



Lawrence B. Somers  
Deputy General Counsel

Mailing Address:  
NCRH 20 / P.O. Box 1551  
Raleigh, NC 27602

o: 919.546.6722  
f: 919.546.2694

bo.somers@duke-energy.com

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JUL 24 2018

July 24, 2018

**VIA ELECTRONIC FILING**

M. Lynn Jarvis, Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4300

**RE: Duke Energy Carolinas, LLC's Compliance Filing  
Docket No. E-7, Sub 1115**

Dear Ms. Jarvis:

Pursuant to the Commission's June 22, 2018 *Order Approving Manually Read Meter Rider with Modifications and Requesting Meter-Related Information* and the July 23, 2018 *Order Granting One-Day Extension of Time to Make Compliance Filing*, I enclose Duke Energy Carolinas, LLC's revised Rider MRM, along with a proposed plan and schedule for implementing the Rider, for filing in connection with the referenced matter.

Thank you for your attention to this matter. If you have any questions, please let me know.

Sincerely,

Lawrence B. Somers

Enclosures

cc: Parties of Record

RIDER MRM (NC)  
MANUALLY READ METER RIDER

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AVAILABILITY (North Carolina Only)

Applicable to residential and small general service customers who request a meter that either does not utilize communications to transmit data, or is otherwise required to be read manually, provided that such a meter is available for use by the Company. At the Company’s option, meters to be read manually may be either an advanced meter with the communication capability disabled or other non-communicating meter.

GENERAL PROVISIONS

For residential service, the customer must be served on a standard rate schedule.

For nonresidential service, the customer must be served on Schedule SGS without a demand meter, using less than 3000 kilowatt hours per month and with an estimated demand of less than 15 kW.

This Rider is not available to customers taking service under a net metering rider.

Customers choosing this option will not be eligible for any current or future services or offerings that require the use of a smart or other communicating meter.

The Company may refuse to provide service under this Rider under any of the following conditions.

- If the customer has a history of metering tampering or unauthorized use of electricity at the current or any prior location.
- If such service creates a safety hazard to consumers of their premises, the public or the electric utility’s personnel or facilities.
- If the customer does not provide the Company satisfactory access to its facilities for the purpose of obtaining meter readings or maintaining its equipment.

Upon request, the one-time Initial Set-up Fee may be paid in six equal installments included as a part of the Customer's first six monthly electric service bills following installation of the manually read meter.

The Initial Set-up Fee and Monthly Rate shall be waived and not apply for customers providing a notarized statement from a medical physician fully licensed by the North Carolina Medical Board stating that the customer must avoid exposure to radio frequency emissions, to the extent possible, to protect their health. All such statements shall be retained in Company records on a secure and confidential basis. Customers enrolled in Rider MRM with fees waived will need to be re-verified annually. The Company will provide the customer with a medical waiver form to be verified. The Customer will be notified and must provide, within thirty (30) days, the form to remain on the fee waiver program. If the customer does not provide the form in the allotted time span, the Customer will be subject to the monthly Rider MRM fees. The customer will retain his or her opt-out meter and be responsible for monthly Rider MRM fees until the Company can verify a renewed fee waiver form.

RATE

Initial Set-Up Fee	\$ 150.00
Rate per month	11.75

CONTRACT

The original term of this contract is one year and thereafter until terminated by either party on thirty days’ written notice. The Company reserves the right to terminate the Customer’s contract under this Rider at any time upon notice to the Customer for violation of any of the terms or conditions of the applicable schedule or this Rider. If within the first year, the Customer wishes to discontinue service under this Rider, the customer will pay a \$50.00 service charge.

## **DEC North Carolina MRM Implementation Plan and Schedule**

Pursuant to the Commission's June 22, 2018 *Order Approving Manually Read Meter Rider with Modifications and Requesting Meter-related Information* in Docket No. E-7, Sub 1115; Docket No. E-100, Sub 147; and Docket No. E-100, Sub 153, following is Duke Energy Carolinas, LLC's ("DEC" or the "Company") proposed plan and schedule for implementing the Rider.

### **Rider MRM Processes**

#### **Standard Process**

The effective date for the revised Rider MRM is October 1, 2018. On that date, customers will be able to sign up for Rider MRM on a paid basis or provide the required paperwork to enroll in Rider MRM with fees waived due to health reasons ("medical fee waiver"). Customers interested in signing up for Rider MRM who do not want to seek the medical fee waiver will be able to contact the Company to enroll at their discretion. Upon enrollment, the Rider MRM flag will be applied to the customer account, fees will initiate, and the Company will replace the customer's existing meter with an opt-out meter, which will be an Advanced Metering Infrastructure ("AMI") meter or smart meter with all communications disabled. The one-time setup fee for Rider MRM is eligible for a payment arrangement which will extend payment for the one-time fee over six billing cycles at \$25 per month in addition to the approved monthly rate. Because the payment arrangement and medical fee waiver processes were not anticipated in the Company's original tariff filing, the Company is implementing additional IT changes to ensure proper handling of those requirements. The processes needed to comply with those requirements may need to be handled manually starting October 1 if the IT system changes have not been implemented by that date.

#### **Medical Fee Waiver Process**

On October 1, 2018, customers interested in signing up for Rider MRM who want to seek the medical fee waiver will be able to contact the Company to pursue that process. The Company will provide interested customers with a form to complete in order to have the Rider MRM fees waived due to health reasons. Customers will need to complete the Company-provided form, which will include a notarized statement from a medical physician licensed by the North Carolina Medical Board that the customer must avoid exposure to radio-frequency emissions to the extent possible to protect their health. While the verification process is pending, the customer will retain the existing meter. If the customer is currently enrolled in paid opt-out and decides to pursue the Rider MRM medical fee waiver process, the Company will waive fees for Rider MRM going forward, once the customer's forms are verified and the account is enrolled in the Rider MRM medical fee waiver program. The customer's opt-out meter will remain in place. Fees paid prior to verification will not be credited. Once the Company verifies the customer's medical waiver form, the team processing those forms will apply a Rider MRM medical fee waiver flag to the customer's account, will ensure that Rider MRM fees do not apply, will inform the customer that their form has been verified, and the Company will replace the customer's existing meter with an opt-out meter or leave an opt-out meter in place, if the customer was previously

enrolled in paid Rider MRM service. If the Company cannot verify the customer's medical waiver form, the team processing those forms will inform the customer why the request was denied.

Consistent with current processes for the Medical Alert program, customers enrolled in Rider MRM with fees waived will need to be re-verified annually. The Company will provide the customer with a medical waiver form to again be verified and notify the customer that he or she has 30 days to provide the form to remain on the fee waiver program. If the customer does not provide the form in the allotted time span, the Company will remove the Rider MRM fee waiver flag, apply monthly fees for Rider MRM, and inform the customer that they missed the deadline for annual re-verification. The customer will retain his or her opt-out meter and be responsible for monthly Rider MRM fees until the Company can verify a renewed fee waiver form. The one-time setup fee will not be applied when the customer is removed from the fee waiver program. If the renewed fee waiver form is verified, Rider MRM fees will be waived going forward, but the customer will be responsible for any fees incurred during the lapse in verification.

### **Communications Plan**

#### **Customers on Temporary Bypass List**

Once the tariff is in effect, the Company will begin informing customers on the temporary bypass list that Rider MRM is available through a staggered rollout. The Company will break the list into smaller segments to provide a customer-focused experience in notifying customers on the bypass list. If a customer has not enrolled in paid opt-out or provided Rider MRM medical fee waiver forms to the Company within 60 days, the Company will install a smart meter.

#### **Company Website**

The customer-facing Duke Energy website will be updated to include information about Rider MRM, including the availability of payment arrangements and the medical fee waiver program.

#### **Communications by Phone**

During the AMI deployment, the dedicated AMI Help Line will be able to provide information about Rider MRM and options available to customers. The AMI Help Line will connect customers to the Customer Care Organization if they want to sign up for Rider MRM.

### Rider MRM Costs

In its Order, the Commission also stated, “DEC should explore the feasibility and cost of identifying opt-out customers early and providing them manually-read meters during the AMI deployment, and report back to the Commission as to whether the initial set-up fee could be reduced in those situations.” The Company has considered this and finds that all the same costs would apply for a customer who enrolls in Rider MRM during deployment as a customer who enrolls after the deployment is complete. In either scenario, the customer will need to contact DEC to request service through Rider MRM, so the three minutes of customer service applies. Subsequently, DEC’s metering department will need to spend the five minutes to create work orders to program the AMI meter into “opt-out mode,” schedule a meter exchange, and incorporate the customer into an appropriate manual meter reading route. All DEC customers are starting with an AMR or AMI meter, which will have to be replaced with an opt-out meter. Programming and exchanging the meter is still estimated to take 75 minutes total, with 45 minutes of that time needed for the exchange alone. DEC employees perform those opt-out meter exchanges, rather than the deployment contractors, in part since the Company wants to ensure that a fully informed employee is on site to address any questions that customers might have when an opt-out meter is installed. Additionally, DEC’s meter deployment contractors do not have work flows directed from the IT system functionality that routes meter exchange orders when customers enroll in Rider MRM. The manual meter reading route analysis is still estimated to last 30 minutes. Finally, the IT system costs recovered through the one-time fee apply for all customers participating in Rider MRM, regardless of when they inform the Company that they intend to take service under that rider.

**CERTIFICATE OF SERVICE**

I certify that a copy of Duke Energy Carolinas, LLC's Compliance Filing, in Docket No. E-7, Sub 1115, has been served by electronic mail, hand delivery or by depositing a copy in the United States mail, postage prepaid to the following parties:

David Drooz  
Tim Dodge  
Public Staff  
North Carolina Utilities Commission  
4326 Mail Service Center  
Raleigh, NC 27699-4326  
[david.drooz@psncuc.nc.gov](mailto:david.drooz@psncuc.nc.gov)  
[tim.dodge@psncuc.nc.gov](mailto:tim.dodge@psncuc.nc.gov)

Horace P. Payne, Jr.  
Mark O. Webb  
Dominion Resources  
PO Box 26532  
Richmond, VA 23261  
[horace.p.payne@dom.com](mailto:horace.p.payne@dom.com)  
[mark.webb@dom.com](mailto:mark.webb@dom.com)

Brett Breitschwerdt  
McGuireWoods, LLP  
434 Fayetteville St., Suite 2600  
Raleigh, NC 27601  
[bbreitschwerdt@mcguirewoods.com](mailto:bbreitschwerdt@mcguirewoods.com)

Peter H. Ledford  
NC Sustainable Energy Association  
4800 Six Forks Road, Suite 300  
Raleigh, NC 27609  
[peter@energync.org](mailto:peter@energync.org)

This the 24<sup>th</sup> day of July, 2018.



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Lawrence B. Somers  
Deputy General Counsel  
Duke Energy Corporation  
P. O. Box 1551 / NCRH 20  
Raleigh, NC 27602  
Telephone: 919.546.6722  
[bo.somers@duke-energy.com](mailto:bo.somers@duke-energy.com)