

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

IN RE: ALLAMAKEE-CLAYTON ELECTRIC COOPERATIVE, INC.	DOCKET NO. TF-07-180
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ORDER REJECTING TARIFF

(Issued November 9, 2007)

On October 15, 2007, Allamakee-Clayton Electric Cooperative, Inc. (Allamakee-Clayton), a non-rate-regulated public utility, filed with the Utilities Board (Board) a proposed tariff revision to section 13 (Meter Testing) of its tariff. Allamakee-Clayton deleted the requirement of testing meters that are being retired from service. Allamakee-Clayton stated that this is being proposed in accordance with 199 IAC 20.6(3)"a," which references accepted good practice as provided in American National Standard Code for Electricity Metering (ANSI) publication C12.1-2001. ANSI C12.1-2001, section 5.1.3.3 provides that "[m]eters removed from service may be retired without test."

Subrule 199 IAC 20.6(2)"c" requires that a meter-testing program must include:

Testing of in-service meters, including any associated instruments or corrective devices, for accuracy, adjustments or repairs. This may be accomplished by periodic tests at specified intervals or on the basis of a statistical sampling plan, but shall include meters removed from service for any reason.

While Allamakee-Clayton is a non-rate-regulated rural electric cooperative, it is subject to the Board's meter inspection and testing rules. 199 IAC 20.1(3).

The Board has adopted ANSI Code C12.1-2001 as acceptable good practice for meters and meter testing. However, 199 IAC 20.6(2)"c" goes beyond the requirements of the referenced ANSI Code and specifically requires utilities to include a testing plan for meters removed from service for any reason, which includes meters removed from service for retirement. By not performing as-found tests on meters as they are removed from service, it would be almost impossible to investigate any customer complaints or inquiries regarding removed meters. Therefore, the proposed tariff will be rejected.

However, the ANSI Code allows for statistical sample testing of in-service electric meters to comply with periodic test requirements. If Allamakee-Clayton is planning to remove a large number of meters in a short period of time and it would be cost prohibitive to test every meter upon removal, it might be appropriate for Allamakee-Clayton to implement a statistical sample testing plan (based on ANSI Code C12.1-2001 Section 5.1.4.3.3) for meters being retired. This would require Allamakee-Clayton to divide the removed meters in homogenous groups and sample test them. Allamakee-Clayton may request a waiver of the Board's rules that would allow it to sample test electric meters when large numbers of meters are removed from service in a short period of time. See, MidAmerican Energy Company, "Order Granting Request for Waiver," Docket No. WRU-07-25-156 (10/29/2007).

IT IS THEREFORE ORDERED:

Tariff filing TF-07-180 is rejected.

UTILITIES BOARD

/s/ John R. Norris

/s/ Krista K. Tanner

ATTEST:

/s/ Judi K. Cooper
Executive Secretary

Dated at Des Moines, Iowa, this 9th day of November, 2007.