

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
UTILITIES BOARD

IN RE:  MIDAMERICAN ENERGY COMPANY	DOCKET NO. WRU-08-31-156
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**ORDER GRANTING WAIVER**

(Issued August 29, 2008)

On August 5, 2008, MidAmerican Energy Company (MidAmerican) filed a request with the Utilities Board (Board) for waiver of Board rules that would allow MidAmerican to remove flood and tornado damaged gas meters without testing them. MidAmerican has a written program for inspection and testing of gas meters as required by 199 IAC 19.6(1). The meter testing program includes a requirement pursuant to paragraph 19.6(2)"c" that provides for the testing of all in-service meters removed from service for any reason, which includes testing of damaged meters. MidAmerican states that many of its gas meters were damaged by the recent severe weather. MidAmerican requests a waiver of paragraph 19.6(2)"c" to forego the testing of gas meters contaminated by the flooding or damaged by tornados. This request has been identified as Docket No. WRU-08-31-156.

MidAmerican states that approximately 200 gas meters were removed from Parkersburg, Iowa, homes and businesses after the tornado and approximately 65 of these gas meters were damaged and cannot be tested. Also, several thousand gas meters were submerged during the flood. Overall, MidAmerican estimates 6,185 gas

meters have been affected by the flood and tornados. These meters are located in New Hartford, Nashua, Shell Rock, Plainfield, Charles City, Clarksville, Waverly, Janesville, Independence, Waterloo, Washburn, Evansdale, Elk Run Heights, Cedar Rapids, Iowa City, Coralville, Atalissa, Des Moines, Ottumwa, Quad Cities, Fort Madison, and Parkersburg, Iowa.

MidAmerican states that testing of these meters would be of little value due to internal damage to the meters. Additionally, testing equipment could be damaged if there is water in the meter when the meter is tested. MidAmerican states there are also health concerns for persons doing the transporting, handling, and repair of the meters because of mold, chemicals, and organic waste in the floodwaters.

MidAmerican proposes to scrap the contaminated and damaged meters in the listed cities. MidAmerican will attempt to read each meter and, if the meter can be read and the reading is consistent with historical usage, the reading will be recorded as the official reading from which a bill will be prepared. If the meter cannot be read, MidAmerican will use the last meter reading that was billed prior to the flood or tornado as the final meter reading. If a customer disagrees with the reading, MidAmerican states that it will work with the customer to resolve the issues on a case-by-case basis.

Paragraph 199 IAC 19.6(2)"c" requires the utilities to have a written meter testing plan that includes a procedure for testing meters that are removed from service for any reason. Generally, when meters are removed from service, an as-found test is conducted on the meters. If the meter is scheduled to be used again,

the meter error is adjusted as close to zero as possible and the meter is tested again (the as-left test) before putting the meter back into service.

Rule 199 IAC 1.3 establishes the criteria for granting of waiver requests. The Board finds that MidAmerican's waiver request meets the four criteria in 199 IAC 1.3 and the Board will grant a waiver of the meter testing requirements in 199 IAC 19.6(2)"c" for meters damaged by flooding and tornados in the cities listed above. It would be an undue hardship on MidAmerican to test meters that are damaged by flooding and tornados, especially since some of the meters may be contaminated by the floodwaters.

During an average operational year, utilities find meters that are damaged or are not registering at all. In 2007 MidAmerican tested over 35,600 gas meters and found that about 560 of those meters were not registering and could not be tested. In this instance, MidAmerican has more than 6,000 meters that have been damaged by extreme weather. It is reasonable to grant a waiver of the as-found testing requirements when a utility has this many meters damaged by such unusual and widespread events. The waiver covers all of those meters in each of the listed cities damaged by the flooding or tornados that will not be placed back in service. On July 14, 2008, the Board granted a similar waiver request to Interstate Power and Light Company for as-found testing of flood damaged electric meters in Docket No. WRU-08-27-150.

The Board will grant MidAmerican a waiver of the as-found meter testing for those meters that are damaged beyond testing ability by the flooding or tornados and

that will not be placed back in service. In addition, the Board will require MidAmerican to file a report showing the final total number of meters in each listed city not tested under this waiver. The total number of meters not tested should also be broken down by meter type and size.

**IT IS THEREFORE ORDERED:**

1. MidAmerican Energy Company is granted a waiver of 199 IAC 19.6(2)"c" for as-found meter testing of gas meters damaged beyond testing ability by flooding or tornados in the towns listed in this order.

2. Within 60 days after MidAmerican Energy Company has identified the meters that are subject to this waiver, the company shall file a report showing the total number of meters in each city listed in this order not tested under the waiver. The meter totals shall be broken down by meter type and size.

**UTILITIES BOARD**

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/s/ Krista K. Tanner

ATTEST:

/s/ Judi K. Cooper  
Executive Secretary

/s/ Darrell Hanson

Dated at Des Moines, Iowa, this 29<sup>th</sup> day of August, 2008.