

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of	)	
<b>CONSUMERS ENERGY COMPANY</b>	)	
for approval of a temporary waiver of Rule 460.3604	)	Case No. U-20639
and for approval of alternative electric meter	)	
testing procedures.	)	
_____	)	

At the December 19, 2019 meeting of the Michigan Public Service Commission in Lansing,  
Michigan.

PRESENT: Hon. Sally A. Talberg, Chairman  
Hon. Daniel C. Scripps, Commissioner  
Hon. Tremaine L. Phillips, Commissioner

**ORDER**

On October 7, 2019, Consumers Energy Company (Consumers) filed an application requesting a temporary waiver of the Commission’s meter testing requirements in its Technical Standards for Electric Service (Technical Standards), Mich Admin Code, R 460.3604 (Rule 604), and seeking *ex parte* approval of alternative testing procedures for advanced metering infrastructure (AMI) electric meters that are being removed from service and upgraded from 3G technology to 4G technology.

Consumers states that, as a result of telecommunications companies transitioning away from 3G technology, Consumers will need to remove from service approximately 680,000 AMI meters and upgrade them to 4G technology. These meters cannot be upgraded in the field, but must be removed from service, replaced, and then sent to Consumers’ AMI vendor to perform the upgrade.

Consumers indicates that approximately 260,000 of the meters will be replaced with new meters, with the remaining 420,000 meters retrofitted to 4G technology. Once upgraded, AMI meters will be returned to service and will be used to replace the remaining 3G AMI meters that also must be upgraded. Consumers anticipates beginning the meter upgrade process in 2020 and expects the upgrades to take about two years to complete.

Rule 604 of the Technical Standards requires that “[a]ll meters and associated devices shall be tested after they are removed from service unless they are retired because of obsolescence.” Consumers requests a temporary waiver of Rule 604 so that Consumers is not required to test all 680,000 AMI meters removed from service in order to upgrade the meters from 3G to 4G technology. Consumers states that it would be very costly and burdensome for the company to test these 680,000 meters in a two-year time period. Consumers also states that 3G AMI meters tested after removal from service in 2012 through 2018 had an average accuracy of over 99.8%, and that its vendor will test the communication functionality and perform a full load accuracy test on all meters before returning the meters to Consumers.

Consumers’ requested an alternative testing procedure for these AMI electric meters. This alternative testing procedure would lot and sample test the meters per the American National Standards Institute standard Z1.9. Consumers proposes to group the meters into lots of 35,000 meters, with 75 meters tested from each lot, and 1,500 meters tested across all lots per year. Consumers proposes to perform this sample testing twice, testing a total of 3,000 meters over the two-year upgrade period. Consumers states that this lot and sample testing procedure is consistent with Rule 613 of the Technical Standards, Mich Admin Code, R 460.3613, and Consumers’ annual meter testing procedures. In order to implement the requested meter testing waiver,

Consumers also proposes to amend Section B1, Part 6 of the company's Rate Book for Electric Service as set forth in Exhibit A to this order.

The Commission, having considered Consumers' application, finds the requested relief reasonable and in the public interest because it will permit Consumers to upgrade AMI meters to be compatible with changing communication platforms and incorporate reasonable testing procedures for the meters removed from service. The Commission further finds that *ex parte* review and approval is appropriate because approval of the application will not affect rates or rate schedules and will not result in an increase in the cost of service to customers. MCL 460.6a(3). Accordingly, the Commission approves the application and grants the requested relief. The Commission is not addressing the prudence of Consumers' plan to convert AMI meters to 4G technology.

THEREFORE, IT IS ORDERED that:

A. Consumers Energy Company's request to waive the meter testing requirements in the Commission's Technical Standards for Electric Service, Mich Admin Code, R 460.3604, for the limited purpose of permitting the upgrade of 3G advanced meter infrastructure meters to 4G technology until the end of 2022 is approved.

B. Consumers Energy Company's request to lot and sample test the 3G advanced meter infrastructure meters removed from service for the purpose of the upgrade to 4G technology, resulting in testing 1,500 meters across all lots per year, for a total of 3,000 meters tested over the two-year upgrade period, is approved.

C. Consumers Energy Company's request to amend Section B1, Part 6 of the company's Rate Book for Electric Service, attached as Exhibit A to this order, is approved.

D. Within 30 days, Consumers Energy Company shall file a tariff sheet that is substantially similar to Exhibit A to this order.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26. To comply with the Michigan Rules of Court's requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission's Executive Secretary and to the Commission's Legal Counsel.

Electronic notifications should be sent to the Executive Secretary at [mpscedockets@michigan.gov](mailto:mpscedockets@michigan.gov) and to the Michigan Department of the Attorney General - Public Service Division at [pungpl@michigan.gov](mailto:pungpl@michigan.gov). In lieu of electronic submissions, paper copies of such notifications may be sent to the Executive Secretary and the Attorney General - Public Service Division at 7109 W. Saginaw Hwy., Lansing, MI 48917.

MICHIGAN PUBLIC SERVICE COMMISSION

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Sally A. Talberg, Chairman

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Daniel C. Scripps, Commissioner

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Tremaine L. Phillips, Commissioner

By its action of December 19, 2019.

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Lisa Felice, Executive Secretary

(Continued From Sheet No. B-1.00)

**B1. TECHNICAL STANDARDS FOR ELECTRIC SERVICE (R 460.3101 - R 460.3804) (FOR ALL CUSTOMERS)  
(Contd)****PART 6. METERING EQUIPMENT INSPECTIONS AND TESTS****R 460.3601 Customer-requested meter tests.**

Refer to the Company's approved Rule C7., Metering and Metering Equipment.
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**R 460.3602 Meter and associated device inspections and tests; certification of accuracy.****R 460.3603 Meters with transformers; post-installation inspection; exception.****R 460.3604 Meters and associated devices; removal tests.**

*The Commission granted the Company a waiver of the Rule 604 meter testing requirements for the limited purpose of permitting the upgrade of Advanced Metering Infrastructure (AMI) electric meters from 3G technology to 4G technology without testing all removed meters in Case No. U-20639 dated XXXX XX, 20XX. The Company will lot and sample test 1500 of the removed meters per year across all lots for a period of two years. Once this upgrade is complete the waiver will no longer apply.*

**R 460.3605 Metering electrical quantities.****R 460.3606 Nondirect reading meters and meters operating from instrument transformers; marking of multiplier on instruments; marking of charts and magnetic tapes; marking of register ratio on meter registers; watthour constants.****R 460.3607 Watthour meter requirements.****R 460.3608 Demand meters, registers, and attachments; requirements.****R 460.3609 Instrument transformers used in conjunction with metering equipment; requirements; phase shifting transformers; secondary voltage.****R 460.3610 Portable indicating voltmeters; accuracy.****R 460.3611 Meter testing equipment; availability; provision and use of primary standards.****R 460.3612 Test standards; accuracy.****R 460.3613 Metering equipment testing requirements.****R 460.3614 Standards check by the Commission.****R 460.3615 Metering equipment records.****R 460.3616 Average meter error; determination.****R 460.3617 Reports to be filed with the Commission.****R 460.3618 Generating and interchange station meter tests; schedule; accuracy limits.****PART 7. STANDARDS OF QUALITY OF SERVICES****R 460.3701 Alternating current systems; standard frequency.****R 460.3702 Standard nominal service voltage; limits; exceptions.****R 460.3703 Voltage measurements and records.****R 460.3704 Voltage measurements; required equipment; periodic checks; certificate or calibration card for standards.****R 460.3705 Interruptions of service; records; planned interruption; notice to Commission.****PART 8. SAFETY****R 460.3801 Protective measures.****R 460.3802 Safety program.****R 460.3803 Energizing services.****R 460.3804 Accidents; notice to Commission.****B2. CONSUMER STANDARDS AND BILLING PRACTICES FOR ELECTRIC AND NATURAL GAS SERVICE (R 460.101 - R 460.169)**[http://dmbinternet.state.mi.us/DMB/ORRDocs/AdminCode/1779\\_2018-001LR\\_AdminCode.pdf](http://dmbinternet.state.mi.us/DMB/ORRDocs/AdminCode/1779_2018-001LR_AdminCode.pdf)**PART 1. GENERAL PROVISIONS****R 460.101 Applicability; purpose.****R 460.101a Scope of rules.****R 460.102 Definitions; A to F.****R 460.102a Definitions; G to P.****R 460.102b Definitions; Q to Z.****R 460.103 Discrimination prohibited.****R 460.104 Conduct of proceedings.****R 460.105 Additional rules.**

(Continued on Sheet No. B-3.00)

Issued XXXX XX, 20XX by  
Patti Poppe,  
President and Chief Executive Officer,  
Jackson, Michigan

Effective for service rendered on  
and after XXXX XX, 20XX

Issued under authority of the  
Michigan Public Service Commission  
dated XXXX XX, 20XX  
in Case No. U-XXXXX


# PROOF OF SERVICE

STATE OF MICHIGAN )

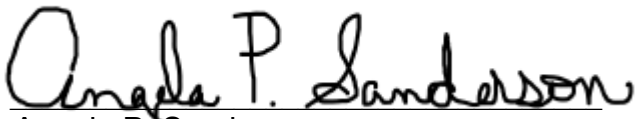
Case No. U-20639

County of Ingham )

Brianna Brown being duly sworn, deposes and says that on December 19, 2019 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).

  
Brianna Brown

Subscribed and sworn to before me  
this 19<sup>th</sup> day of December 2019.



Angela P. Sanderson  
Notary Public, Shiawassee County, Michigan  
As acting in Eaton County  
My Commission Expires: May 21, 2024

**Service List for Case: U-20639**

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Name	Email Address
Consumers Energy Company 1 of 2	mpsc.filings@cmsenergy.com
Consumers Energy Company 2 of 2	michael.torrey@cmsenergy.com
Gary A. Gensch Jr.	gary.genschjr@cmsenergy.com