Comments to Advance Notice of Proposed Rulemaking of the Pennsylvania Public Utility Commission

Proposed Revisions to Water Audit Methodology; 52 Pa. Code § 65.8 and § 65.14; Meters and Measurement as related to Statement of Policy; Doc. No. L-2020-3021932

Supplement to the Appendix Section of the Comments of Kunkel et. Al dated November 23, 2020

Supplemental Comments by Edward Osann and George Kunkel

Draft Regulatory Language (cont'd)

§ 65.8. Meters.

Subsection (a) and (b) are revised as follows:

~~(a) *Allowable error.* No water meter which has an error in registration of more than 2% may be placed in service, nor may a water meter which has an error in registration of more than 4% be allowed to remain in service, when water is passing through it at approximately the following rates of flow:~~

~~*Meter size (inches)*~~	~~*Gallons per minute*~~
~~5/8~~	~~6~~
~~3/4~~	~~10~~
~~1~~	~~20~~
~~1-1/2~~	~~30~~
~~2~~	~~50~~
~~3~~	~~90~~
~~4~~	~~180~~
~~6~~	~~300~~

(a) *Allowable error – new and rebuilt meters.* No new or rebuilt customer service water meter which has an error in registration greater than that allowed by the test requirements identified in subsection (c) may be placed in service.

(b) *Allowable error – inservice meters.* No water meter which has an error in registration of more than 4% outside the accuracy limits specified by the test requirements identified in subsection (c) shall be allowed to remain in service.

(c) *Test requirements*. Test requirements applicable to this section shall be those contained in Table 5-3, Test requirements for new, rebuilt, and repaired cold-water meters, American Water Works Association Manual M6, Fifth Edition.

(~~b~~d) *Periodic tests.* No public utility furnishing metered water service may allow a water meter of 1 inch or less nor a water meter of more than 1 inch to remain in service for a period longer than 20 years and 8 years respectively without testing it for accuracy and readjusting it if it is found to be incorrect beyond the limits established in subsection (a). No customer service meter shall remain in service for more than 30 years. Upon a customer's request the public utilities shall also perform a meter test without charge if a meter has been in service, and has not been tested, for a period greater than that specified in the following table:

Inch Meter	*Years*
5/8	10
3/4	8
1	6
More than 1	4

[Remainder unchanged]

§ 65.14. Measurement.

(a) *Measuring devices.* Within 3 years after the effective date of this section, each utility shall install a suitable measuring device at each source of supply in order that a record may be maintained of the quantity of water produced by each source.

(b) *Records.* At least once each month, the quantity produced from each source of supply shall be determined. Twelve month totals by sources shall be recorded and transmitted to the Commission with the annual report of the utility to the Commission. The records shall further show actual annual metered consumption and any other properly estimated revenue-producing unmetered water.

(c) *Testing and reporting*. Each utility shall test all production, import, and export flow meters on an annual basis.

1. Test procedures and accuracy limits shall conform with Table 5-3, Test requirements for new, rebuilt, and repaired cold-water meters, American Water Works Association Manual M6, Fifth Edition, or for flowmeter types not listed on this table refer to the in-situ test methods list in Table 6.1 in the American Water Works Association Manual M33, Flowmeters in Water Supply (2018).

2. Any flowmeter which has an error in registration greater than that allowed by the test requirements identified in paragraph 1 shall be repaired or replaced.

3. The following flowmeters are exempt from this requirement:

(i) a flowmeter that measures less than 5 percent of the annual total of water supplied to customers.

(ii) a flowmeter located on an emergency or standby supply pipeline or interconnection if utilized for less than 30 days in a calendar year.

(iii) a flowmeter for which the utility provides documentation of the inability to test based on site conditions or other constraints specific to such flowmeter, and such documentation is approved by the Commission.

4. An annual accuracy verification report containing test results for all flowmeters tested shall be prepared and transmitted to the Commission.

5. No flowmeter shall remain in service for more than 40 years unless documentation of accuracy of such meter is transmitted to and approved by the Commission.