CHAPTER 28

Prepared Rebuttal Testimony

Of

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

SEPTEMBER 7, 2006
I. Introduction and Summary

The purpose of my testimony is to discuss SDG&E’s intention to develop a formal plan for handling access problems that may occur during AMI deployment.

II. SDG&E Intends to Submit Formal Procedures Regarding Meter Access Problems

DRA witness Marshall Enderby (Chapter 7) correctly points out that SDG&E has not yet formally provided the Commission with a detailed plan for handling meter access problems that may be encountered during installation of AMI meters. In fact, SDG&E responded to DRA’s concern in a data request response (DRA Data Request 27, question 2a) wherein SDG&E stated that it would develop formal procedures to address access problems and other deployment situations. SDG&E plans to finalize and submit these procedures to the Commission for review in first quarter of 2007.

Below is the DRA data request and SDG&E’s response:

**Question 2:** SDG&E’s reply to DRA Data Request Number 17, Q. 2, states that after three unsuccessful attempts to gain access to the gas or electric meter, the account will be returned to SDG&E for further evaluation. Moreover, SDG&E may decide to handle the problem itself or to ask the installation vendor to complete the meter installation at an incremental cost.

a) Has SDG&E established a formal procedure in the event that SDG&E chooses to handle a problem of access itself?
**SDG&E Response 2a:**

Currently, SDG&E is developing a formalized procedure for handling customers who do not make their meters accessible after three notifications. As part of this effort, SDG&E plans to meet with other utilities and installation vendors to learn from their experiences in resolving meter access problems and determine the best practices that have evolved from real life experiences. SDG&E’s goal is to develop its own “best practices” to resolve access problems while minimizing service terminations, unnecessary field visits, and create a positive experience for the customer. SDG&E will formalize a procedure to deal with access to metering equipment issues by the end of March 2007.

This concludes my prepared rebuttal testimony.