



**Diane Roy**  
Vice President, Regulatory Affairs

**Gas Regulatory Affairs Correspondence**  
Email: [gas.regulatory.affairs@fortisbc.com](mailto:gas.regulatory.affairs@fortisbc.com)

**Electric Regulatory Affairs Correspondence**  
Email: [electricity.regulatory.affairs@fortisbc.com](mailto:electricity.regulatory.affairs@fortisbc.com)

**FortisBC**  
16705 Fraser Highway  
Surrey, B.C. V4N 0E8  
Tel: (604)576-7349  
Cell: (604) 908-2790  
Fax: (604) 576-7074  
[www.fortisbc.com](http://www.fortisbc.com)

August 16, 2022

B.C. Sustainable Energy Association  
c/o William J. Andrews, Barrister & Solicitor  
70 Talbot Street  
Guelph, ON  
N1G 2E9

Attention: Mr. William J. Andrews

Dear Mr. Andrews:

**Re: FortisBC Energy Inc. (FEI)**  
**Project No. 1599211**

**Application for a Certificate of Public Convenience and Necessity (CPCN) for  
Approval of the Advanced Metering Infrastructure (AMI) Project (Application)**

**Response to the B.C. Sustainable Energy Association (BCSEA) Information  
Request (IR) No. 4 on Evidentiary Update**

---

On May 5, 2021, FEI filed the Application referenced above. In accordance with the regulatory timetable as amended in British Columbia Utilities Commission Order G-206-22 for the review of the Application, FEI respectfully submits the attached response to BCSEA IR No. 4 on Evidentiary Update.

For convenience and efficiency, FEI has occasionally provided an internet address for referenced reports instead of attaching lengthy documents to its IR responses. FEI intends for the referenced documents to form part of its IR responses and the evidentiary record in this proceeding.

If further information is required, please contact the undersigned.

Sincerely,

**FORTISBC ENERGY INC.**

***Original signed:***

Diane Roy

Attachments

cc (email only): Commission Secretary  
Registered Parties



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Advanced Metering Infrastructure (AMI) Project (Application)	Submission Date: August 16, 2022
Response to British Columbia Sustainable Energy Association (BCSEA) Information Request (IR) No. 4 on Evidentiary Update	Page 1

1   **37.0   Topic:           Meter Exchange Dispensation**

2           **Reference:   Exhibit B-30, FEI Evidentiary Update, pdf p.6**

3           37.1   What is the impact in dollars of the loss of the meter exchange dispensation benefit  
4                   in relation to FEI's AMI project?

5  
6   **Response:**

7   Please refer to the response to BCUC IR4 49.2.

8  
9

10

11           37.2   What information did FEI provide to Measurement Canada regarding the financial  
12                   impact on FEI's AMI project of a decision to require continued exchanging of gas  
13                   meters for compliance sampling until the year of mass deployment?

14

15   **Response:**

16   FEI has not provided financial information to Measurement Canada (MC) related to the AMI  
17   Project. MC is responsible for ensuring accuracy in the selling of measured goods, developing  
18   and enforcing the laws related to measurement accuracy, approving and inspecting measuring  
19   devices, and investigating complaints of suspected inaccurate measurement. Therefore, MC's  
20   mandate is the protection of consumers in relation to measurement for billing and MC is required  
21   to fulfill the mandate of measurement accuracy as a primary objective.

22   As discussed in the response to BCUC IR4 50.1, FEI requested MC to consider gas utilities for  
23   dispensation in a similar model to consideration given electric utilities conducting meter mass  
24   deployments. MC developed the policy for gas meter dispensation in parallel with the BCUC  
25   proceeding to consider the Application. MC used the experience gained from electric utility  
26   advanced meter deployments in developing the gas meter dispensation policy that authorizes  
27   dispensation in the year that mass meter deployment begins. The gas meter dispensation policy  
28   ensures that meter dispensation will only be approved by MC if it is certain that a utility will  
29   immediately proceed with mass deployment of meters. This reduces the risk of a utility operating  
30   with expired meters in the event of deployment delays.

31  
32

33

34           37.3   What are Measurement Canada's reasons for requiring continued exchanging of  
35                   gas meters for compliance sampling until the year of mass deployment? Did  
36                   Measurement Canada consider the financial impact on gas utilities and their  
37                   customers?

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Advanced Metering Infrastructure (AMI) Project (Application)	Submission Date: August 16, 2022
Response to British Columbia Sustainable Energy Association (BCSEA) Information Request (IR) No. 4 on Evidentiary Update	Page 2

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36

**Response:**

Please refer to the response to BCSEA IR4 37.2.

37.4 Has FEI considered an appeal or other recourse by which FEI could challenge Measurement Canada's new policy requiring continued exchanging of gas meters for compliance sampling until the year of mass deployment? If so, what is the status? If not, why not?

**Response:**

FEI has not considered an appeal to challenge the MC gas meter dispensation policy.

As stated in the response to BCSEA IR4 37.2, MC considered its experience with electric utility advanced meter deployments in developing the meter dispensation policy for gas utilities.

Finally, as stated in the response to BCUC IR4 50.2, FEI determined that the already contemplated installation of advanced meters in 2023 as part of its MC meter exchange compliance program is also the best course of action in the context of MC's new gas policy for meter dispensation.

37.5 Is FEI aware of any other gas utility directly affected by Measurement Canada's decision to require continued exchanging of gas meters for compliance sampling until the year of mass deployment?

**Response:**

FEI is not aware of any other gas utility in Canada that is applying for temporary dispensation to assist with the mass deployment of gas meters at this time. However, FEI expects the new MC temporary meter dispensation policy will influence how other Canadian gas utilities plan their respective mass deployment strategies at the time when they are finalizing the development of their AMI applications. Please also refer to the response to BCSEA IR4 37.2 which explains why MC formulated its policy related to temporary meter dispensation in the gas context as it did.



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Advanced Metering Infrastructure (AMI) Project (Application)	Submission Date: August 16, 2022
Response to British Columbia Sustainable Energy Association (BCSEA) Information Request (IR) No. 4 on Evidentiary Update	Page 3

1            37.6    Please provide a copy and a reference for Measurement Canada’s new policy  
2                            regarding compliance sampling of gas meters during the period prior to mass  
3                            deployment of new meters. Who exactly made the decision? What is the statutory  
4                            authority for the decision?  
5

6            **Response:**

7            Please refer to Attachment 37.6 for a copy of the MC policy.

8            FEI understands that the Director (President) of MC has the responsibility for the decision and  
9            the authority related to dispensation. As noted in section 9(2) of the *Electricity and Gas Inspection*  
10            *Act* related to temporary dispensation, “the director may grant permission for the putting into  
11            service, without verification and sealing or without sealing, of any meter or any class, type or  
12            design of meter on a temporary basis under such terms and conditions and for such period as the  
13            director stipulates.”<sup>1</sup>  
14

---

<sup>1</sup> *Electricity and Gas Inspection Act* R.S.C., 1985, c. E-4 Meters, Sections 9-11.

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Advanced Metering Infrastructure (AMI) Project (Application)	Submission Date: August 16, 2022
Response to British Columbia Sustainable Energy Association (BCSEA) Information Request (IR) No. 4 on Evidentiary Update	Page 4

1    **38.0    Topic:            Labour Cost Increase**

2            **Reference:    Exhibit B-30, FEI Evidentiary Update**

3            38.1    If the AMI Project is approved and implemented, would the increased Labour Cost  
4                    of the AMI Project, as indicated in the Evidentiary Update, put upward pressure on  
5                    FEI's non-AMI labour costs, either directly or through retention difficulties? If so,  
6                    please discuss whether this would be a material financial implication of approval  
7                    of the AMI Project.

8  
9    **Response:**

10    If the AMI Project is approved and implemented, FEI does not expect that the increased labour  
11    cost of the AMI Project as indicated in the Evidentiary Update will put upward pressure on FEI's  
12    non-AMI labour costs.

13    First, FEI's non-AMI labour costs are a combination of internal labour and contractors with  
14    approximately 40 to 45 percent of work completed by contractors, depending on the year. As  
15    such, the portion of internal labour costs for FEI's non-AMI work will be subject to the rates of pay  
16    set out in the applicable collective agreement. Future pay adjustments in the collective agreement  
17    would not be dependent on the AMI Project or AMI labour.

18    Second, as discussed in the Evidentiary Update, the cost pressures experienced by FEI are due  
19    to current labour market conditions in the Province, and these pressures exist regardless of  
20    whether the AMI Project is implemented or not. FEI has reflected these increases in the Baseline  
21    scenario independently without the AMI Project (pages 3 to 4 of Evidentiary Update).

22    Finally, FEI does not anticipate indirect pressure due to retention difficulties, because FEI does  
23    not expect there will be significant movement from its non-AMI workforce to its AMI workforce.  
24    As such, FEI does not expect future cost pressures experienced by FEI's non-AMI labour would  
25    be due to the AMI Project or the resulting AMI labour.

26  
27

28  
29            38.2    More generally, please discuss the implications for FEI and delivery rates of the  
30                    sharp tightening of the labour market in the context of the several large capital  
31                    projects for which FEI is currently seeking BCUC approval.

32  
33    **Response:**

34    As part of FEI's Annual Review for 2023 Delivery Rates, FEI engaged Wood Mackenzie Supply  
35    Chain Consulting (Wood Mackenzie) to provide a market report on gas utility transmission and  
36    distribution to better understand the extent of the inflationary impacts that have affected North  
37    American utilities since 2020. This report was included as Appendix C1 of the Annual Review.



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Advanced Metering Infrastructure (AMI) Project (Application)	Submission Date: August 16, 2022
Response to British Columbia Sustainable Energy Association (BCSEA) Information Request (IR) No. 4 on Evidentiary Update	Page 5

1 Wood Mackenzie identified an average escalation of 31.2 percent in capital costs for gas utilities  
2 between the period of the first quarter of 2020 and the first quarter of 2022, and expects that the  
3 average capital costs will remain close to the higher level of 2022 until the fourth quarter of 2024,  
4 and will not come down to the 2020 level. FEI is experiencing similar inflationary impacts  
5 throughout its sustainment and major projects portfolios.

6 For FEI's other CPCN applications that are currently before the BCUC for review, construction is  
7 not planned to commence until after 2024, at which time the longer term forecast is for inflation to  
8 return to historical levels.

9

**Attachment 37.6**

---



# ENF-33—Policy on granting temporary permission for the use of gas meters without reverification for the purpose of mass meter deployment initiatives

**Category:** Enforcement

**Issue date:** 2021-12-22

**Effective date:** 2021-12-22

**Revision number:** 1

**Supersedes:** N/A

## 1.0 Purpose

The purpose of this bulletin is to communicate the policy terms and conditions for granting temporary permission to gas contractors to use meters that are not expected to be reverified in accordance with the schedule established in bulletin G-18 pursuant to the *Electricity and Gas Inspection Act*.

## 2.0 Scope

This policy applies to meter types, models and/or groups of meters that gas contractors intend to leave in service past the reverification period strictly for the purpose of implementing mass deployment of advanced metering technologies. This policy applies only to gas contractors who, as a result of extraordinary circumstances, are not capable of meeting the legal requirements of Measurement Canada (MC) and the province as applicable.

Gas contractors who meet the policy terms and conditions contained in this document and formally accept them in writing will qualify to obtain a temporary dispensation from reverification.

This policy only applies to meters used in the retail market.

## 3.0 Authority

In accordance with this bulletin, temporary permission is granted under the authority of subsection 9(2) of the *Electricity and Gas Inspection Act*.

## 4.0 References

[\*Electricity and Gas Inspection Act\*](#)

[\*Electricity and Gas Inspection Regulations\*](#)

[G-18—Reverification Periods for Gas Meters, Ancillary Devices and Metering Installations](#)

[GEN-29—Transfer of Ownership of Electricity and Gas Meters](#)

LMB-EG-04—Statistical Sampling Plans for the Verification and Reverification of Electricity and Gas Meters

[PS-G-06—Provisional Specifications for the Approval, Verification, Reverification, Installation and Use of Ultrasonic Meters](#)

[PS-G-17—Provisional Specifications for the In Situ Verification, Reverification, Installation and Use of Pressure Factor Metering Installations](#)

[S-G-02—Specifications for the Verification and Reverification of Diaphragm Meters](#)

[S-S-06—Sampling Plans for the Inspection of Isolated Lots of Meters in Service](#)

## 5.0 Background

Many gas contractors are undertaking a mass deployment of new advanced metering technologies to improve the reliability, monitoring and management of their systems and provide added benefits to their customers. The extraordinary number of meters to be replaced under the implementation schedule has significantly challenged the capability of the gas contractors to replace all these meters while ensuring that compliance with the legal requirements of the *Electricity and Gas Inspection Act* is maintained.

MC is working to assist gas contractors in their efforts to implement new advanced metering technologies within a short time frame while mitigating costs and the potential impact on measurement accuracy.

This bulletin establishes a policy for granting a temporary permission allowing certain meters to remain in service without requiring reverification under exceptional circumstances. The temporary permission is effective for the specified implementation period. Under this policy, the gas contractor must:

- a. ensure that the integrity and accuracy of subject meters are maintained;
- b. provide objective evidence to support the decision to allow the subject meter types, models and/or groups of meters to remain in service without being reverified;
- c. provide a plan that includes conditions to mitigate the risk of inaccurate meters remaining in service.

## 6.0 Policy

### 6.1 General principal

To ensure that the integrity and accuracy of meters are maintained, objective evidence must be provided by the gas contractor to support the decision to extend the reverification period of the subject meter types, models and/or groups of meters in order to mitigate the risk of inaccurate meters remaining in service.

### 6.2 General process for granting temporary permission to use meters without reverification

The general process used by MC for granting gas contractors a temporary permission to use meters without requiring reverification is described in Appendix A (see Figure 1).

Meters must not be added to the original group of meters that were granted temporary dispensation.

### 6.3 Termination of temporary permission to use meters without reverification

#### 6.3.1 Expiry of temporary permission to use meters without reverification

A temporary permission must remain in effect for a maximum of two years from the date it was granted under this policy until December 31 of the second year, subject to renewal at that time unless otherwise withdrawn for cause by MC.

**Note:** "Withdrawn for cause" includes, but is not limited to:

- gas contractors who cease to provide periodic updates and assistance to MC,
- instances where meters are found to have been added to the original group of meters that were granted a temporary dispensation,
- the detection of a problem that undermines the initial analysis and conclusions that led to the decision to grant temporary dispensation, or
- gas contractors who fail to abide by their own conditions specified in their plan submitted to MC.

### 6.3.2 Modification or termination of the mass meter deployment initiative

If the mass meter deployment initiative were to change or cease due to a change in events or the extraordinary circumstances under which the temporary permission to use meters without reverification was granted, the gas contractor must provide a list of meters in their system that are overdue for reverification at that time, and submit a plan to the MC regional office that includes the schedule for the removal of those same meters.

### 6.3.3 Withdrawal of temporary permission to use meters without reverification

If the temporary permission to allow meters to remain in service without reverification is withdrawn for cause, the President of MC will notify the gas contractor of the termination and revocation of the permission.

### 6.3.4 Suspension of temporary permission to use meters without reverification

A temporary permission to use specific meter types, models and/or groups of meters to remain in service without reverification can be partially suspended where a problem is detected that undermines the initial analysis and conclusions which were used to support the decision to grant the permission.

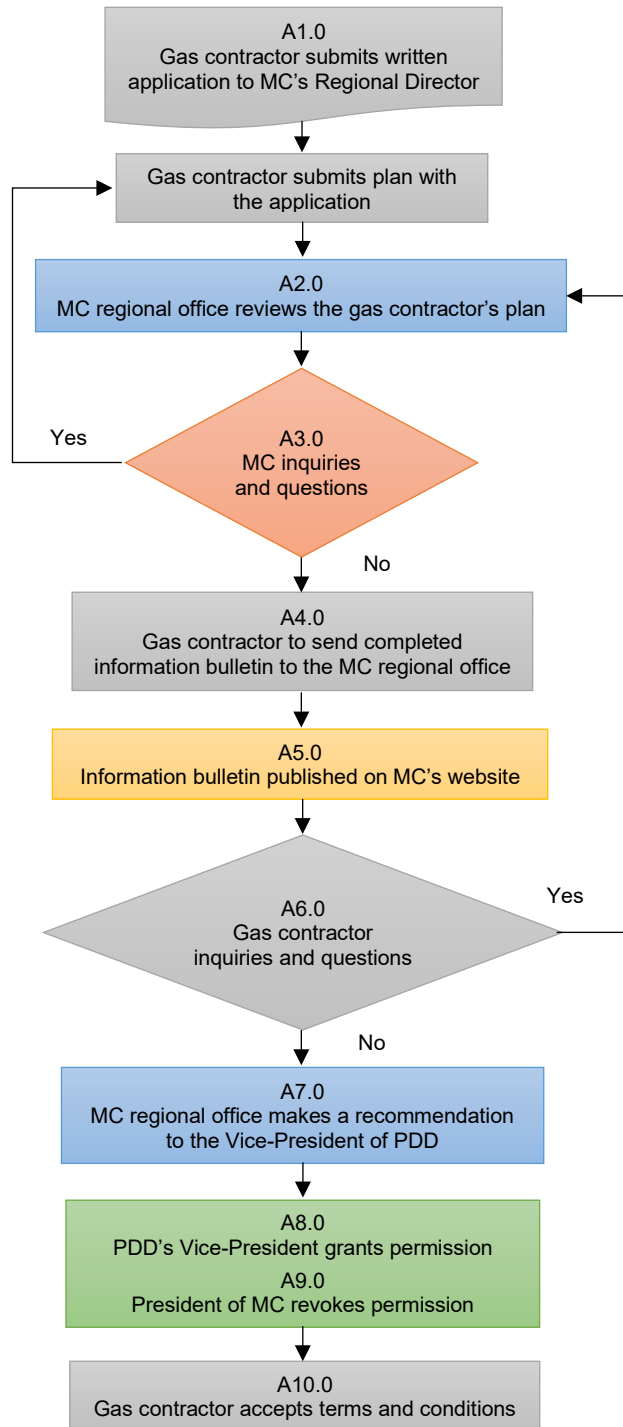
## 6.4 Terms and conditions to be met by gas contractors in order to obtain temporary permission to use meters without reverification

All registered gas contractors must:

- a. apply in writing to MC to obtain or renew a temporary permission to use meters without reverification, as required in the process flow chart of Appendix A,
- b. submit a plan to be approved by MC prior to the reverification expiry date of the meters, as required in the process flow chart of Appendix A,
- c. perform the review and required analysis of the meters' compliance sampling results to ensure MC is confident that specific meter types, models and/or groups of meters can be extended for a given period and that the extension will not lead to inaccuracies outside of the legal tolerances,
- d. provide the results of the analysis specified in item (c) above to the MC regional office for review, qualification and recommendation before using meters in service past their reverification period,
- e. provide a plan indicating their proposed administrative requirements for implementing the specific process flow chart elements of Appendix B, which must include applicable references to the gas contractor's existing quality documentation and the names of the responsible parties, and
- f. once the temporary dispensation is granted, provide status reports of the progress of their mass meter deployment and meter replacement initiatives to MC twice each year (e.g. in January and July); MC will audit the process, as a minimum, once each year.

The application and supporting documents referred to in this section must be received by MC prior to September 1 of each year.

## Appendix A—General process for granting temporary permission to use meters without reverification



**Figure 1: Process flow chart for granting temporary permission to use meters without reverification**

**A1.0** The gas contractor must officially apply, in writing to the MC Regional Director, temporary permission to extend the reverification period of the groups of meters specified in the plan submitted to and reviewed by the MC regional office.

**A2.0** The MC regional office will review the gas contractor's plan in support of the temporary permission and establish recommendations for approving the plan.

**A3.0** On request, the gas contractor meets with MC to clarify or discuss the plan and answer MC's questions within a reasonable amount of time frame.

**A4.0** Each gas contractor must complete the information bulletin template provided in Appendix C and provide it to the MC regional office.

**A5.0** The information bulletin referred to in A4.0 is published on MC's website for a 30-day consultation period to ensure stakeholders are informed and given the opportunity to make representations on the proposed application for a temporary permission to use meters without reverification.

**A6.0** The gas contractor can contact the representative of the MC regional office for any inquiries regarding this policy or the temporary permission to use meters without reverification.

**A7.0** The MC regional office to provide a recommendation for the granting of a temporary permission to use meters without reverification to the Vice-President of the Program Development Directorate (PDD).

**A8.0** The Vice-President of PDD grants the temporary permission to use meters without reverification in writing.

**A9.0** The President of MC notifies the gas contractor in writing of the revocation of the temporary permission to use meters without reverification, where applicable.

**A10.0** The gas contractor must formally accept the terms and conditions contained in this policy in writing.

## Appendix B–Process element requirements to be included in the gas contractor's plan

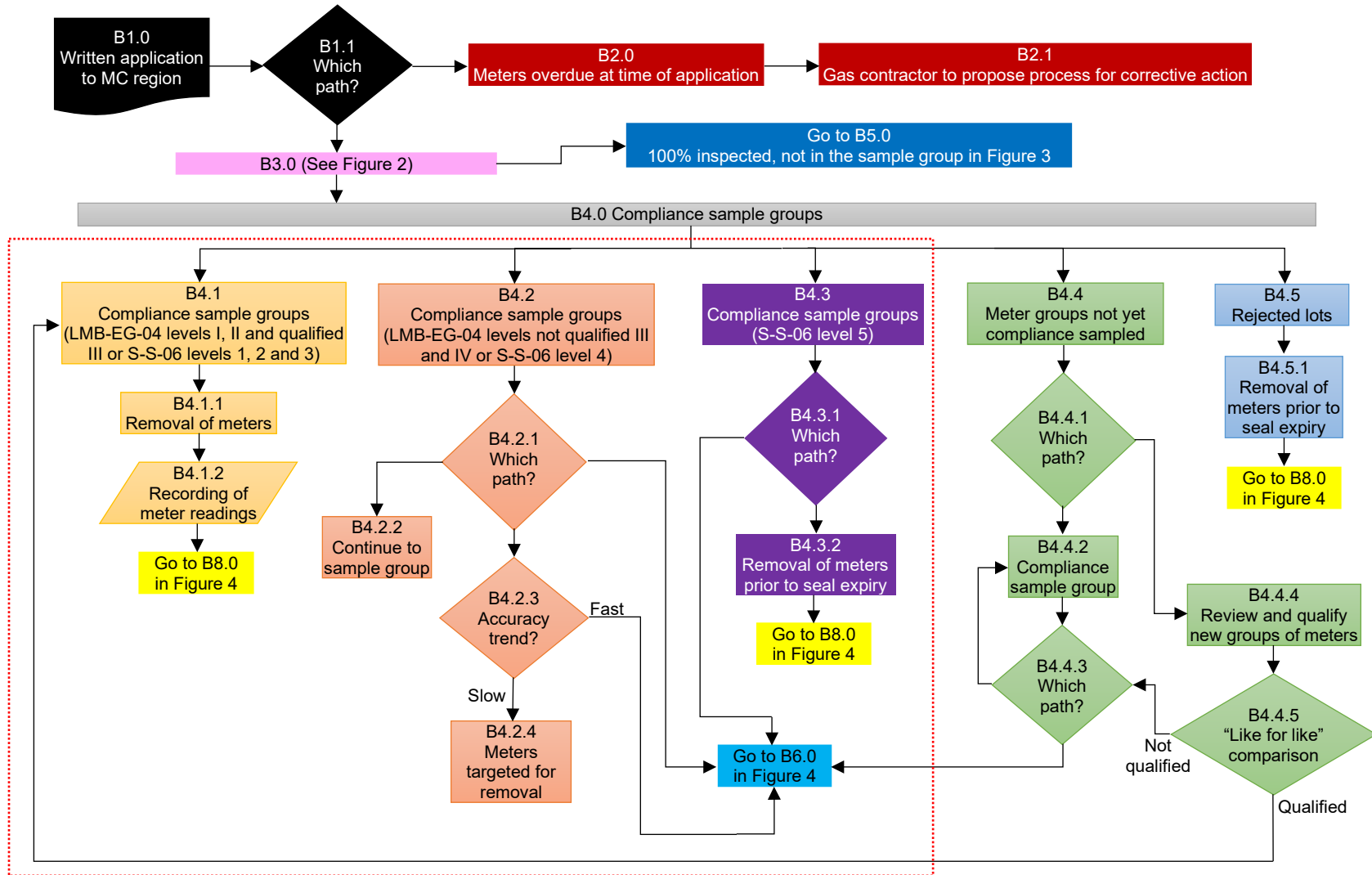


Figure 1: Flow chart elements

### **B1.0 Written application to MC region**

The gas contractor is required to submit in writing an application for temporary permission to use meters without reverification. The application must be sent to the MC regional director in the form of a letter addressed to the President of MC and signed by the gas contractor's representative who is responsible for ensuring compliance with the *Electricity and Gas Inspection Act*.

### **B1.1 Which path?**

A decision must be made regarding the selection of the appropriate path. Choose either:

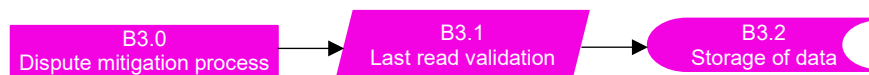
- **B2.0** and **B2.1**, or
- **B3.0**

### **B2.0 Overdue meters at time of application**

This is intended to identify meters that are overdue for reverification at the time of requesting the temporary dispensation and are not considered to be eligible for inclusion within it.

### **B2.1 Gas contractor to propose process for corrective action**

The gas contractor must provide to MC the corrective action required for removing the overdue meters from service and these meters cannot be considered to be included within the temporary dispensation. The corrective action for overdue meters must follow the current policy of requiring overdue meters to be removed from service within an acceptable time frame such as one year from notification.



**Figure 2: Flow chart elements**

### **B3.0 Dispute mitigation process**

The gas contractor must include in the plan a process to ensure disputes and complaints are held to a manageable level for MC. This plan must consider potential dispute trigger points typically related to meter removal such as:

- an incorrect removal reading;
- the incorrect use of meter and system multipliers

### **B3.1 Last read validation**

The gas contractor must establish a process to ensure the last reading is correct.

### **B3.2 Storage of data**

The data to be stored by the gas contractor must include, but is not limited to, the date the meter was removed and the applicable readings, metering information and account number, as well as the information applicable to the validating of the last meter reading for the purpose of mitigating the number of disputes.

### **B4.0 Compliance sample groups**

This section indicates the path branches according to the meter types, models and/or groups of meters subject to compliance sampling by the gas contractor at the time of requesting the temporary dispensation. This includes diaphragm gas meters and ultrasonic domestic gas meters (temperature converting only) that are actively sampled using sampling plans authorized by MC.

#### **B4.1 Compliance sample groups (LMB-EG-04 levels I, II and qualified III<sup>1</sup> or S-S-06 levels 1, 2 and 3)**

The gas contractor must demonstrate the lot's eligibility to remain in service past the reverification period by examining the current lot reverification date and previous compliance sampling acceptance levels.

The gas contractor must review compliance sample groups that are due for reverification within the period of the temporary dispensation and must specify in the plan which meter types, models and/or groups have previously been granted a level 1, 2 or 3 seal extension under S-S-06 or met level I, II or qualified III acceptance criteria under LMB-EG-04. Meter types, models and/or groups of meters for which they provide the applicable performance history will be permitted to remain in service past the reverification period without being subject to any additional conditions.

**Note:** A compliance sample group that meets the qualified III level acceptance under LMB-EG-04 is a group of meters whose previous compliance sampling results are similar to the most recent results (i.e. the group met level III acceptance criteria in the most recent results and a level III or level IV acceptance criteria in the previous results). This trend indicates that the accuracy of the meters is maintained at the current level, and the risk of it falling outside the legal tolerance during the period of the temporary dispensation is low.

##### **B4.1.1 Removal of meters**

The gas contractor must remove the meters that have been permitted to remain in service past the reverification period, following the plan submitted to MC for the removal of them.

##### **B4.1.2 Recording of meter readings**

The gas contractor records the applicable data and meter readings as required.

#### **B4.2 Compliance sample groups (LMB-EG-04 levels not qualified III and IV or S-S-06 level 4)**

This section applies to compliance sample groups that met only level 4 acceptance criteria under S-S-06 or only level IV acceptance criteria under LMB-EG-04, or that are considered as "not qualified level III" compliance sampling groups under LMB-EG-04.

A compliance sample group that meets the "not qualified level III" acceptance criteria under LMB-EG-04 is a group of meters whose previous compliance sampling results are significantly better than the most recent results (e.g. the group met level III acceptance criteria in the most recent compliance sampling but only level I in the previous compliance sampling). This trend indicates that the accuracy of the meters is deteriorating or inconsistent and is expected to soon fall outside the legal tolerance.

**Note:** Compliance sample groups that have been granted a level 4 seal extension under S-S-06 or that met levels "not qualified III" and IV acceptance criteria under LMB-EG-04 are subject to conditions in order to mitigate the risk of these meters' accuracy falling outside the legal tolerance.

##### **B4.2.1 Which path?**

A decision must be made regarding the selection of the appropriate path. Choose either:

- **B6.0**
- **B4.2.2** or
- **B4.2.3.**

---

<sup>1</sup> Levels I, II, III and IV refer to the acceptance criteria levels under LMB-EG-04.

#### **B4.2.2 Continue to sample group**

The gas contractor has the option to not include groups of meters as part of the temporary dispensation and continue to sample the groups of meters prior to the end of the meter's reverification period, as long as the meters qualify as eligible groups under MC's compliance sampling plans.

The gas contractor must specify in the plan submitted to MC which groups of meters are not included as part of the temporary dispensation.

#### **B4.2.3 Accuracy trend**

The gas contractor must review the accuracy trend of the groups of meters that were granted a level 4 seal extension under S-S-06 or that met levels "not qualified III" and IV acceptance criteria under LMB-EG-04 in order to determine if the groups of meters can remain in service past the reverification period.

- If the analysis determines that the accuracy trend of the groups of meters is slow (i.e.  $\bar{x} \leq 0$  and the most recent  $\bar{x}_{new} \leq \bar{x}_{previous}$  for these groups), the gas contractor is to proceed to **B4.2.4**.
- If the analysis determines that the accuracy trend of the groups of meters is fast, the meters may remain in service past the reverification period and the gas contractor is to proceed to **B6.0** for the testing of all the meters in the groups upon removal as per.

#### **B4.2.4 Meters targeted for removal**

The gas contractor must provide a plan for the removal of groups of slow meters that are expected to soon fall outside of the legal tolerance for disputes (over 3% slow). The expectation is that these meters would be targeted for early removal, within at least one year after the reverification period.

#### **B4.3 Compliance sample groups S-S-06 level 5**

This section applies to compliance sample groups that met only level 5 acceptance criteria under S-S-06.

##### **B4.3.1 Which path?**

A decision must be made regarding the selection of the appropriate path. Choose either:

- **B6.0** or
- **B4.3.2**.

##### **B4.3.2 Removal of meters prior to seal expiry**

The gas contractor has the option not to include groups of meters as part of the temporary dispensation. They must remove the groups of meters from service prior to the end of the normal reverification period and proceed to **B8.0**.

The gas contractor must specify in the plan submitted to MC which groups of meters are not included as part of the temporary permission.

#### **B4.4 Meter groups not yet compliance sampled**

This section applies to groups of meters that are eligible for compliance sampling but had never been verified using MC's compliance sampling plans at the time of application. These groups of meters could be due for reverification during the period of the temporary dispensation.

The gas contractor must specify in the plan submitted to MC which groups of meters could remain in service past the normal reverification period.



#### **B4.4.1 Which path?**

A decision must be made regarding the selection of the appropriate path. Choose either:

- **B4.4.2** or
- **B4.4.4.**

#### **B4.4.2 Compliance sample group**

The gas contractor has the option to not include groups of meters as part of the temporary dispensation and continue to sample the groups of meters before the end of the meters' reverification period, as long as the meters qualify as eligible groups under MC's compliance sampling plans.

The gas contractor must specify in the plan submitted to MC which groups of meters are not included as part of the temporary dispensation.

#### **B4.4.3 Which path?**

A decision must be made regarding the selection of the appropriate path. Choose either:

- **B6.0** or
- **B4.4.2.**

#### **B4.4.4 Review and qualify new groups of meters**

The gas contractor must review the new groups of meters that have never been sampled using MC compliance sampling plans. The review will determine if there are other groups of meters owned by them that can be considered homogeneous (e.g. same make, model and capacity rating) to the sample group in question and have been produced by the same manufacturer within the last four years. The gas contractor is to determine if the compliance sample results for the identical meter types qualify the new group of meters to remain in service past the normal reverification period, without any additional conditions. The new meter groups are considered to qualify if the review determines that the identical meter type attained the same levels as those stated in **B4.1** above. The gas contractor's plan must provide data to demonstrate to MC the new groups of meters qualify for inclusion in the temporary permission.

#### **B4.4.5 "Like for like" comparison**

The gas contractor is to determine whether or not the meter groups qualify for inclusion in the sample group.

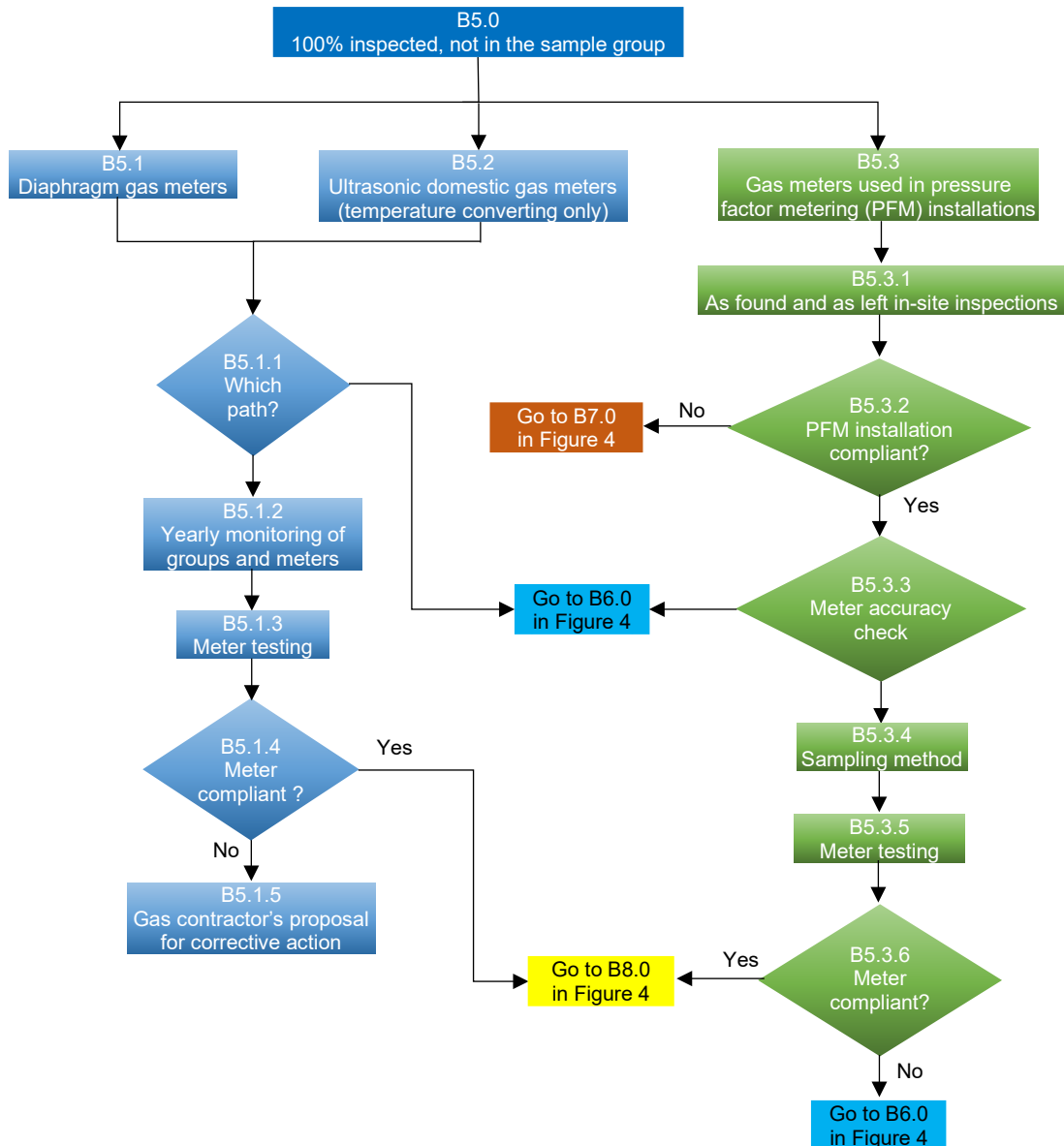
- If the meter groups are qualified, proceed to **B4.1**.
- If the meter groups are not qualified, proceed to **B4.4.3**.

#### **B4.5 Rejected lots**

This element applies to compliance sampling groups that have not met the acceptable accuracy criteria of MC's sampling plans and were rejected.

##### **B4.5.1 Removal of meters prior to seal expiry**

The gas contractor must remove the groups of meters from service prior to the end of the specified reverification period and proceed to **B8.0**.



**Figure 3: Flow chart elements**

**B5.0 100% inspected, not in the sample group**

This section indicates the path branches according to the meter types, models and/or groups of meters subject to 100% inspection by the gas contractor at the time of requesting the temporary dispensation. This includes diaphragm gas meters, ultrasonic domestic gas meters (temperature converting only) and gas meters used in pressure factor metering (PFM) installations that are systematically verified or reverified.

**B5.1 Diaphragm gas meters**

This element applies to all diaphragm gas meters that will be due for reverification during the period covered by the temporary dispensation.

### **B5.1.1 Which path?**

A decision must be made regarding the selection of the appropriate path. Choose either:

- **B6.0** or
- **B5.1.2.**

### **B5.1.2 Yearly monitoring of groups and meters**

The gas contractor must monitor the accuracy of the meters using a sampling process based on the requirements of S-S-06 in order to mitigate the risk of inaccurate meters remaining in service. The gas contractor can group the meters as they find most appropriate with respect to their risk assessment, rather than in strict compliance with the homogeneity and time on test requirements of S-S-06, A.1 and A.2. The samples should be representative of the groups of meter types that have been left in service and not have any previous documented evidence of their accuracy based on past performance or history. This monitoring process is limited to only level 4 (LQ 12.5) and level 5 (LQ 20.0) seal extensions. As meters continue to be replaced with new ones, the number of meters to be monitored is expected to decrease each year. They must provide details of the monitoring process in the plan submitted to MC.

### **B5.1.3 Meter testing**

Each meter selected for monitoring purposes will be tested in accordance with the applicable MC verification requirements:

- S-G-02—Specifications for the Verification and Reverification of Diaphragm Meters
- PS-G-06—Provisional Specifications for the Verification, Reverification, Installation and Use of Ultrasonic Meters

### **B5.1.4 Determining compliance**

The meters are to be assessed for compliance with MC requirements.

- If the meters comply with MC verification requirements, they are permitted to remain in service past the reverification period and, once removed, proceed to **B8.0** to dispose of them.
- If the meters do not comply with MC verification requirements, proceed to **B5.1.5.**

### **B5.1.5 Gas contractor's proposal for corrective action**

The gas contractor must provide to MC the corrective action required to remove the meters from service, or propose a process for additional testing or analysis to mitigate the risk of inaccurate meters remaining in service. The plan submitted by them must include requirements for corrective action to be instituted if the results of the monitoring indicate significant deterioration of the accuracy of the subject meters.

### **B5.2 Ultrasonic domestic gas meters (temperature converting only)**

This element applies to all ultrasonic domestic gas meters (temperature converting only) that will be due for reverification during the period covered by the temporary permission.

### **B5.3 Pressure factor metering installations**

This element applies to all gas meters used in PFM installations. These meters will be due for reverification during the period covered by the temporary permission and will be permitted to remain in service past the reverification period under the conditions below.

### **B5.3.1 As found and as left in situ inspections**

The condition required to permit gas meters used in PFM installations to remain in service past the initial reverification period is to have the metering installation tests performed prior to the removal of the meter (as found) and reconciled with the metering installation test performed on the new meter that is installed in its place (as left). Each PFM installation will be tested in accordance with the applicable MC verification requirements of PS-G-17.

Measuring equipment used for the installation inspections must be traceable to Canadian national standards and must be calibrated at least every two years. Where no traceability to national standards can be provided for a specific type of measuring equipment, a process to ensure the control and periodic checks of the said equipment against a check standard of known error must be established and documented.

### **B5.3.2 Determining compliance**

The PFM installations are to be assessed for compliance with MC requirements.

- If the installations comply with MC verification requirements, proceed to **B5.3.3**.
- If the installations do not comply with MC verification requirements, proceed to **B7.0** to initiate the dispute mitigation process.

### **B5.3.3 Meter accuracy check**

The gas contractor has the option to test the meter that has been permitted to remain in service past the reverification period as per **B6.0** or proceed to **B5.3.4** after the in situ verification is completed as per **B5.3.1** above.

### **B5.3.4 Sampling method**

The accuracy testing of removed meters can be performed by sampling. The gas contractor can group the meters as they find most appropriate with respect to their risk assessment and/or homogeneity criteria. The gas contractor must provide details of the sampling method in the plan submitted to MC.

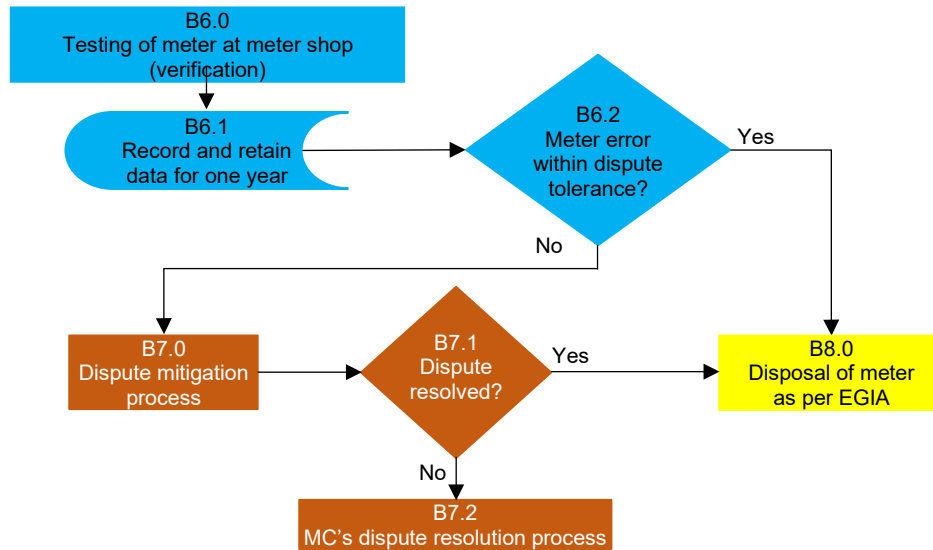
### **B5.3.5 Meter testing**

Each sample meter will be tested at the meter shop in accordance with the applicable MC verification requirements. The verification testing is to be completed by an MC authorized service provider.

### **B5.3.6 Determining compliance**

The meters are to be assessed for compliance with MC requirements.

- If all sample meters comply with the applicable MC verification requirements, proceed to **B8.0** to dispose of the group of meters.
- If one sample meter does not comply with the applicable MC verification requirements, proceed to **B6.0** to test the rest of the meters in the group.



**Figure 4: Flow chart elements**

**B6.0 Testing of meter at meter shop**

A meter that has been used in service past the specified reverification period and subject to the temporary dispensation must be verified using the applicable reverification specifications. The verification testing is to be completed by an MC authorized service provider.

**B6.1 Recording and retention of data**

All the test results must be recorded and retained for a minimum of one year and may be subject to audit by MC.

**B6.2 Meter error within dispute tolerance?**

When the results of the meter’s accuracy test exceed the legal dispute tolerances, the gas contractor must proceed to **B7.0** and forward to MC within 30 days any results demonstrating that the purchaser is entitled to a rebate or that the gas contractor intends to seek an adjustment. If the accuracy of the meter falls within the legal tolerance for disputes, the meter must be disposed of as per **B8.0**.

**B7.0 Dispute mitigation process**

The gas contractor must include in the plan a process to ensure disputes and complaints are held to a manageable level for MC. They must first attempt to mitigate disputes where the results of in situ or meter shop verification accuracy exceed the dispute tolerances. MC must only be contacted in cases where the purchaser is entitled to a rebate or the gas contractor intends to seek an adjustment.

**B7.1 Dispute resolution**

If the dispute with the purchaser is successfully resolved, the gas contractor is to proceed to **B8.0** to dispose of the meter the *Electricity and Gas Inspection Act*.

If the dispute is not resolved, the gas contractor is to proceed to **B7.2**.

**B7.2 Measurement Canada’s dispute resolution process**

The gas contractor is to follow MC's dispute resolution process by contacting the applicable MC representative.

## **B8.0 Disposal of the meter as per the *Electricity and Gas Inspection Act***

The gas contractor is to dispose of the meter as per their requirements and the applicable requirements of MC:

- Cancelling the seal or mark as required in subsection 12(1) of the *Electricity and Gas Inspection Act*.
- Recording the date(s) on which the meter was leased, sold, scrapped, lost or otherwise disposed of, and keeping these records for one year after the meter ceased to be used, as required in paragraph 11(2)(l) of the *Electricity and Gas Inspection Regulations*.
- Maintaining prescribed records as required in subsection 11(2) of the *Electricity and Gas Inspection Regulations*, which include billing records to be kept for one year after the meter ceased to be used.
- Complying with the requirements of MC bulletin GEN-29 if the ownership of the meters is to be transferred.

## Appendix C—Information bulletin template



Innovation, Science and  
Economic Development Canada  
Measurement Canada

Innovation, Sciences et  
Développement économique Canada  
Mesures Canada

---

# Information

---

[YYYY/DD/MM]

### Request for temporary dispensation from meter reverification

Under the provisions of subsection 9(2) of the *Electricity and Gas Inspection Act*, the President of Measurement Canada has received a request to grant a temporary dispensation from meter reverification. In consideration of this request, interested parties may make representation with regard to the following information, as provided by the applicant:

#### Meter owner/contractor

[Meter owner/contractor's name]

[Meter owner/contractor's principal place of business]

Operational area:[Geographical area in which the meter owner/contractor operates]

#### Reason for request

[Describe meter owner's/contractor's reasons for requesting the temporary dispensation]

#### Description of meters identified for temporary dispensation

[Provide the total number of meters included the request and a general description of the type and class of meters (e.g. natural gas, diaphragm gas meters, ultrasonic domestic gas meters, pressure factor metering installation, residential, commercial) and the original meter seal year]

#### Proposed meter performance assurance program

[Briefly describe the actions to be undertaken by the meter owner/contractor to reduce the potential for the occurrence of a non-conformity with the requirements of the *Electricity and Gas Inspection Act*. Where applicable, this may include a reference to programs, criteria or policy documents that have been published by Measurement Canada.]

#### Duration of temporary dispensation

The duration of this request is from [YYYY/MM/DD] to [YYYY/MM/DD].

#### Invitation of representation

Interested parties may submit representations with regard to this temporary dispensation request until [YYYY/DD/MM] to [Name of program officer] at [contact information of program officer (i.e. telephone number and email address)].