

Original Filing

Public Utilities Commission of Nevada

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Filed For: Staff Counsel Division

In accordance with NRS Chapter 719,
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by: /s Cordovash

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Staff Counsel Division

**PUBLIC UTILITIES COMMISSION OF NEVADA
DRAFT NOTICE (Applications, Tariff Filings,
Complaints, and Petitions)**

Pursuant to Nevada Administrative Code (“NAC”) 703.162, the Commission requires that a draft notice be included with all applications, tariff filings, complaints and petitions. Please complete and include **ONE COPY** of this form with your filing. (Completion of this form may require the use of more than one page.)

A title that generally describes the relief requested (see NAC 703.160(4)(a)):

The Regulatory Operations Staff (“Staff”) of the Commission requests that the Commission issue an Order directing Nevada Power Company d/b/a NV Energy (“NPC”) and Sierra Pacific Power Company d/b/a NV Energy (“Sierra”, collectively, “NV Energy”) to file requested information with the Commission regarding the advanced metering infrastructure (“AMI”).

The name of the applicant, complainant, petitioner or the name of the agent for the applicant, complainant or petitioner (see NAC 703.160(4)(b)):

Regulatory Operations Staff of the Commission

A brief description of the purpose of the filing or proceeding, including, without limitation, a clear and concise introductory statement that summarizes the relief requested or the type of proceeding scheduled **AND** the effect of the relief or proceeding upon consumers (see NAC 703.160(4)(c)):

Staff believes it would be prudent for the Commission to gather some information from NV Energy regarding the AMI and any fires which have occurred where NV Energy equipment was involved. Staff therefore requests that the Commission issue an Order directing NV Energy to file requested non-privileged relevant data, analyses and reports with the Commission regarding the AMI.

A statement indicating whether a consumer session is required to be held pursuant to Nevada Revised Statute (“NRS”) 704.069(1):

No.

If the draft notice pertains to a tariff filing, please include the tariff number **AND** the section number(s) or schedule number(s) being revised.

Not applicable.

1 NRS 704.069 states in pertinent part:

1. The Commission shall conduct a consumer session to solicit comments from the public in any matter pending before the Commission pursuant to NRS 704.061 to 704.110 inclusive, in which:

(a) A public utility has filed a general rate application, an application to recover the increased cost of purchased fuel, purchased power, or natural gas purchased for resale or an application to clear its deferred accounts; and

(b) The changes proposed in the application will result in an increase in annual gross operating revenue, as certified by the applicant, in an amount that will exceed \$50,000 or 10 percent of the applicant’s annual gross operating revenue, whichever is less.

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8
9
10 **BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

11 Petition of the Regulatory Operations Staff of the
12 Commission for an Order directing Nevada Power
13 Company d/b/a NV Energy and Sierra Pacific
14 Power Company d/b/a NV Energy to file
15 requested information with the Commission
16 regarding the advanced metering infrastructure.

Docket No. 14-09 _____

17
18
19 **PETITION FOR ORDER REQUESTING INFORMATION**

20 COMES NOW, the Regulatory Operations Staff (“Staff”) of the Public Utilities Commission
21 of Nevada (“Commission”), and pursuant to Nevada Revised Statutes (“NRS”) 703.191 and 703.195,
22 and Nevada Administrative Code (“NAC”) 703.540, hereby files this Petition requesting that the
23 Commission issue an Order directing Nevada Power Company d/b/a NV Energy (“NPC”) and Sierra
24 Pacific Power Company d/b/a NV Energy (“Sierra”, collectively, “NV Energy”) to file requested
25 information with the Commission regarding the advanced metering infrastructure (“AMI”).

26 **BACKGROUND**

27 In an Order dated July 30, 2010, in consolidated dockets Docket Nos. 10-02009, 10-03022,
28 and 10-03023, the Commission granted NV Energy’s request to implement an Advanced Service
Delivery program which included AMI. On September 12, 2014, Staff received a copy of an incident
report prepared by the Reno Fire Department regarding a fire that occurred at 7625 Rhinestone
Circle, Reno on July 27, 2014. At the request of the Reno and Sparks Fire Departments, Oracle
Forensics analyzed the Sensus meter at the Rhinestone residence, as well as several other fires within

1 the Reno and Sparks Fire Departments' purview. Oracle Forensics stated that "a common failure
2 mode cannot be eliminated and needs to be seriously considered regarding the Sensus smart meters."

3 Staff recognizes that the Mission of the Nevada State Fire Marshall is to:

4 The mission of the State Fire Marshall is to protect life, property and the environment
5 from fires and hazardous materials in the State of Nevada.

6 And

7 The State Fire Marshall Division's mission accomplished by development and
8 application of fire prevention education, fire service training, fire protection
9 engineering, licensing/permitting and investigative/enforcement services delivered
10 directly or in coordination with the public safety community.¹

11 Accordingly, Staff does not desire to interfere with the jurisdiction, authority or investigation of the
12 State Fire Marshall or the Reno and Sparks Fire Departments in their duties to ensure public safety.

13 Nonetheless, it has been several years since NV Energy rolled out its AMI initiative. Given
14 the lingering safety question presented by the Reno and Sparks Fire Department's expert, Oracle
15 Forensics, Staff believes it would be prudent for the Commission to gather some information from
16 NV Energy regarding the AMI and any fires which have occurred where NV Energy equipment was
17 involved. Staff requests that NV Energy file non-privileged relevant data, analyses and reports with
18 the Commission. Staff recognizes that the Commission does not employ a forensic fire expert;
19 however, Staff believes this preliminary information is required to ascertain whether any further
20 inquiry is necessary.

21 **REQUESTED INFORMATION**

22 Staff requests the Commission order NV Energy to file the following information with the
23 Commission within 60 days of a Commission Order:

- 24 1. Please provide a copy of all fire investigative reports related to meters that were created by or
25 prepared on the behalf of NV Energy since the year 2000.
- 26 2. Please provide a list of all meter failures and/or alleged fires at or near meters that have
27 occurred since 2000, including but not limited to the following information: the make,
28 type/version, model number, serial number, manufactured date, the name of the company that

¹ www.fire.nv.gov/about_us/Mission

1 installed the meters, the installation date of the meter, the date any hot socket detection
2 function was made operational, and the age of the building/residence and the age of the
3 pedestal and panel boxes the AMI meters were installed in.

- 4 3. Please provide a copy of all internal NV Energy investigative reports prepared since 2000
5 related to meter failures.
- 6 4. Please provide a copy of any and all AMI meter investigative analyses within NV Energy's
7 possession performed by other utilities, suppliers, fire officials, and/or any other entities.
- 8 5. Please provide a list containing all make, type/version and model numbers of AMI meters
9 installed within NV Energy's service territories.
- 10 6. Please provide a copy of updated technical specifications and operating manuals for every
11 make, type/version and model of AMI meters installed within NV Energy's service territories.
- 12 7. Please explain why Sensus has had multiple versions of its AMI meter (Generations 1 through
13 4). Additionally, please explain if additional versions are contemplated, and if so, what are
14 the reasons for those additional versions.
- 15 8. Please describe all of the functionalities that exist for every make, type/version and model of
16 AMI meters installed within NV Energy's service territories and please describe which
17 functionalities NV Energy currently utilizes.
- 18 9. Please provide the date when AMI meters were first deployed in NV Energy's northern and
19 southern service territories.
- 20 10. Please list the number of meter exchanges performed by year, by utility, from 2000 until the
21 present.
- 22 11. Please explain if NV Energy's AMI meter installation program is complete for both of its
23 service territories. If the program is not complete, please answer the following:
- 24 How many more AMI meters need to be installed?
- 25 What areas will the installations take place?
- 26 What type/version/model of meters will be used at these locations?
- 27
- 28

1 If the manufacturer of the meters forecasted to be installed is not Sensus, please
2 explain why another brand of metering is being utilized.

3
4 12. Please explain if the hot socket detection/alarm functionality of the AMI meters is functional
5 and fully implemented system-wide. If the hot socket detection/alarm functionality is fully
6 functional, please outline the date on which full functionality of the hot socket
7 detection/alarming occurred. If the hot socket detection/alarm functionality has not yet been
8 made fully functional, please provide the number and percentage of meters that do have this
9 functionality activated. Additionally, please provide a schedule of when the hot socket
10 detection/alarm functionality will be fully implemented.

11
12 13. Please explain how the hot socket detection/alarm functionality operates and please describe
13 in detail NV Energy's procedure for handling an incoming alarm.

14
15 14. Please explain if the Company has ever performed any infrared heat scanning of meter
16 pedestals or panel boxes to detect any overheating that might have occurred since the
17 installation of AMI meters. If infrared heat scanning has been performed, please describe
18 how many scans have been performed and provide the results of such scans.

19
20 15. Please provide the number of times the AMI meter remote disconnection function has been
21 utilized (segregating the data for both north and south) since the installation of the AMI
22 meters. Additionally, please explain any failure issues that have arisen with the use of the
23 remote disconnect function.

24
25 16. Please provide a list of companies (including qualifications) that NV Energy has hired to
26 perform AMI meter installation and repairs.

27
28 17. Please explain if the companies hired to install AMI meters were required to inspect meter
sockets for issues, such as burnt or loose jaws, before installing the new AMI meters. If so,
please explain how often damaged sockets were reported by the companies and explain how
NV Energy handled these reported situations.

18. Please provide the number of fires that occurred where local fire departments determined that
the ignition source for the fires were the meters and/or panel boxes from 2000 through 2005,
2006 through 2010, and 2011 through 2014.

1 19. Please provide the total number and types of failures that have occurred with the AMI meters
2 installed within NV Energy's service territory. For example, failures due to excessive heat,
3 communication issues, hot socket detection, remote disconnect switch issues, etc.

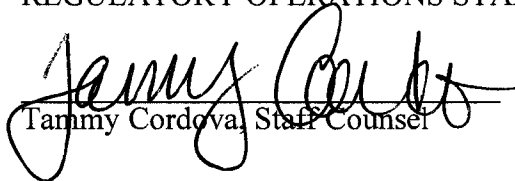
4 20. Please provide the name, case number and date of any litigation where NV Energy was a
5 named party involving fires and NV Energy meters since 2000.

6 **CONCLUSION**

7 Staff respectfully requests the Commission grant this petition, issuing an Order directing NV
8 energy to provide the requested information. Once the information has been filed with the
9 Commission, if warranted, Staff will request further relief from the Commission in the future.

10
11 RESPECTFULLY SUBMITTED this 27th day of September, 2014.

12 PUBLIC UTILITIES COMMISSION OF NEVADA
13 REGULATORY OPERATIONS STAFF

14 
15 Tammy Cordova, Staff Counsel

PROOF OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding by electronic mail to the recipient's current electronic mail address properly addressed to:

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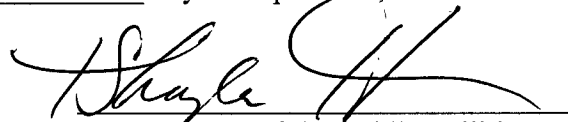
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DATED at Las Vegas, Nevada, on the 22nd day of September, 2014.


An employee of the Public Utilities
Commission of Nevada