

**Electricity Meter Complaint/Dispute Investigations**

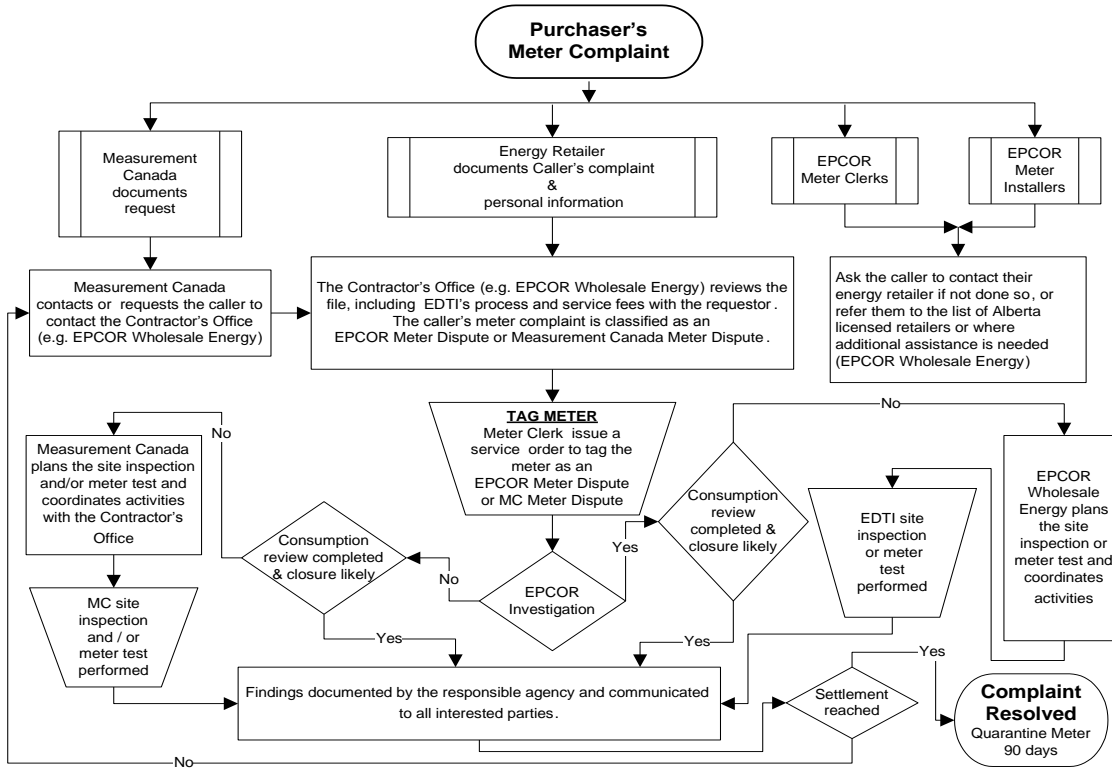
Date: 2012/09/13

Revision 20

Approved by: Greg Berringer

**EPCOR Distribution & Transmission Inc.**

**1 Purchaser Meter Complaint / Dispute Process**



**Introduction - Part I**

**1.0 Contact Information**

a) EPCOR Distribution and Transmission Inc. (EDTI)

If a customer asks for information related to the purchase or sale of electricity, EPCOR owner, employees, agents and contractors will provide the customer with the following **Fair Competitive Statement**:

**“Electricity products and services are competitive. You are free to choose a retailer. Regulated wires services are not dependent upon the retailer you choose. You can find a listing of licensed Alberta retailers at [www.ucahelps.gov.ab.ca](http://www.ucahelps.gov.ab.ca) or call **780-310-4UCA (310-4822)** (toll free in Alberta).”**



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If an inquiry is received from a purchaser on a meter complaint, high energy bill or they would like their meter tested, refer them to the appropriate number below. If a purchaser requests their retailers phone number you may suggest that it should be on the top of their bill. If and only when the purchaser directly asks for the **EPCOR Energy Alberta Inc.** (EPCOR affiliate retailer) phone number, you may relay the EPCOR Contact Center number of (780)-412-4000.

Where there is a need to provide assistance to the caller beyond that of the Retailer,

- for **self-contained meters**, you may relay the EPCOR Wholesale Energy number of (780)-412-7899,
- for **transformer-rated meters**, you may relay the EPCOR Wholesale Energy number of (780)-412-3875,

### b) EPCOR Wholesale Energy

E-mail: [retcomm@epcor.ca](mailto:retcomm@epcor.ca)

Internal / External & Measurement Canada – Residential & Commercial sites

Retail Communications, External & Measurement Canada – Residential (self contained meter sites)

Ph: (780)-412-7899

Retail Communications, External & Measurement Canada - Commercial (transformer rated meter sites)

Ph: (780)-412-3875

Senior Manager, Wholesale Energy

Commercial Sites, including Measurement Canada

Ph: (780)-412-4030

Fax: (780)-412-7801

### c) Measurement Canada's Regional Office

John Pheifer

Regional Manager, Electricity and Gas

Measurement Canada

Winnipeg, Manitoba

Tel: 204-983-3804

Fax: 204-983-3159

E-mail: [john.pheifer@ic.gc.ca](mailto:john.pheifer@ic.gc.ca)

Contact for EPCOR Wholesale Energy

## 1.1 Purpose

To set out a means of monitoring, planning, investigating and resolving a purchaser's meter complaint in accordance with Measurement Canada's policy and EDTI's established business practices. EPCOR Distribution & Transmission Inc. (EDTI) shall ensure that all purchaser inquiries of concern about the condition or performance of a meter or amount of charge related to the service is addressed as a potential request for measurement dispute investigation.

## 1.2 Scope

EDTI's Meter Complaint/Dispute Investigation Procedure applies in all cases where the purchaser, their retailer and or Measurement Canada has raised a concern about the condition or performance



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of a meter or amount of charge related to the service. EDTI is responsible in performing a review, which may involve analysis and such other functions as documented in this procedure

EDTI Meter Operations is an accredited Meter Service Organization on behalf of Measurement Canada and is committed to offering products and services that comply with all applicable legal and regulatory requirements,

This document is the subject of a suitable arrangement between EPCOR Distribution & Transmission Inc. (EDTI – also referred to as the Contractor) and Measurement Canada’s Office that encompasses:

- Purchaser’s request via the Contractor’s Office
- Purchaser’s request via Measurement Canada
- Contractor’s request via Measurement Canada

EDTI Meter Operations makes no representation as to the completeness of this document and reserves the right to amend the procedure and associated documentation.

Business Sections associated with this process within EPCOR Metering & Wholesale Energy are:

- MDM & Customer Service
- Tariff & Settlement
- Meter Operations

A purchaser’s meter complaint shall be processed in such a manner that would not jeopardize a dispute investigation by Measurement Canada or a dispute investigation where MC intervenes. *In the event a situation arises where Measurement Canada intervenes on behalf of a customer’s concern and the device is identified by way of the Trouble Meter process, EDTI Meter Operations shall be contacted immediately to tag the device as a Measurement Canada Meter Dispute.*

### 1.3 Authority

EDTI’s Meter Dispute Investigation Procedure is modelled after Measurement Canada’s Dispute Investigation Procedure P-EG-01. This procedure is in part an amended process supported by Measurement Canada and is not comprehensive in all aspects. *P-EG-01 can be viewed on Measurement Canada’s website @ [www.mc.ic.gc.ca](http://www.mc.ic.gc.ca) “Laws and Requirements / Procedures”.*

EPCOR Wholesale Energy is the business section having the authority to release applicable sections of EDTI’s Meter Dispute Investigation Procedure to retailers within EDTI’s territory and ensuring EDTI policies are understood.

### 1.4 Reference

P-EG-01, S-E-02 & Electricity & Gas Inspection Act / Regulations

### 1.5 Terminology

- **Contractor** – includes any person or body that undertakes responsibilities required under legislation involving transactions for the sale of electricity.
- **EPCOR Wholesale Energy**, including Market Interface may be referred to as Wholesale Energy within this document,



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- **Measurement Canada** is a government agency of Industry Canada that is responsible for ensuring a fair and competitive marketplace for Canadians in the area of measurement and may be referred to as MC,
- **Measurement Investigation** – planning, scheduling and performing a meter test. For transformer rated meters an installation inspection is also performed,
- **Purchaser** – As defined under the Department of Justice Canada Electricity and Gas Inspection act; “means any person to whom electricity or gas is sold”. Where consent is given, the purchaser may authorize a person to conduct business on their behalf,
- **Retailers** who are operating within the EPCOR Distribution and Transmission service area are referred to as “retailer” within this procedure,
- **Self contained meter** – typically a residential meter where the service has a maximum rating of 200 amps and the current rating of the meter is 200 amps or 100 amps.
- **Transformer rated meter** – typically a commercial meter where the service is rated at greater than 200 amps and the meter has a current rating of 20 amps or less and requires external voltage and current transformers. *These meters are identified in EDTI’s Utility Information System when the 4<sup>th</sup> digit of the meter number is a one.*
- See “Frequently Asked Questions” in Annex A.

### 1.6 Responsibility

#### Device Owners & Device Users

- remain responsible for the accuracy of their test equipment used for the purpose of measurement investigation. As per MC; “In order to satisfy this requirement, they should ensure that their devices are tested and calibrated on a regular basis based on usage, operating environment, etc.” EDTI Meter Operations shall ensure certification or annual functional / calibration checks are performed and records maintained.

#### EPCOR Wholesale Energy

- upon receipt of a purchaser’s / retailer’s complaint, is responsible for performing a case review and further planning and implementing the meter complaint/dispute investigation process as defined within this document. *Under no circumstances can the purchaser, their retailer or agent be informed on the state of a meter prior to evaluation and testing, nor can they be informed where there is a finding of concern that no other error exists at any point in the investigation.*
- is the business section having the responsibility of informing retailers within EDTI’s territory on relevant information associated with EDTI’s meter dispute investigation Procedure and ensuring EDTI’s policy is understood.
- is responsible for obtaining approval with the Alberta Utilities Commission (AUC) on miscellaneous service fees charged by EDTI in a meter dispute investigation. Reference Annex A-6.



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### Meter Clerks

- are responsible for communicating information to and from Meter Operations and Wholesale Energy as defined within this document,

The Meter Clerks are **not** responsible for:

- addressing details of a purchaser's meter complaint,
- discussing EDTI's dispute investigation process with a purchaser or representative,
- handling requests from retailers or other EPCOR Energy Services departments such as Credit or Enrollment on meter complaints.

*Such inquiries or correspondence shall be redirected as per Part I, 1.0 a - Contact Information or where e-mail inquiries are received, forward to EPCOR Wholesale Energy [retcomm@epcor.ca](mailto:retcomm@epcor.ca)*

### Meter Installer II

- a qualified employee whose responsibilities include performing site inspections and measurement investigation on transformer rated in-service meters as documented in this procedure,

### Meter Verifier

- a qualified Meter Technician whose responsibilities include performing meter testing as documented in this procedure.

### Measurement Canada Conditional Requirements

- **Self contained meters** may be tested by EDTI,
  - if the purchaser, their retailer or agent has not contacted Measurement Canada,
  - if the purchaser, their retailer or agent contacted Measurement Canada and Measurement Canada authorized EDTI to test the meter,
- **Transformer rated meters may be in situ** (in place) **tested** by EDTI,
  - if the purchaser, their retailer or agent has not contacted Measurement Canada. The site shall not be disturbed nor the meter removed from the site,
  - if the purchaser, their retailer or agent contacted Measurement Canada and Measurement Canada authorized EDTI to test the meters.

*Under **no** circumstances can the purchaser, their retailer or agent be informed on the state of a meter prior to evaluation and testing, nor can they be informed where there is a finding of concern that no other error exists at any point in the investigation.*

*Under **no** circumstances can EDTI remove the seal on a meter where the purchaser/retailer has raised a complaint or when a device is under measurement investigation as established within this procedure.*

*When a purchaser, their retailer, agent or Measurement Canada contacts EDTI on a meter complaint, such meters may be site inspected and or retrieved for testing as stated within this procedure and shall remain in quarantine for 90 days after closure of the purchaser's complaint/investigation or as per Measurement Canada request.*



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# Complaint Investigation Procedure

## Part II

### 2.0 Documenting the Purchaser's Electricity Meter Complaint

The purchaser's retailer or EPCOR Wholesale Energy is the first line of communication with the purchaser who documents the purchaser's meter concern and site details.

- Documenting the purchaser's meter complaint
  - Purchaser's name,
  - Requestor's name, *if other than above (may require an authorization form if acting on behalf of the purchaser)*
  - Retailer's contact information, such as phone number and e-mail address,
  - Purchaser's date of communication with Utility,
  - Purchaser's meter complaint requested by:
    - owner
    - tenant
  - Service type
    - electricity
  - Purchaser's daytime phone number or other means of contact,
    - home
    - business
  - Site ID,
  - Mailing address,
  - Postal code,
  - Service location if different,
  - Reasons for purchaser's dissatisfaction,
  - Period in question,
  - Document where discussion is held on situations leading to high energy,
  - EPCOR meter number

### 2.1 On Receipt of the Purchaser's Concern (The Retailer and or Wholesale Energy)

#### Introduction

On receipt of a purchaser's complaint relating to the condition or performance of a meter or amount of charge related to the service (energy usage), the retailer and or Wholesale Energy attempts to prevent unnecessary investigations through evaluation of reasons for the complaint, while respecting the purchaser's right to request an investigation. No further investigative action is necessary when the purchaser's concern is resolved at this level and within **two business days of receipt**.



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- The approach on a purchaser's meter complaint should be to initially discuss reasons for unusually high usage. E.g. Changes in the household, seasonal changes, phantom loads, wrong meter read, demand billing (commercial meters),  
*Reference Annex A-1*
- The purchaser may be informed:  
Electricity meters are very accurate and are required under Measurement Canada legislation to be inspected prior to being first used in trade and as legislated thereafter,

### The Retailer

**On receipt of a purchaser's meter complaint**, the retailer as per their individual process would evaluate the reasons for the complaint and likely perform a review the purchaser's billing history for the period in question. When there is no resolution within **two business days** of receipt, the meter complaint shall be communicated without delay to Wholesale Energy at [www.retcomm@epcor.ca](mailto:www.retcomm@epcor.ca),

### Wholesale Energy

**On receipt of a purchaser's meter complaint**, Wholesale Energy performs a comprehensive review of records relevant to the complaint. The review includes meter readings and Distribution & Transmission tariff charges. Actual reads may be sent to the purchaser upon a signed consent form. If a consumption error is found that accounts for the purchaser's dissatisfaction, the findings are discussed and closure to the investigation is proposed. No further action is necessary when the purchaser's concern is resolved at this level and within two business days of receipt.

Reference Annex A-7, A-8

**If unable to resolve the complaint within two business days of receipt, preservation of the site meter is required without delay.**

Reference Section 2.2

## 2.2 Classifying the Meter Complaint & Tag Process

- Where Wholesale Energy is in receipt of a purchaser's meter complaint and the concern extends beyond **two business days** of receipt, **preservation of the site meter is required without delay** and a request to tag the in-service meter is issued,
- Wholesale Energy sends a high priority e-mail to \*Meter Clerks, requesting the site to be tagged and indicates the type of investigation as an:
  - EPCOR Meter Dispute,
  - or
  - Measurement Canada Meter Dispute



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*In classifying a purchaser's complaint as an EPCOR Meter Dispute, the purchaser, their retailer or agent must **not** have contacted Measurement Canada. If at any time Measurement Canada is contacted, the potential or actual dispute is considered a Measurement Canada Meter Dispute and ongoing activities are coordinated by Measurement Canada. **Where reclassification is required, Wholesale Energy shall provide notification to \*Meter Clerks.***

- EDTI Meter Clerks log information in the Meter Operations Meter Dispute SharePoint file and issue a system order to have a Dispute Meter Tag applied at the in-service location, typically the next business day. The STARS information system is also updated in this process.  
*Reference Annex A-2*
- EDTI Meter Clerks create a work order for tracking EDTI incurred costs associated with each meter dispute investigation. The order number is entered on SharePoint in the Meter Dispute Log and Work Order log.

### 2.3 Planning & Implementing a Meter Dispute Investigation

Select the applicable “Complaint Investigation” process – 1) EPCOR or 2) MC

#### 1) Complaint Investigation Documented as an EPCOR Meter Dispute

##### **Self Contained & Transformer Rated Meters**

- Purchaser meter complaints in EDTI territory flow through the retailer to the following Business Sections:
  - EPCOR Wholesale Energy,
  - EDTI Meter Operations,
    - Meter Clerks
    - QA Administrator & QA Technician
    - Foreman – Commercial and Residential Metering
    - Meter Technicians
    - Meter Installers
- When there is no resolution to a purchaser's meter complaint through review of meter readings and D & T tariff charges relevant to the case, Wholesale Energy informs the purchaser of their investigative rights and of EDTI's meter dispute investigation process, including service fees and added costs that may be incurred. The purchaser has the right to request a meter test at an accredited test facility other than EDTI.

##### **Investigative Rights**

**EPCOR endeavours to resolve your concern and if the reasons for your dissatisfaction are not settled, Measurement Canada's services may be requested by visiting Measurement Canada's website @ [www.mc.ic.gc.ca](http://www.mc.ic.gc.ca) (Select “Complaint Investigations”)**





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### In a meter dispute investigation the purchaser may request:

- their meter tested (measurement investigation),
- and or
- on qualifying sites a site inspection .

*Note:* Self-contained meters (typically residential meters) are tested at an accredited test facility,

Transformer rated meters (typically commercial meters) are field inspection tested only, unless authorized otherwise by Measurement Canada.

**Wholesale Energy shall inform the purchaser that a steady state load is required during the meter test and they may be required to increase their energy usage in order to accommodate the evaluation on the meter,**

Site inspections may be requested on self contained meter sites only. The meter may be removed from the in-service location and is generally not tested unless requested by the purchaser. The primary purpose of a site inspection is to confirm the correct billing meter.

*Reference Annex A-3, A-4, A-5, A-6*

- **In planning a meter test and or site inspection (self contained meter only),** EDTI shall have documented evidence of the purchaser's acceptance of EDTI service fees and where the purchaser requests the services of a service provider other than EPCOR, accepts that organization's fee charged regardless of the outcome on measurement investigation. EDTI and or Measurement Canada cannot proceed on a meter dispute investigation without the purchaser's consent on service fees.

*Reference Annex A-3, A-4, A-5, A-6*

### Select the Applicable Option (A, B, C)

- **A) Where the caller requests an EDTI test facility Meter Test**  
(Limited to self-contained meters)
  - **EPCOR Wholesale Energy** plans, schedules and sends an e-mail to the **Meter Clerks (\*Meter Clerks)** stating;
    - an EPCOR meter dispute,
    - a request for an EDTI facility meter test,
    - a proposed test date and time within EDTI's service hours of 9:30 – 10:30 or 1:00 – 2:30,
    - witness preference (where applicable),



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- the name of the party witnessing the test (where applicable).
- **Meter Clerks** inform the QA Administrator or QA Technician of;
  - the EPCOR meter dispute request for a meter test,
  - the date and time,
  - witness preference,
  - the name of the party witnessing the test (where applicable).
- **Meter Clerks** e-mail acceptance of the date and time to EPCOR Wholesale Energy ([retcomm@epcor.ca](mailto:retcomm@epcor.ca)),
- **Meter Clerks** create a change meter order to retrieve the dispute meter, complete with “Meter Dispute” tag,
- The **Administrator or Technician** inform Shipping & Receiving personnel of the dispute meter and on retrieval apply a “Hold Tag” as per QA process,
- The **Meter Technician** completes the meter test as per established practice and documents the results using the applicable process form,  
*Reference: Annex A-3 and FAQ section on limits of error Form: Attachment #1*
- Upon completion of the meter test and review of the meter dispute report, the **QA Administrator** forwards a copy of the e-file stored on the “O”-drive to EDTI Meter Clerks,
- **Wholesale Energy** accesses the e-filed report and includes the “Inspection Summary” in their closing document. Meter dispute tolerances are based on MC’s P-EG-01 procedure,
- For measurement investigations that are “**Not Founded**” (not upheld) the purchaser is responsible for EDTI incurred costs.  
*Reference: Annex A-6.*

**Note: The purchaser is responsible for all service fees associated with the meter test when no apparent error, non-conformity or defect exists. The test is performed at EDTI’s accredited test facility unless the purchaser requests otherwise.**



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- **B) Where the caller requests an EDTI field Meter Test**  
(Limited to transformer rated sites)

*On a transformer rated installation, the site including the meter must not be disturbed without authorization from Measurement Canada, unless there exists a safety concern.*

- **EPCOR Wholesale Energy** plans, schedules and sends an e-mail to the **Meter Clerks (\*Meter Clerks)** stating;
  - an EPCOR meter dispute,
  - a request for a field meter test,
  - a proposed test date and time within EDTI's service hours of 9:30 – 10:30 or 1:00 – 2:30,
  - witness preference (where applicable),
  - the name of the party witnessing the test (where applicable).
- **Meter Clerks:**
  - inform the Foreman Commercial Metering and acquire confirmation the test date is satisfactory,
  - e-mail acceptance of the date and time to EPCOR Wholesale Energy ([retcomm@epcor.ca](mailto:retcomm@epcor.ca)),
  - create a “CHK CHK” system order to have a field meter test performed by a qualified Meter Installer II.
- The **Meter Installer II** completes the meter test and installation inspection as per established practice and documents the results using the applicable process form, *Reference: Annex A-4 and FAQ section on limits of error Form: Attachment # 2*
- Upon completion of the meter test and inspection, the **Meter Installer** submits the Meter Dispute Report to the QA Administrator for review and e-filing (“O”-drive). A copy of the report is forwarded to EDTI Meter Clerks,
- **Wholesale Energy** accesses the e-filed report and includes the “Inspection Summary” in their closing document. Meter dispute tolerances are based on MC's P-EG-01 procedure,
- For measurement investigations that are **Not Founded** (not upheld) the purchaser is responsible for EDTI incurred costs.  
*Reference: Annex A-6.*



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**Note: The purchaser is responsible for all service fees associated with the meter test and inspection when no apparent error, non-conformity or defect exists. Where Measurement Canada is involved, service fees are not duplicated.**

**If a deficiency is observed, Wholesale Energy shall contact Measurement Canada who further coordinates the investigation. The site shall not be disturbed in any way, (Go to Section 2.3.2B)**

- **C) Where the caller requests an EDTI Site Inspection**  
(Inspection limited to self-contained meter sites - no field meter test)
  - **EPCOR Wholesale Energy** plans, schedules and sends an email to the **Meter Clerks (\*Meter Clerks)** stating;
    - an EPCOR meter dispute,
    - a request for a site inspection,
    - a proposed site inspection date and time within EDTI's service hours of 9:30 – 10:30 or 1:00 – 2:30,
    - witness preference (where applicable),
    - the name of the party witnessing the inspection and providing access to the dwelling, (where applicable)
  - **Meter Clerks:**
    - inform the Foreman Residential Metering and acquire confirmation the inspection date is satisfactory,
    - e-mail acceptance of the date and time to EPCOR Wholesale Energy ([retcomm@epcor.ca](mailto:retcomm@epcor.ca)),
    - create a “CHK CHK” system order to have the site inspection performed by a Meter Installer.
  - The **Meter Installer** completes the site inspection as per established practice and documents the results using the applicable form. *Reference: Attachment # 3*
  - Upon completion of an EDTI site inspection, the **Meter Installer** submits the report to the QA Administrator for review and e-filing (“O”-drive). A copy of the report is forwarded to EDTI Meter Clerks,



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- **Wholesale Energy** accesses the e-file report and includes the “Inspection Summary” in their closing document.

**Note:** The purchaser is responsible for service costs associated with an EDTI site inspection when there is no finding of concern and in cases where there is conclusive evidence of site tampering. On “EPCOR” designated meter dispute investigations, in-service meters are replaced when the site I.D. and associated meter are found to be incorrectly identified (crossed meters) and or there is physical damage to the meter or the meter is non-compliant. *Where a second meter is removed from in-service use the device shall be identified with a Meter Dispute tag (crossed meter).*

Where the purchaser requests a meter test in addition to the site inspection, the purchaser’s consent on EDTI service fees must be acquired and the activity shall be scheduled, witness preference determined and etc. The purchaser is responsible for all service fees associated with the meter test when no apparent error, non-conformity or defect exists. The test is performed at EDTI’s accredited test facility unless the purchaser requests otherwise.

**On Measurement Canada investigations, unless a safety concern exists the meter site shall not be disturbed unless authorized.**

- 
- Where service fees are incurred in a purchaser’s meter dispute investigation, the **QA Administrator** prepares and submits a final cost report to **EDTI Meter Clerks**, who apply a site charge appropriate to the level of service provided, *Reference: Annex A-6 for details.*
  - **Wholesale Energy** in preparing a final report, communicates the finding particulars to the purchaser and their retailer, proposes closure on the case file and e-mails the closing date (settlement date) to \*Meter Clerks. Where EDTI performs measurement investigation, the findings noted in the “**Inspection Summary**” are communicated in the final report released to purchaser and the retailer. *Limits of error are based on Measurement Canada’s meter dispute tolerances shown in the FAQ Section, Reference Annex A-6, A-7, A-8, A-9,*
  - **EDTI Meter Clerks** file the correspondence, update the Meter Operations Meter Dispute SharePoint file and where a meter is retrieved from the in-service location inform the QA Administrator or QA Technician of the closing date on the investigation,
  - Where a dispute meter remains tagged at the in-service location, EDTI Meter Clerks issue a CHK CHK order to retrieve the tag upon expiry of the meter quarantine period. *Reference Annex A-10*



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### 2) Complaint Investigations Involving Measurement Canada

- Where the purchaser, their retailer or agent contacts Measurement Canada, the potential or actual dispute shall be considered a Measurement Canada meter dispute,
- **Unless authorized to do so**, EDTI shall not remove the meter from the site or further perform any tests or inspection on any meter or site that has become the subject of a Measurement Canada dispute investigation.

#### Select A) or B) as applicable

##### A) Purchaser's Request via Measurement Canada's Office

- Measurement Canada may ask the purchaser to contact their retailer, if not done so and instruct them to call back if there is no resolution to their meter complaint. Where Measurement Canada involvement escalates beyond that of the retailer, correspondence is directed to **Wholesale Energy**,  
*Contact Information: Reference Part 1, 1.0 b*
- On official Measurement Canada meter dispute investigations, Measurement Canada issues a "Notice of Measurement Dispute Investigations" case form or equivalent documentation in electronic form, informs Wholesale Energy of information needed and coordinates all ongoing activities.

##### **The Administrative Review**

- Wholesale Energy may be requested to first examine and submit consumption records that are relevant to the investigation in an attempt to further prevent unnecessary activities. A comprehensive review of the purchaser's meter readings and Distribution & Transmission tariff charges is performed. If the purchaser's meter complaint exceeds **two business days**, preservation of the site meter is required.  
*Reference: Section 2.2 for additional details*

##### **Planning Measurement Investigation**

- Where there is no administrative resolution, Measurement Canada effectively plans the next stage of the investigation, namely the meter test (measurement investigation),
- Measurement Canada shall be informed of EDTI's service fees and under what circumstances. Measurement Canada may request Wholesale Energy discuss the details with the purchaser. Without the purchaser's consent on EDTI's service fees neither EDTI nor Measurement Canada can proceed,  
*(Reference Annex A-6)*



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- Where consent is obtained on EDTI's service fees Measurement Canada schedules a **meter site test or test facility meter test**. Wholesale Energy is generally the party that informs the site retailer of the meter dispute,
  - **EPCOR Wholesale Energy** e-mails the details to EDTI **Meter Clerks (\*Meter Clerks)** stating;
    - a Measurement Canada meter dispute,
    - a request for an EDTI facility meter test **or** field meter test,
    - a proposed test date and time within EDTI's service hours of 9:30 – 10:30 or 1:00 – 2:30,
    - witness preference (where applicable),
    - the name of the party witnessing the test (where applicable).
  - When a **test facility meter test** is scheduled,
    - **EDTI Meter Clerks** inform the QA Administrator or QA Technician of;
      - the Measurement Canada meter dispute request for a meter test,
      - the date and time,
      - witness preference,
      - the name of the party witnessing the test (where applicable).
    - **Meter Clerks** e-mail acceptance of the date and time to EPCOR Wholesale Energy ([retcomm@epcor.ca](mailto:retcomm@epcor.ca)),
    - **Meter Clerks** create a change meter order to retrieve the dispute meter, complete with "Meter Dispute" tag,
    - The **Administrator or Technician** inform Shipping & Receiving personnel of the dispute meter and on retrieval apply a "Hold Tag" as per QA process,

*Testing is performed at EDTI's accredited test facility unless the purchaser requests otherwise. If requested elsewhere, additional costs are incurred regardless of the outcome of the meter test,*



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- Where a **field meter test** is scheduled EDTI **Meter Clerks**;
  - inform the Foreman Commercial Metering and acquire confirmation the test date is satisfactory,
  - e-mail acceptance of the date and time to EPCOR Wholesale Energy ([retcomm@epcor.ca](mailto:retcomm@epcor.ca)),
  - create a “CHK CHK” system order to have a qualified Meter Installer II accompany Measurement Canada.

### Measurement Investigation

- EDTI provides assistance to Measurement Canada in performing field meter inspections and meter testing at EDTI’s Test Facility. Site testing may involve load analysis and evaluation of all components of the metering system.

### Communication of Findings

- Measurement Canada informs Wholesale Energy of the findings following testing and analysis,
- Wholesale Energy e-mails the outcome of measurement investigation to \*Meter Clerks,
- When analysis of the measurement investigation shows no apparent error, non-conformity or defect, the **QA Administrator** prepares and submits to **EDTI Meter Clerks** a final cost report of service fees incurred. **EDTI Meter Clerks** apply a site charge appropriate to the level of service provided. *When no apparent error, non-conformity or defect exists, the purchaser is responsible for all service fees associated with a meter test and installation inspection when performed,*  
*Reference Annex A-6*
- **Measurement Canada** in preparing a final report, communicates the finding particulars to all interested parties and proposes closure on the case file. Wholesale Energy is informed of the closure date and e-mails the settlement date to \*Meter Clerks,
- **EDTI Meter Clerks** file the correspondence, update the Meter Operations Meter Dispute SharePoint file and where a meter is retrieved from the in-service location inform the QA Administrator or QA Technician of the closing date on the investigation.

### Follow-up Activity

- Where a dispute meter remains tagged at the in-service location, **EDTI Meter Clerks** issue a system “CHK CHK” order to retrieve the tag upon expiry of the meter quarantine period.  
*Reference Annex A-10*





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### B) Purchaser's Request via EPCOR's Office

- If all efforts to resolve the purchaser's meter complaint/dispute investigation fail, the purchaser, their retailer or agent may register a complaint with Measurement Canada and request they investigate the matter.

*Measurement Canada's website: [www.mc.ic.gc.ca](http://www.mc.ic.gc.ca) - Select "Complaint Investigations"*

Where dissatisfaction with the findings is expressed within 30 days of notice as specified in Annex A-9, Wholesale Energy shall refer the matter to Measurement Canada's Regional Office in Winnipeg. Measurement Canada secures all available information needed for review of the investigation.

*Reference: Part I, 1.0 c*

or

- where inspection and testing is performed on a transformer rated site as per Section 2.3.1 and deficiencies are observed, Measurement Canada's Regional Office in Winnipeg shall be contacted and information provided as requested. In such cases, Measurement Canada would schedule measurement investigation as per the process in Section 2.3.2A – "Planning Measurement Investigation".
- Measurement Canada communicates any new conclusions and recommended actions to all interested parties.

*Where Measurement Canada is contacted, Wholesale Energy shall notify the Meter Clerks (\*Meter Clerks) to change the dispute (documented on SharePoint) from "EPCOR" to a "Measurement Canada" Meter Dispute.*

### **Wholesale Energy in correspondence with Measurement Canada provides all relevant records and information:**

- The reason for the request,
  - utility interpretation of the purchaser's dissatisfaction,
- The requestors,
  - name of the purchaser, representative and agent that initiated the meter complaint,
    - daytime contact number,
    - mailing address,
  - Retailer name, address and contact information,
  - Utility name, address and contact information,
- Purchaser's initial date of communication with the utility,
- Meter identification,
  - utility meter number,



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- meter type
    - self contained or transformer rated,
- Period in question,
- D & T Billing data,
  - purchaser's name (*if different than above*),
  - site ID,
  - address - mailing(*if different than above*) & service address *if different*,
  - applicable rate schedules,
  - install date and meter readings,
  - billing determinants,
  - meter readings, (*Where billing amounts in units and dollars for each billing period are required, Measurement Canada would contact the retailer*),
  - particulars of any recent (manual or one time charges) billing adjustments,
  - explanation of codes and charges,
  - other pertinent information needed as requested Measurement Canada,
- Explanation of dispute charges applied & under what circumstances,
- Summary of efforts to resolve the purchaser's complaint,
  - including summary of communication with the purchaser,
  - list of information provided to the purchaser,
  - results of examination of energy and Distribution & Transmission charge records,
  - tests and other tasks performed and results,
  - results of any metering installation examination,

Measurement Canada may request completion of a Statement of Complaint Load Survey. The questionnaire is generally completed by the purchaser and is available on Measurement Canada's website @ [www.mc.ic.gc.ca](http://www.mc.ic.gc.ca) (*Services/Complaint Investigations*).

- Statement of Complaint Load Survey (30 days) - *exhibit Attachment # 6*

or

- Statement of Complaint Load Survey (60 days) - *exhibit Attachment # 7*



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### ANNEX A

#### 1) Situations Leading to Unusually High Consumption

##### Reasons for changes in consumption

- If comparing energy consumption from the previous year and month,
  - there can be differences in temperature that influence energy usage,
  - your energy usage may cover a greater number of days,
  - distributor rates may have increased,
  - an administrative error may have occurred, such as a meter misread. In such cases it is likely the energy consumption error would be corrected and compensated by your Retailer on the next billing file.

##### Seasonal changes (typically residential customers)

- During the winter energy usage will likely increase due to:
  - increased lighting,
  - increased usage of your furnace,
  - use of a vehicle block heater,
  - use of a portable space heater,
  - increased demand from a hot tub,
  - increased demand from electric baseboard heating,
  - use of electric heat tape if applicable,
  - increased demand from an electric hot water system and etc.,
- During the summer increased energy usage may be due to:
  - air conditioning,
  - inefficient weather stripping or insulation qualities of a fridge or freezer. Frost build-up on freezers for example may also increase the run time.

##### Changes in the household (typically residential customers)

- If the number of people in a household has increased, it is likely there is increased laundry usage,
- If the number of appliances or TV's in a household has increased, it is likely there is increased energy usage,
- Are you renovating, as power tool usage may increase energy usage?

##### Phantom loads (typically residential customers)

- Many appliances and devices consume standby power when the device is not used or powered off. The power consumed is generally small in the off or standby state, but can be significant when considering all devices. Examples of such devices are:
  - clock radios,
  - vcr / dvd players,
  - audio receivers,
  - TVs,
  - cable & satellite set top boxes,
  - computers,
  - monitors,
  - printers,



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- telephone answering systems and remote units,
- air conditioner (electronic controlled),
- portable fans (electronic controlled),
- dehumidifier (electronic controlled),
- timers of all types,
- washer & dryer (electronic controlled),
- range - cook top (clock/electronic controls),
- microwave (clock/electronic controls),
- dishwasher (electronic controlled),
- video gaming systems,
- lighting sensors,
- portable low voltage lighting,
- central vacuum (low voltage transformer),
- furnace (low voltage transformer),
- security monitoring system,
- on demand hot water dispenser,
- water cooler (electronic controlled/ standby operation),
- garage door operator (low voltage transformer),
- battery chargers - continuously plugged in,
- ground fault - plugs and service panel breakers
- arc fault service panel breakers
- and etc,

Buying energy star devices may reduce operating costs and standby energy usage,

### Customers on Demand Metering (Billing on Demand)

- Electricity meters capable of demand metering are generally installed at commercial sites.

The utility uses the maximum average power load over an interval of time as the basis in billing. Utility companies in part base the infrastructure needs for generation and distribution systems on demand metering.

## 2) Meter Preservation (Tagging of the Meter)

- Meter Dispute weatherproof tags are available from the Meter Operations Store. The tags identify either an EPCOR Meter Dispute or Measurement Canada Meter Dispute. Text box information shall be completed and the tag initialed using an indelible marker.

*Reference: Attachment # 5*

## 3) Self-contained Meter Test - EDTI Test Facility

- Where the purchaser requests their meter tested they must consent to EDTI's service fees prior to EDTI performing the activity,
- EDTI accommodates as reasonably practical the purchaser's **witness preference**. If an agreement on a mutually convenient date and time cannot be reached, a time and date is set as per established service standards. Where a meter test is witnessed by the purchaser or their representative, they shall be informed of any safety concerns,



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The meter test confirms functionality requirements of the meter and accuracy of the device as per established dispute tolerances prescribed by Measurement Canada. A creep test and where applicable dial test, association test and power outage test are performed. For a zero load test (creep test), the disc shall not exhibit one complete revolution in 10 minutes. In meter dispute investigations, meters without a rotating disc shall not exhibit more than 10Wh in less than 10 minutes, (*Reference: S-E-02 & P-EG-01*)

- A trained Meter Verifier conducts the required meter performance and conformance tests in accordance with established procedures and practices. Measurement Canada certified test consoles are used in this process,
- **Under no circumstances** can EDTI remove the seal on a meter associated with a purchaser's meter complaint under dispute investigation,
- As per P-EG-01, additional energy tests are conducted at 70% and 35% of full load series tests,
- The Meter Technician completes the "Meter Dispute Report (EDTI Meter Test Facility)" and e-files the document on the "O"-drive for QA Administrator review.

*Reference: Attachment # 1*

#### 4) EDTI Transformer rated Meter Test

- Where the purchaser requests their meter tested they must consent to EDTI's service fees prior to EDTI performing the activity,
- EDTI accommodates as reasonably practical the purchaser's **witness preference**. If an agreement on a mutually convenient date and time cannot be reached, a time and date is set as per established service standards. Where a meter test is witnessed by the purchaser or their representative, they shall be informed of any safety concerns,
- A trained Meter Installer II conducts the required field meter test in accordance with established procedures and practices,
- A **transformer rated meter site** shall not be disturbed nor the meter removed from the site without Measurement Canada authorization, unless there exists a safety concern,

**Under no circumstances** can EDTI remove the seal on a meter associated with a purchaser's meter complaint under dispute investigation,

- A **transformer rated meter** is in situ (*in place*) tested at a steady state load. The purchaser may be required to temporarily increase their energy usage in order to accommodate the analysis test that determines functionality and accuracy of the meter. The inspection also includes a review of CTs, PTs, associated wiring and where applicable a telemetering check,
- The Meter Installer completes the "Meter Dispute Report (Transformer Rated Site Inspection Test Sheet)" in full and submits the document to the QA Administrator for review and e-filing. *Reference: Attachment # 2*



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### 5) EDTI Site Test - self contained field meter (no field meter test)

- Where the purchaser requests a site inspection they must consent to EDTI's service fees prior to EDTI performing the activity,
- EDTI accommodates as reasonably practical the purchaser's **witness preference**. If an agreement on a mutually convenient date and time cannot be reached, a time and date is set as per established service standards. Where a site inspection is witnessed by the purchaser or their representative they shall be informed of any safety concerns,
- Prior to the Meter Installer performing the inspection, the purchaser or their representative should be informed there will be an interruption in the service. Inspection includes an evaluation of the service and meter condition, and zero load breaker test. A breaker test confirms the correct billing meter. Where applicable a telemetering check is performed.
- The Meter Installer completes the "Site Inspection Report" in full and submits the document to the QA Administrator for review and e-filing,  
*Reference: Attachment # 3*

**On "EPCOR" designated meter dispute investigations, in-service meters are replaced when the site I.D. and associated meter are found to be incorrectly identified (crossed meters) and or there is physical damage to the meter or the meter is non-compliant. Where a second meter is removed from in-service use the device shall be identified with a Meter Dispute tag (crossed meter). Unless a safety concern exists, on Measurement Canada investigations the meter site shall not be disturbed unless authorized.**

### 6) EDTI Service Fees

- EDTI service fees are approved by the AUC in EDTI's Distribution Access System as miscellaneous service fees,
- Where the purchaser requests their meter tested and or an EDTI site inspection (self contained meter only), they must consent to EDTI's service fees prior to EDTI performing the activity,
- Following completion of investigative activities, the QA Administrator prepares a final cost report of EDTI incurred costs. The report is e-filed on the "O"-drive and a copy forwarded to EDTI Meter Clerks,
- EDTI Meter Clerks process actual costs incurred in a purchaser's meter dispute investigation as follows:
  - No EDTI service fees are charged on a comprehensive review of the purchaser's meter readings and Distribution & Transmission Tariff charges, regardless of the outcome,
  - On **EDTI meter dispute investigations**, no service fees are charged for a single occurrence meter test performed by EDTI when an error or finding of concern is discovered,



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- Where there is no apparent error or finding of concern on a meter test, EDTI service fees apply,
- Where an EDTI site inspection is performed, EDTI service fees apply when there is no finding of concern and in cases where there is conclusive evidence of site tampering.  
(Inspection limited to self contained meter sites - no meter test)
- Where the purchaser requests the services of an organization other than EPCOR, the purchaser is responsible for incurred costs,
- Service fees charged flow through the Tariff Bill File to the purchaser at the time of completion of measurement investigation and on completion of a site inspection. *This is through STARS Ad hoc request (one time charge as approved by the AUC),*
- For **Measurement Canada meter dispute investigations**; where EDTI and Measurement Canada perform the same field test or test at EDTI's test facility, a one time EDTI service fee applies when no apparent error or finding of concern is found during measurement investigation.

### EDTI's Meter Dispute Investigation Service Fees

#### Self contained meter test at EDTI's Test Facility

- actual costs incurred,
- Install site preservation tag,
  - Meter retrieval,
  - Meter test at EDTI's Test Facility and analysis report.

#### Transformer rated field meter test performed by EDTI

- actual costs incurred,
- Install site preservation tag,
  - Meter test, CT & PT inspection and analysis report,
  - Retrieval of quarantine tag.

#### EDTI Site Inspection – limited to a self contained meter (no field meter test)

- actual costs incurred,
- Install site preservation tag,
  - Site inspection and report.
- optional meter test, actual costs incurred,
- Meter test at EDTI's Test Facility and analysis report.

#### Meter test at an accredited facility other than EDTI

- actual costs incurred.



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### 7) Communication of Findings (EPCOR Meter Dispute Investigations)

Where EPCOR Wholesale Energy in is receipt of a purchaser's meter complaint, Wholesale Energy prepares and communicates the final report to the purchaser and their retailer by addressing:

- the enquires made,
- if the purchaser was present or represented,
- the examination of records that are relevant to the matter,
  - application of wrong rate structure,
  - application of wrong formulas,
  - wrong meter reading,
  - error in the use of the multiplier,
  - use of estimating method that results in excessive billing fluctuations,
- where measurement investigation is performed by EDTI, findings are noted in the "Inspection Summary" of the Meter Dispute Report. *The limits of error are based on Measurement Canada's meter dispute tolerances shown in the FAQ Section,*
- *where a site inspection is performed by EDTI, findings are noted in the "Inspection Summary" of the site inspection report,*
- an "adjustment period" where a consumption error is considered to have existed, *Reference T-8 Adjustment Period in Measurement Canada's Electricity and Gas Measurement Dispute Investigation Procedure P-EG-01. EDTI's Terms and Conditions and AUC Rule 21 and AUC004 shall comply with T-8 requirements.*
- a dispute rating of **Founded** or **Not Founded**.

### 8) Closure of Investigation (EPCOR Meter Dispute Investigations)

Where EPCOR Wholesale Energy in is receipt of a purchaser's meter complaint, **Wholesale Energy** in preparing a final report communicates the finding particulars to the purchaser and their retailer, proposes closure on the case file and e-mails the closing date (settlement date) to \* Meter Clerks. When a meter test or site inspection is performed, observations in the "**Inspection Summary**" of the report are communicated in the final document released to purchaser and retailer. *Limits of error are based on Measurement Canada's meter dispute tolerances shown in the FAQ Section,*

A purchaser's meter complaint can be **closed**:

- if a consumption error is discovered that likely accounts for the purchaser's dissatisfaction and the findings have been discussed with all interested parties,
- when the case file is inactive as per established policy, in that Wholesale Energy is unable to reach the purchaser and there is no call





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back. In such cases the dispute meter shall be quarantined for 90 days following the closure date. *Upon the purchaser contacting Wholesale Energy within the quarantine period the investigation may be re-opened.*

Where the purchaser requested their meter tested and or a site inspection and consented to EDTI's service fees; the meter dispute investigation can be **closed**:

- when there is no apparent consumption error or non-conformity in findings that accounts for the purchaser's dissatisfaction,
- if there is an apparent non-conformity in findings that accounted for the purchaser's dissatisfaction,

A purchaser's concern on a meter complaint can be **terminated**:

when analysis of provided information indicates that the usage is likely representative of the purchaser's consumption and the purchaser has not agreed to EDTI's service fees associated with measurement investigation.

### 9) Findings Contested

#### Addressing Client Feedback

- Where the purchaser is provided with the reported findings of the meter dispute and gives notice to Wholesale Energy within the prescribed time that he is dissatisfied with the findings, Wholesale Energy shall refer the matter to Measurement Canada for consideration (*Reference Part I, 1.0c - Contact Information*). The notice shall state in writing the reason or reasons for dissatisfaction of the findings,
- The time in which a purchaser may give notice to Wholesale Energy is 30 days after the date that the findings referred to in the investigation was provided to that person.

### 10) Tag Removal

- Where applicable and upon expiry of the quarantine period (*90 days following the closure date or as per Measurement Canada*), EDTI Meter Clerks issue a system order to retrieve the information tag from the in-service location.



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### Frequently Asked Questions

#### EDTI service fees

Where the purchaser requests a site inspection (limited to self contained meter) and or their meter tested (measurement investigation), the purchaser must consent to EDTI's service fees prior to performing the inspection. Service fees apply when there is no apparent non-conformity observed during measurement investigation. When a site inspection is performed, an EDTI service fee is charged when there is no finding of concern and in cases where there is conclusive evidence of site tampering.

*Reference: Annex A-6*

#### Limits on meter dispute tolerances (Reference: MC procedure P-EG-01)

Pursuant to section 31 of Electricity & Gas Inspections Regulations, the limits of error for the purpose of section 24 of the Act are as follows:

- **Energy:** The maximum permissible error is +/- 3.0 % of the electricity registered by the meter, and
- **Demand:** The maximum permissible error is +/- 2.5 % of the maximum point of the electricity meter's demand scale, or of the maximum rated demand of the meter, and
- **Multipliers:** No error due to meter multipliers or billing factors is allowed.

#### **Measurement Investigation**

Planning, scheduling and performing a meter test. For transformer rated meters an installation inspection is also performed,

#### Meter Inspection (Reference Annex # A- 3 & A- 4)

##### Meter Performance

Meters are highly accurate devices which are tested and sealed as per Measurement Canada specifications by accredited manufacturers and accredited service providers.

In a meter dispute investigation limits of error are based on Measurement Canada's meter dispute tolerances.

##### Meter Conformance Checks at EDTI's Test Facility

A creep test and where applicable dial test, association test and power outage test are performed.

- The **creep test** involves subjecting the meter to a zero load at the rated voltage. For mechanical meters, the disc shall be effectively stopped and for electronic meters effectively no registration. For measurement dispute investigations, meters without a rotating disc shall not exhibit more than 10Wh in less than 10 minutes. In the event of creep test failure, creep is deemed to exist for 12 hours a day during the adjustment period, unless a more exact assessment is available,



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- A **dial test** is performed on electromechanical meters. No error is permitted in the register,
- The **association test** is performed on network and polyphase meters. This test checks for proper polarity in the meter, in that each current circuit is associated with the correct voltage circuit,
- The **power outage test** is performed on electronic meters to ensure significant information is not lost in the event of a power outage.

### Attachment #1

EPCOR Meter Dispute Report (EDTI Meter Test Facility)

### Attachment #2

EPCOR Meter Dispute Report (Transformer Rated Site Inspection Test Sheet)

### Attachment #3

EDTI Site Inspection Report (Self Contained Energy Meter), Dispute Investigation

### Attachment #4

EDTI Meter Operations Guide – Customer Meter Complaint / Dispute Investigation

### Attachment #5

EPCOR meter dispute tag - *exhibit*

### Attachment #6

Measurement Canada Statement of Complaint Load Survey (30) - *exhibit*

### Attachment #7

Measurement Canada Statement of Complaint Load Survey (60) - *exhibit*

*Document modification: Section 1.2 Scope, 1.5 Terminology, 1.6 Responsibility - September 13, 2012, GB.*