Kay Flynn

From:Katrina TewSent:Wednesday, January 19, 2005 4:37 PMTo:Kay FlynnSubject:FW: Emailing: FPSC letter 1-19-05 defective meters.docImportance:High

Kay,

Sending to you in Blanca's absence. My note below explains it, I think. Feel free to call if you need me.

Thank you,

Katrina

From: Katrina Tew On Behalf Of Charles Davidson
Sent: Wednesday, January 19, 2005 4:15 PM
To: Cochran Keating
Cc: Roland Floyd; Blanca Bayo; JoAnn Chase; Manuel Arisso; Cayce Hinton; Larry Harris
Subject: FW: Emailing: FPSC letter 1-19-05 defective meters.doc
Importance: High

Cochran,

Has this letter been filed in the docket file? Either way, I think you should have it, but I don't want the Commissioner to view anything that may be considered ex parte. It seems to be addressed to all Commissioners, but it looks like the e-mail only went to 3. I've copied the other aides on this note.

Thank you,

Katrina

From: George Brown [mailto:george@susidot.com]
Sent: Wednesday, January 19, 2005 1:08 PM
To: Braulio Baez; Charles Davidson; Lisa Edgar
Cc: Roland Floyd; B GILMORE_SUSI; Ralph Calleja-FPL
Subject: Emailing: FPSC letter 1-19-05 defective meters.doc

Dear Commissioners the attached letter has been sent to your attention for action. Thank You

George C. Brown Southeastern Utility Services, Inc. 7107 E. 36 Ave. Bradenton, FI 34208 941-747-9503 fax 941-745-1155 george@susidot.com

DOCUMENT NUMBER DATE

09848 OCT 30 5

FPSC-COMMISSION CLERK

030623



January 19, 2005

To: Florida Public Service Commission 2540 Shumard Oaks Blvd. Tallahassee, Fl 32399_0850

> Braulio L. Baez, Chairman: <u>bbaez@psc.state.fl.us</u> (by email) Charles M. Davidson, Commissioner: <u>davidson@psc.state.fl.us</u> (by email) J. Terry Deason, Commissioner: By U.S. mail Rudolph Bradley, Commissioner: By U.S. mail Lisa Polak Edgar, Commissioner: <u>ledgar@psc.state.fl.us</u> (by email)

Subject: Defective FPL thermal demand meters

I am writing to advise you about what Southeastern Utility Service, Incorporated has recently discovered in PSC staff witnessed meter tests on Class 1 U and 4L thermal demand meters. You will recall that Class 1 V thermal demand meters failed as a class when testing revealed that + or -16% percent of the meters tested were in error beyond the range of tolerance. The 1U and 4L class of meters is essentially identical in all respects to the 1V class. During our recent testing, we noticed that 1U meters were failing at a rate that should warrant further PSC review, and SUSI believes, replacement ordered of all thermal demand meters that FPL continues to use to measure customers electric demand.

Specifically, SUSI recently had tested at FPL's meter testing center 102 thermal demand meters. These meters were in no way prescreened, but represented thermal demand meters of clients represented by SUSI. PSC staff witnessed these tests. Seventeen (17) of the meters tested greater than the allowable meter error tolerance and six (6) tested less than the allowable meter error tolerance. This amounts to an overall failure rate of approximately twenty three percent (23%). This is an alarming number of failures when only a 7.5% failure rate is allowed before declaring a class of meters no longer acceptable. Also, the other classes of thermal demand meters, including the 4L meters, also have the same construction. Of the meters tested, ninety- five (95) were 1U meters and seven (7) were 4L meters.) With respect to the meters determined to be out of tolerance, almost 74% were overcharging the customer, while only 26% were undercharging.

Given these test results, which FPL can hardly dispute given that the meters were tested using FPL's recently developed methodology of testing meters at average customer load, and witnessed by PSC staff, SUSI respectfully requests that the FPSC take immediate action to declare all of FPL's thermal demand meters suspect, pulled from use and tested for accuracy As you are well aware SUSI has been involved for several years in the investigation of meter errors involving FPL's thermal demand meters. We have a concern regarding the remainder of the thermal demand meters FPL still uses to serve approximately seventy thousand (70,000) of their customers that we hope the Commission shares.

The meter tests to which I am referring are on record at FPL. We are continuing to have additional meters tested, as soon as FPL will agree to test them. However, we cannot help the other FPL customers who are not our clients, or who are not aware of the potential problem and consequently, are not requesting a meter test.

But you can protect them. I strongly urge you to demand that FPL test all of the remaining thermal demand meters, and provide you with the results. We also urge you to have an FPSC representative at the testing site during all of the tests. It has been our experience that a witness substantially improves the quality of the tests.

I will look forward to your reply.

Sincerely,

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George Brown, Vice President Southeastern Utility Services, Inc. 7107 E. 36 Ave. Bradenton, Fl 34208

Cc: Ralph Calleja, FPL National Account Representative: ralph_calleja@fpl.com Roland Floyd, FPSC staff: rfloyd@psc.state.fl.us Bill Gilmore, Vice President, SUSI: bill@susidot.com