



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

August 13, 2019

A. Shonta Dunston, Deputy Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

Re: Docket No. W-218 Sub 497

Dear Ms. Dunston:

In connection with the above-captioned docket, I transmit herewith for filing on behalf of the Public Staff Supplemental Comments on Aqua North Carolina, Inc's AMR Affidavit Filing.

By copy of this letter, I am serving all parties of agreement.

Sincerely yours,

/s/ William E. Grantmyre
Staff Attorney
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WEG/sld

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Aug 13 2019

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. W-218, SUB 497

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Application by Aqua North Carolina,)	
Inc., 202 MacKenan Court, Cary, North)	PUBLIC STAFF
Carolina 27511 for Authority to Adjust)	SUPPLEMENTAL COMMENTS
and Increase Rates for Water and)	ON AQUA NORTH CAROLINA,
Sewer Utility Service for all Areas)	INC.'S AMR AFFIDAVIT FILING
in North Carolina)	

NOW COMES THE PUBLIC STAFF – NORTH CAROLINA UTILITIES COMMISSION (Public Staff), by and through its Executive Director, Christopher J. Ayers, and respectfully submits the following supplemental comments for Commission consideration.

BACKGROUND

On July 26, 2019, the Public Staff filed Public Staff Comments on Aqua North Carolina, Inc.'s AMR Affidavit Filing. The Public Staff stated that the Public Staff reserved the right to file supplemental comments as the Public Staff had not received Aqua North Carolina, Inc.'s (Aqua NC) responses to several items on Public Staff Legal Data Request No. 1 (Legal DR. 1). The Public Staff did receive the Aqua NC responses the afternoon of July 26, 2019. The Public Staff has thoroughly reviewed these Aqua NC responses.

Supplemental Comments

The Public Staff is very concerned that the customers are paying for the AMR meters, but the daily read history information is not being readily shared with

customers when specific water customers have usage disagreements with Aqua NC. Aqua NC stated in the response to Legal DR. 1 Item No. 10 (copy attached and emphasis added) that the information “can be” shared with a customer, but not that the daily usage information “is being shared.” In addition, Aqua NC has not notified customers that this usage information can be provided. There is not a viable reason why Aqua NC cannot provide the AMR daily usage readings to specific customers that have usage disagreements with Aqua NC. It should be noted that Aqua controls the 40-day meter read history and the data is only available after the regular monthly meter reading cycle or a special premise visit.

On July 31, 2019, in Docket No. W-218, Sub 497A, the Public Staff filed the Public Staff’s Second Quarter of 2019 Report on Aqua Water Quality Complaints (WQ Report). This WQ Report on pages 3 to 6, discussed a customer with a water quality complaint by a customer in Greycliff. The customer’s usage was also an issue in the complaint. However, Aqua NC did not share the customer daily usage information until the customer complained to the Public Staff Consumer Services, and then Aqua NC provided the daily usage information nearly a month after the initial complaint. Customers should not have to complain to the Public Staff Consumer Services in order to receive their AMR daily readings. The Public Staff WQ Report on pages 4 and 5 states:

“The data from Aqua’s automated meter reading (AMR) technology is not being regularly shared with customers. In this instance, the customer contacted Aqua and felt the response was unsatisfactory and sought the assistance of the Public Staff. Aqua didn’t provide the daily meter reading data until it had an opportunity to review the data and provide its interpretations of the data as part of an official response to Consumer Services’ intervention”.

The Public Staff recommendations:

1. That the Commission order Aqua NC to continue to file updated reports every six months on Aqua NC's progress on Ordering paragraphs 26 and 27, with the opportunity for the Public Staff and other intervenors to file comments.
2. That the Commission order Aqua NC when a customer with an AMR water meter has a usage disagreement with Aqua NC, that Aqua NC provide that customer the AMR daily readings for the period of the disagreement.

Respectfully submitted, this the 13th day of August, 2019.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David T. Drooz
Chief Counsel

Electronically submitted
s/William E. Grantmyre
Staff Attorney

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CERTIFICATE OF SERVICE

I, William E. Grantmyre, hereby certifies that I served the foregoing Public Staff Supplemental Comments on Aqua North Carolina, Inc.'s AMR Affidavit Filing has been served on the attorneys for Aqua North Carolina, Inc., Jo Anne Sanford and Robert H. Bennink, Jr., Margaret Force and Teresa Townsend of the Attorney General's Office, and Eric Galamb, Intervenor, by electronic delivery upon agreement of the parties.

This the 13th day of August, 2019.

Electronically submitted
s/William E. Grantmyre

**Aqua North Carolina, Inc.
Docket No. W-218, Sub 497
Public Staff Legal Data Request # 1
Date Requested: July 9, 2019
Date Due: July 19, 2019**

Public Staff Legal Contact: William E. Grantmyre
Phone #: (919) 733-0977
Email: william.grantmyre@psncuc.nc.gov

Subject of Data Request: AMR Benefits

Please provide any available responses electronically. If in Excel format, be sure to include all working formulas. In addition, please include (1) the name and title of the individual who has the responsibility for the subject matter addressed therein, and (2) the identity of the person making the response by name, occupation, and job title.

Question 10

- Q. Please provide a detailed explanation why 10 months after the Aqua NC Sub 497 general rate case hearing in September 2019, when the Aqua NC customers are paying in rates for more than \$6.0 million in rate base for AMR water meters, yet the meter readings are not available to customers upon the customers' specific request.
- A. The meter readings collected from the AMR water meters are currently used as an investigative tool to help resolve customer or system related issues. At present time, this data is currently available to a limited number of internal Aqua staff. When needed it can be pulled and formatted to meet the investigatory needs and when necessary can be provided to a customer that has made a specific request. Aqua has not communicated this availability to the customers, yet, as it requires ad hoc manipulation to obtain and analyze to utilize it in a useful manner.

Aqua America is expanding the Company's meter data management system ("Automated Meter Reading Application" or "AMRA") to store and present the meter readings collected from water meters with the upgraded AMR technology (100W ERT). The project is anticipated to be complete in Q1 of 2020 and meter readings will be readily available for an Aqua America representative to share this information with customers upon their specific request. At the appropriate time, Aqua NC will communicate to its applicable customer base that the usage data is available upon their request in a manner yet to be determined.

In summary, expanding a water utility's meter data management system, or any data management system, takes time to design, test, and implement. It is critical that this data be presented in a usable and valuable format. The project to expand the Company's AMRA system requires the participation and testing from several

departments to ensure the data is accurate and free of errors and can be incorporated into workflows.

Furthermore, Aqua America representatives will need to be trained to understand and use this data prior to announcing its availability to our customers. Our goal is to train, educate, and prepare our employees so our customers receive the best possible service when requesting it.

Prepared by:

L. Gresehover, National Metrology Manager