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August 23, 2012

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Re: SUPPLEMENTAL COMMENTS - WORKSHOP ON METER GUIDELINES  
DOCKET NO. E-00000C-11-0328

Arizona Public Service Company, Tucson Electric Power Company, UNS Electric, Inc., and Grand Canyon State Electric Cooperative Association, Inc. (collectively "the Utilities") offer these Supplemental Comments on the Draft Proposed Guidelines ("Guidelines") filed by Staff on February 24, 2012 in the above mentioned Arizona Corporation Commission ("Commission") docket. These Supplemental Comments are in response to issues raised during the March 23, 2012 Commission Workshop and represent the collective proposals of the undersigned Utilities.

Sincerely,

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Company

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John Wallace  
Director of Regulatory and Strategic  
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TLM/jj

cc: Parties of Record

Arizona Corporation Commission  
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# Meter Guidelines Utility Comments

August 2012

## **Guideline #1**

**ACC Staff:** *Measurement will not be specific to any particular appliance or electrical device, unless approved by the Commission for a specific tariff.*

**Recommendation:** Unless authorized by the customer or the Commission, electric usage measurement will not be specific to any particular appliance or electrical device. Meters that only measure a single electrical device or a group of such devices will be permitted under this guideline.

## **Guideline #2**

**ACC Staff:** *The utility will not share energy usage data except with its authorized agent. Individual or aggregate usage data will never be sold.*

**Recommendation:** Unless authorized by the customer, the utility will not share customer-specific data except with entities under contract with the utility and bound to comparable confidentiality provisions as would apply to the utility itself. However, such authorization is not required if the data is requested by law enforcement or other public agencies, including the Commission or its staff, or is used in conjunction with legitimate collection activities, or to provide safe and reliable service to the customer. Customer-specific data will never be sold without customer approval. Usage data unaccompanied by any other information that would associate the usage data with a specific customer (e.g., customer name, service address, telephone number, SS# or EIN, etc.) is not considered "customer-specific data" for purposes of this and other guidelines.

## **Guideline #3**

**ACC Staff:** *All information transmitted between meters and the utility must be encrypted and password protected using US government approved and recommended standards.*

**Recommendation:** Customer specific data wirelessly transmitted between meters and the utility must be encrypted and/or password protected. The utility will utilize recognized industry security practices and controls and will continue to evaluate emerging technologies and standards in order to update its security practices, as appropriate, to protect customer specific data.

## **Guideline #4**

**ACC Staff:** *Data from each meter must use specific unique identifiers associated with the customer's meter number and service address to ensure that each customer is billed only for his/her own usage.*

**Recommendation:** Data from each meter must use unique identifier(s) associated with the customer's service to ensure that each customer is billed only for his/her own usage.

# Meter Guidelines Utility Comments

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## **Guideline #5**

**ACC Staff:** *The utility will not control or shut off individual appliances without customer consent based on an approved ACC tariff.*

Recommendation: The utility will not control or shut off individual residential appliances without customer consent or unless authorized by an approved ACC tariff or program.

## **Guideline #6**

**ACC Staff:** *The utility may shut off electric service per ACC rules. The utility will abide by current regulations with respect to shut-off of service and curtailment in power emergencies.*

Recommendation: The utility may shut off electric service per ACC rules or other Commission-approved procedures. The utility will abide by current regulations or other Commission-approved procedures with respect to shut-off of service and curtailment in power emergencies.

## **Guideline #7**

**ACC Staff:** *The utility will limit the length of data transmission over a 24-hour period, (utility input will help define the appropriate length of time in seconds or minutes per time period).*

Recommendation: The utility will only use equipment that limits data transmission, so as to keep RF exposure within the limits established by the Federal Communications Commission.

## **Guideline #8**

**ACC Staff:** *Individual usage data gathered will be available only to the customer, the utility, and its duly authorized agent. Such data may be used only to help the customer or make choices that will help keep electric bills to a minimum.*

Recommendation: Combined with #2 so should be deleted as a separate guideline.

## **Guideline #9**

**ACC Staff:** *The utility will use only aggregate, anonymous data for system planning purposes.*

Recommendation: The utility will use only appropriate and relevant data for system planning purposes.

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delivered/mailed this 23<sup>rd</sup> day of  
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