

## PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

COMMISSION ADVISORY AND  
COMPLIANCE DIVISION  
Energy Branch

RESOLUTION G-3009  
OCTOBER 6, 1992

**R E S O L U T I O N**

RESOLUTION G-3009. SOUTHWEST GAS CORPORATION REQUESTS AUTHORITY TO REVISE ITS METER REPLACEMENT PROGRAM BY DEVIATING FROM THE REQUIREMENTS OF GENERAL ORDER 58-A, PARAGRAPHS 13(a) and 16(c).

BY ADVICE LETTER 447-G, FILED ON MAY 26, 1992.

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**SUMMARY**

1. Southwest Gas Corporation (Southwest) requests authorization to deviate from the requirements of General Order (GO) 58-A, "STANDARDS FOR GAS SERVICE IN THE STATE OF CALIFORNIA", Paragraph 13. Periodic and Other Required Tests of Gas Meters, Subpart (a), and Paragraph 16 "Records of Meters and Meter Tests", Subpart (c).
2. The deviation requested from Paragraph 13 (a) is to leave meters installed in place for a maximum of twelve (12) years, instead of the mandated ten (10) years, while Southwest gathers statistical data from its various service areas in California, Nevada and Arizona to study the appropriateness of adopting a program for the statistical analysis of meter performance to determine if a class of meters should be removed from service.
3. The deviation requested from Paragraph 16 (c) is to maintain the current date and location of each meter installed instead of the complete historical record of each utility.
4. This Resolution grants the request.

**BACKGROUND**

1. GO 58-A, Paragraph 13. (a) states:

No gas meters hereafter installed shall be allowed to remain in service more than ten (10) years from the time when last tested without being retested in the manner herein provided, and if found inaccurate, each such meter shall, at the time of each test be readjusted to be correct within the prescribed limits before being installed.

2. GO 58-A, Paragraph 13. (c) states:

Under certain conditions utilities may be authorized to deviate from Section 13.a. and use a statistical meter control program based on meter performance as demonstrated by sample testing in lieu of periodic testing of each meter. Applications to deviate shall be based on accepted principles of statistical sampling.

3. Authority to deviate from the requirement of Paragraph 13 (a) of GO 58-A, based upon a statistical analysis of results of meters tested, has been granted to San Diego Gas and Electric Company (SDG&E) by Resolution (R.) G-1426 dated December 10, 1968, Pacific Gas and Electric Company (PG&E) by R. G-1324 dated June 1, 1966, and Southern California Gas Company (SCGC) by R. G-1123 dated April 28, 1960.

4. GO 58-A, Paragraph 16. (c) states:

A record shall be kept, numerically arranged by meter number, indicating for each meter owned or used by a gas utility, its type, size and date purchased, together with the dates and locations of each installation, the date and result of each test, and the date and character of all repairs made. Where, because of the large number of meters involved, or for other valid operating reasons, the utility desires to adopt other methods for meter records, it shall present such proposal in detail to this Commission for approval. When the utility adopts a different method for meter records, no duplicate system need be maintained. These records shall be retained for a period of one year after the meter is sold, dismantled or destroyed.

**NOTICE:**

1. Public notice of this filing has been made by publication in the Commission's calendar on May 29, 1992, and by mailing copies to adjacent utilities.

**PROTESTS**

1. No Protests to this Advice Letter were received by the Commission Advisory and Compliance Division (CACD).

### DISCUSSION

1. General Order 58 was originally adopted in 1919. At that date there were numerous gas utilities in California, small in size, using materials which are no longer used, and rarely having facilities to test or repair meters.

2. The displacement gas meters in use at that date used a leather diaphragm to achieve the movement to measure and record the gas usage by the customer.

3. The leather diaphragm had a relative short life span, 12 to 15 years, after which time they became too soft or cracked and split. Either situation resulted in numerous complaints by customers of the billing and charges they were required to pay.

4. This led the Railroad Commission (as this Commission was then known) to adopt the standard of 10 years as the useful life of a gas meter, with the requirement that after a meter had been in use for 10 years it was to be removed from service.

5. Approximately 40 years ago the use of plastic diaphragms, instead of leather, in gas meters became available. The plastic diaphragm meters have a longer service life before they develop problems in operation.

6. Through mergers and acquisitions the number of gas utilities in California has been significantly reduced. There are now only six gas utilities regulated by the Commission.

7. The three largest gas utilities, as mentioned above, have constructed their own facilities to test and repair gas meters, and have adopted standards for meter performance much stricter than the requirements in GO 58-A. These three large utilities as mentioned above have all received Commission approval to adopt a program of statistical analysis of gas meters. The three smaller gas utilities, Southern California Edison Company, Washington Water Power Company, and Southwest, having only a relatively small number of meters installed in California, continued to adhere to the requirements of GO-58.

8. Southwest has continued to grow in size, in the number of customers served, in California. In addition it has grown in size in the adjacent states of Nevada and Arizona. Southwest has now constructed the necessary facilities to test and repair gas meters, and has a sufficient number of meters installed that a program of statistical analysis is appropriate.


FINDINGS

1. General Order 58-A by its language authorizes a regulated utility to use a statistical analysis to determine the useful life of a gas meter, instead of the 10 year removal.
2. Allowing Southwest to leave meters installed twelve years, instead of ten years, will facilitate the adoption of a statistical analysis program by providing information on meter performance after ten years.
3. Maintaining historical records of the location where every gas meter has been installed, especially for Southwest which may move gas meters between three states, serves no useful purpose, as considerable data will be for non-California installations where historical data requirements are not similar.
4. Enforcing requirements that were originally adopted to meet conditions which existed many years ago but which no longer exist, and which result in increased costs to the customers of a regulated utility, should not be enforced.

**THEREFORE, IT IS ORDERED that:**

1. Advice Letter 447 shall be marked to show that it was approved by Commission Resolution G-3009.
2. This Resolution is effective today.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on October 6, 1992. The following Commissioners approved it:

  
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NEAL J. SHULMAN  
Executive Director

DANIEL Wm. FESSLER  
President  
JOHN B. OHANIAN  
PATRICIA M. ECKERT  
NORMAN D. SHUMWAY  
Commissioners