

June 11, 2013

Comments Submitted Via ERF

Ms. Sandra J. Paske, Secretary to the Commission
Public Service Commission of Wisconsin
P.O. Box 7854
Madison, Wisconsin 53707-7854

RE: PSC Docket 1-AC-227 Comments

Dear Ms. Paske:

The Municipal Environmental Group - Water Division (MEG - Water) appreciates this opportunity to provide comments on the Commission's proposal to revise parts of chs. PSC 113, 134, and 185 that deal with the retention of meters. MEG - Water is an association of 58 municipal water utilities who have joined together to provide input on proposed laws and regulations that affect municipal water utilities in Wisconsin. Our comments are limited to the portion of the Commission's proposal that revises parts of PSC 185.

MEG - Water supports the meter retention requirements applicable after a customer requested test, after a referee test, when performing other tests, and when a complaint or dispute occurs.

MEG - Water does not support the new requirement in PSC 185.77(3)(e) that requires a utility to test or retain all meters that have been retired. The proposed addition -- PSC 185.77(3)(e) -- provides that:

When a utility retires a meter from service and test results indicate that no back bill or credit is due a customer, the utility may dispose of the meter immediately. When a utility retires a meter from service without testing it, the utility shall keep the meter, in "as found" condition, at a designated location on the utility's premises for at least one full billing cycle plus 4 weeks after the date on which the meter is retired so that the meter is available should another meter test be requested.

MEG - Water members strongly feel that this new italicized language which would require a utility to test or retain all retired meters is burdensome, increases costs, will increase utility rates, and would provide no benefit to customers in most cases. The limited benefits that would be provided by this requirement do not justify the additional costs and burdens that would be imposed by this requirement.

A better -- more targeted -- approach would be to require the utility to test or retain an untested retired meter only if (i) the utility issues the customer a back bill for service provided while the retired meter was used, or (ii) the bill issued prior to the meter replacement was estimated. In

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those cases, a customer request for a meter test could be reasonably anticipated and might provide useful information to the customer. This targeted approach would only require those retired meters that meet these specified conditions to be tested or retained. This would limit a utility's costs, while providing customer protection in those situations where an issue might arise. MEG - Water believes this is a better, more cost-effective approach that focuses utility resources on those situations where meaningful benefits might be provided.

Thank you for your consideration of these comments. We would be happy to discuss any questions that you may have about them.

MUNICIPAL ENVIRONMENTAL GROUP
-- WATER DIVISION

/s/ Lawrie J. Kobza

Lawrie J. Kobza
Legal Counsel

cc: MEG - Water Members (via e-mail)

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