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September 13, 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 Revised Rider MRM, Revised MRM Implementation Plan, and Revised Medical Release and Physician's Verification Forms
Docket No. E-7, Sub 1115**

Dear Ms. Jarvis:

In compliance with the Commission's September 4, 2018 *Order Requiring Amendments to Proposed Tariff*, I enclose Duke Energy Carolinas, LLC's revised Manually Read Meter ("MRM") Rider, revised MRM Implementation Plan, and revised Medical Release and Physician's Verification Statement 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

OFFICIAL COPY

Sep 13 2018

RIDER MRM (NC)
MANUALLY READ METER RIDER

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. The Company will provide the customer with a medical release form, to identify general enrollment information, and a physician verification statement. At the physician’s option, a comparable physician verification statement may be submitted.

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 and September 4, 2018 Orders approving and requiring amendment of the Manually Read Meter ("MRM") Rider in Docket No. E-7, Sub 1115, the following is Duke Energy Carolinas, LLC's ("DEC" or the "Company") revised 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 will be handled manually starting October 1 since the IT system changes will not have 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 required Medical Release form and a Physician's Verification Statement to complete in order to have the Rider MRM fees waived due to health reasons. Customers will need to complete the Company-provided Medical Release form, so that the Company has the necessary information to enroll the customer in the medical fee waiver. Customers will also need to provide 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. Customers can either complete the Company-provided Physician's Verification Statement or a comparable physician's statement. 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.

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 June 22, 2018 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 three minutes of customer service applies. Subsequently, DEC's metering department will need to spend 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.

REQUIRED Medical Release Form

I certify that I am a member of the household at the customer address shown below and hereby authorize my Physician (as identified below) to complete the Physician's Verification Statement, or a comparable physician's statement, and send it to Duke Energy and its authorized representatives to consider the Customer's Account for the Smart Meter Medical Opt-Out.

Full Name of Patient _____

Patient Date of Birth _____

Signature of Patient or
Legal Guardian _____

Physician Name _____

Physician Office Address _____

City _____ State _____ Zip Code _____

Physician Phone Number (____) _____ Physician Fax Number (____) _____

Duke Energy
Customer Name _____

Customer Account # _____

Customer Address _____

City _____ State _____ Zip Code _____

Customer Phone _____

Customer Email _____

I, as the Customer of record, understand that (1) I am obligated to pay my monthly electric bill by the date shown on the monthly bill, (2) failure to make timely payments or suitable payment arrangements may result in disconnection of service.

I acknowledge that I have read and understand the above conditions for receiving the Medical Opt-Out program on my electric service account.

Duke Energy
Customer Signature _____

Email: MedicalOpt-Out@duke-energy.com
Fax: 800-219-9276
Mail: Duke Energy
Attn: DT01X
9700 David Taylor Dr.
Charlotte, NC 28262

Physician's Verification Statement

Customer Name:
Duke Energy Account Number:

Please have a medical physician licensed by the North Carolina Medical Board complete this or a comparable statement, execute it in the presence of a Notary Public, and return to Duke Energy within 60 days. Failure to complete this form, or a comparable physician statement, in its entirety may result in disqualification for waiver of fees under the Manually Read Meter Rider (Rider MRM).

Patient Name: _____

Patient Address: _____

I, _____, affirm that I am a medical physician licensed by the North Carolina Medical Board. I further affirm that the above-named patient must avoid exposure to radio frequency (RF) emissions to the extent possible to protect his or her health.

STATE OF NORTH CAROLINA

COUNTY OF _____

Subscribed and sworn to before me this the
_____ day of _____, 20_____

Notary Public for North Carolina
My Commission Expires: _____

Physician's signature

Physician's name (please print)

Physician's License Number

Physician's daytime phone number(s)

PLEASE RETURN THE COMPLETED AND NOTARIZED PHYSICIAN'S VERIFICATION TO:

Email: MedicalOpt-Out@duke-energy.com
Fax: 800-219-9276
Mail: Duke Energy
Attn: DT01X
9700 David Taylor Dr.
Charlotte, NC 28262

CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC's Revised Rider MRM, Revised MRM Implementation Plan, and Revised Medical Release and Physician's Verification Forms, 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:

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This the 13th day of September, 2018.



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