

U-20630 Technical Standards for Electric Service Rulemaking Staff Summary of Identified Issues

Issue	Issue Statement	Staff Proposal
#1 Billing Adjustments	Metering inaccuracies; billing adjustments are improperly located in the technical standards and should be moved to Billing Rules, and there is inconsistent language between the rulesets.	Move applicable sections from Technical Standards to Billing Rules and update to improve consistency between the two rulesets.
#2 Definitions	Words and phrases are not defined in the Technical Standards for Electric Service which leads to lack of clarity and consistency.	Define words/phrases in the Technical Standards including, but not limited to "sustained interruption", "major interruption", "planned interruption", "RTO", "serious injury", and "AMI" or "solid state meter".
#3 Emergency Reporting	Energy Security and Electric Operations Staff do not have immediate access to Company processes related to emergency situations.	Incorporate an Emergency Response Plan filing requirement into the reporting section of the rules to allow Staff to have Company plans readily available when needed (during storm and other emergency situations).
#4 Meter Testing	Metering inspection and testing rules do not currently reflect modern meter accuracy and testing.	Update Parts 3 and 6 of the ruleset to reflect digital AMI meters while considering that analog meters are no longer sold in the United States. Staff is proposing an analog meter testing ruleset and digital meter ruleset to allow for quick elimination of analog requirements in the future updates to the rules.
#5 Vegetation Management	Can the current requirements be updated to ensure effective vegetation management practices that ensure sustained reliability? Rules do not address customer notifications to ensure customer satisfaction or quality assurance to ensure that circuits have been trimmed to the Company's current specifications.	With increased tree trim budgets, it will be important to notify customers of the work going on in the area and to ensure the Company/contractors have performed the work they set out to perform. Incorporate customer notification and post-trim requirements into the vegetation management rule below the current vegetation management language. Staff proposes a quarterly reporting requirement for submittal of vegetation management spending including deviation from Commission approved spending levels.

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#6 Voltage Information	Digital meters (AMI) allow for the ability to capture secondary voltage measurements at the meter which is slightly accounted for in the current voltage measurement rules.	Update Rule 460.3703 - 460.3704 to reflect the additional voltage information available through AMI and to promote the Companies to maximize the potential of technology investments.
#7 Rule 411	The rule applies to "prospective" customers only and should not limit a prospective or existing customer's ability to choose electric service from any nearby utility.	The rule is intended to prohibit unnecessary duplication of facilities for "prospective" customers. The current rule is effective. Staff will continue to work with ABATE and other participants on a potential change to allow industrial customers some level of choice in certain situations.
#8 Standard Frequency	The rule specifies a frequency for AC systems based upon 60 hertz in order to permit synchronizing with customers' clocks. Rule is outdated as not all customer clocks are connected to the system.	Staff proposes to update the outdated language by amending the second sentence of the rule stating, "The frequency shall be maintained within limits that will permit the satisfactory operation of customers' clocks which are connected to the system."
#9 Cyber Standards	The ruleset does not contain any baseline cyber requirements for electric utilities. Staff argues that cybersecurity is a growing issue that is too important to not ensure baseline cyber protections are in place.	Entirely new rule that outlines require specific cybersecurity procedures be established and followed, and that the utility certify annually that they maintain a cybersecurity program in compliance with the rule.
#10 Security Reporting	Due to requested changes from stakeholders, the language of the forthcoming Security Reporting rule in the Technical Standards for Gas Service (U-20608) is no longer consistent with the Security Reporting rule in the existing Technical Standards for Electric Service.	Staff proposes to update Rule 205 so that the Security Reporting language is consistent across the gas and electric technical standards. This is not a change to the substance of Rule 205, but rather a change to improve its clarity and consistency.