

**THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

---

**Fitchburg Gas and Electric Light Company d/b/a Unitil  
2022-2025 Grid Modernization Plan**

---

)  
)  
) **D.P.U. 21-82**  
)

**FITCHBURG GAS AND ELECTRIC LIGHT COMPANY d/b/a UNITIL  
REQUEST FOR WAIVER**

Fitchburg Gas and Electric Light Company d/b/a/ Unitil (“Unitil”) hereby requests that the Department of Public Utilities (“Department”) grant it a waiver from the requirement to provide as part of its filing in this docket an illustrative AMI meter opt-out tariff for Department review.

On May 21, 2021, the Department issued an Order in D.P.U. 20-69-A addressing the form and content of the companies’ July 1, 2021 Grid Modernization Filings. Citing alleged health impacts associated with wireless radio frequency (“RF”) based advanced metering infrastructure (“AMI”), the Department directed each electric distribution company to “include as part of its customer-facing investment plan an illustrative AMI meter opt-out tariff for Department review, with proposed opt-out charges that adhere to traditional ratemaking principles of cost causation.”<sup>1</sup> The Department referred to a similar determination in D.P.U. 12-76-B pertaining to the installation of advanced metering functionality in grid modernization filings to include opt-out approaches that addressed concerns with the effects of RF electric meters.<sup>2</sup> Footnote 54 in D.P.U. 12-76-B referred to Maine Public Utilities Commission Docket No. 2010-345, Order I at 2, providing that some “public utilities commissions have allowed customers to opt out of advanced meters and to take service with a non-RF emitting meter with an associated charge.”<sup>3</sup>

As explained in the accompanying testimony of Kevin E. Sprague, at page 22, as well as the Company’s March 21, 2014 D.P.U. 12-76-A Reply Comments and August 13, 2020 D.P.U.

---

<sup>1</sup> See D.P.U. 20-69-A at 35-36.

<https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/13552861>

<sup>2</sup> See D.P.U 12-76-B at 46. <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/9235208>

<sup>3</sup> Id.

20-69 comments, Unitil's AMI system provided by Landis & Gyr Gridstream does not communicate via RF transmission.<sup>4</sup> The Landis & Gyr AMI system utilizes power line carrier ("PLC") for meter reading and communication. Metering data is transmitted over the electric distribution system conductor to physical endpoints located on the system, not via wireless RF technologies. Unitil initially deployed AMI in 2006 and today, all electric customers have AMI meters utilizing PLC. As the health concerns cited by commenters in D.P.U. 12-76 and D.P.U. 20-69 stemming from RF transmission are not applicable to the Company's AMI system, and development of AMI opt-out offerings would present significant economic, administrative, and operation challenges for Unitil, the Company respectfully requests waiver the requirement to provide an illustrative AMI opt-out tariff.

Respectfully submitted,

**FITCHBURG GAS AND ELECTRIC  
LIGHT COMPANY d/b/a UNITIL**  
By Its Attorney:




---

Gary Epler  
Chief Regulatory Counsel  
Unitil Service Corp.  
6 Liberty Lane West  
Hampton, NH 03842  
603-773-6440 (o)  
603-944-1018 (c)  
epler@unitil.com

#### **Certificate**

I certify that copies of this Request for Waiver have been served this 1st day of July, 2021, via electronic mail, upon the Attorney General.



Gary Epler

---

<sup>4</sup> See March 21, 2014 D.P.U. 12-76 Reply Comments of Fitchburg Gas and Electric Light Company d/b/a Unitil at 19 <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/9237954> and August 13, 2020 D.P.U. 20-69 Initial Comments of Fitchburg Gas and Electric Light Company d/b/a Unitil at 12 <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/12549320>.