

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
UTILITIES BOARD

IN RE:  SOUTHWEST IOWA RURAL ELECTRIC COOPERATIVE	DOCKET NO. WRU-08-36-900
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**ORDER GRANTING MODIFIED WAIVER**

(Issued November 4, 2008)

On September 24, 2008, Southwest Iowa Rural Electric Cooperative (Southwest) filed with the Utilities Board (Board) a request for waiver of 199 IAC 20.6(2)"c," which requires that a utility's electric meter testing program 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.

Southwest is upgrading its metering infrastructure (meter upgrade project) and approximately 6,000 meters will be replaced in a two-year period.

Southwest asks for a waiver of two portions of subrule 20.6(2)"c." First, it seeks a waiver of the requirement to test all meters that are removed from service for any reason; Southwest wants to sample test meters that are removed from service during the two-year meter upgrade period based upon Military Standard sampling procedures. Second, Southwest wants to hold in abeyance its meter testing program for the two years while the meter replacement is taking place. Southwest said all

meters removed will be stored for a minimum of 120 days to allow member-consumers an opportunity to challenge the accuracy of the replaced meter and meter tests will be conducted upon a member-consumer's request. No objections to the waiver request were filed.

In support of the first part of its waiver request, Southwest stated that its tariff provides that all meters removed from service for any reason should be tested pursuant to the Board's rules and Southwest's meter testing program within 180 days. During a two-year period, Southwest will replace all of its approximately 6,000 electric meters. Southwest states that the approximate cost of testing all meters would be over \$60,000; the costs of sample testing would be approximately \$1,250. Southwest said it would store meters that have been removed from service for 120 days in the event a customer has a complaint about the removed meter's registration.

Southwest's second request relates to suspension of its meter testing program for the two years while the new meter system is being installed. Southwest states that because virtually all meters will be replaced during this two-year period, there are few benefits to continuing the meter testing program during the replacement period.

Based on the information filed by Southwest, the Board will grant a waiver of 199 IAC 20.6(2)"c" to allow statistical sample testing of meters removed from service pursuant to the meter upgrade project. The Board believes the burden of testing all meters removed to implement the new meter program substantially outweighs any benefits and application of 199 IAC 20.6(2)"c" would be unduly burdensome.

Southwest's workload and costs would increase significantly with no cognizable benefit to its member-consumers. Southwest will hold meters removed for its meter upgrade project for 120 days, which should allow a member sufficient time to determine if the old and new meter reads are consistent; if they are not, this suggests there might be a problem with accuracy of one of the meters and the old meter will be available for testing. The waiver will be for two years or the duration of the meter upgrade project, whichever comes first. The Board has previously granted similar waivers. See, Maquoketa Valley Electric Cooperative, "Order Granting Modified Waiver," Docket No. WRU-07-41-943 (2/1/2008); MidAmerican Energy Company, "Order Granting Request for Waiver," Docket No. WRU-07-25-156 (10/29/2007).

Also, the Board will waive the subrule to allow Southwest to suspend its general meter testing program during the meter upgrade project. However, Southwest's filing is unclear about its testing plans for meters that are removed from service for reasons other than the meter upgrade project, such as no readings on the meter or damaged meters. Southwest will be required to continue with its existing request meter testing program for all such meters during the implementation phase of its meter upgrade project.

**IT IS THEREFORE ORDERED:**

1. The request for waiver of 199 IAC 20.6(2)"c" filed by Southwest Iowa Rural Electric Cooperative on September 24, 2008, regarding the testing of meters removed from service as part of its meter upgrade project and the suspension of the

normal meter testing program is granted to the extent discussed in this order, effective for two years from the date of this order or for the duration of the meter upgrade project, whichever comes first.

2. Southwest shall maintain its current meter testing program for meters that are removed from service for reasons other than the meter replacement project.

**UTILITIES BOARD**

/s/ John R. Norris

/s/ Krista K. Tanner

ATTEST:

/s/ Judi K. Cooper  
Executive Secretary

/s/ Darrell Hanson

Dated at Des Moines, Iowa, this 4<sup>th</sup> day of November, 2008.