires that such interval energy usage data be provided to the CRES provider via an EDI file, web portal, etc. “in real-time”. This recommendation indicates a fundamental misunderstanding of the technical operation of Advanced Metering Infrastructure. While AMI meters are capable of recording interval usage data in 15-minute increments, that data is only collected by the utility typically twice per day. Therefore, the recommendation is not feasible.

### **Conclusion**

For the foregoing reasons, AEP Ohio respectfully requests that the Commission consider the above comments.

Respectfully submitted,

//ss//Matthew J. Satterwhite

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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing AEP Ohio Reply Comments was served upon the parties of record by electronic service this 16<sup>th</sup> day of August 2013.

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Summary: Reply Comments electronically filed by Mr. Matthew J Satterwhite on behalf of Ohio Power Company