


Policy Title:	Meter Accuracy Dispute		
	OFFICE OF THE CHIEF OPERATIONS OFFICER	Category	Meter Technology Accuracy Dispute
		Administrative Policy #	600-OPS-Meter Accuracy Dispute
		Revision #	N/A
		Review Frequency	As Needed – no less frequently than annually
Administrative Division	Operations	Reviewed By	Chief Operating Officer, Chief Legal Counsel, Billing Manager
BOWC Approval	12/18/2020	Last Reviewed/Update Date	12/18/2020
Implementation Date	12/18/2020	Resolution #	20-0331

1. OBJECTIVE

1.1. To establish a process for customers to dispute the amount of water usage on their bill based on an alleged defect in the Detroit Water and Sewerage Department’s (DWSD) metering technology.

2. PURPOSE

2.1. The purpose of this policy is to govern the meter accuracy dispute process to ensure that it evaluates disputes promptly and fairly.

3. DEFINITIONS

“AMR” is an acronym short for Automated Meter Reading, which refers to the meter technology that automatically collects water consumption data from water meters and transfers that data to DWSD’s CIS billing system.

“AWWA Standards” are the the American Water Works Association’s minimum requirements for design, installation, performance, and manufacturing of products used in the drinking water industry.

“CIS” is an acronym for the customer information system, which is the software technology utilized by DWSD for customer billing, field meter services work management, and other customer service related functions.

“Customer” means an Owner, Landlord or Tenant that establishes an account for DWSD services and is responsible for payment of DWSD services.

“Service period” means the dates to be billed for services provided. The begin read date is the beginning of the period, and the end read date is the end of the period.

4. SCOPE

4.1. This policy applies to Customers who dispute the amount of water usage on their bill based an alleged defect in DWSD metering technology. Customers who experience high water usage due to a leak should refer to the Irregular Usage Due to Leak Policy.

5. RESPONSIBILITIES

5.1. Customer

- 5.1.1. Contacts DWSD disputing the accuracy of a bill and requests a meter investigation within 28 days of the disputed billing date.
- 5.1.2. Incurs cost to replace an allegedly defective metering device if testing determines the device was not defective.

5.2. Customer Service Specialist or Dispatcher

- 5.2.1. Provides an explanation of the bill, including daily and hourly usage readings.
- 5.2.2. Provides or directs Customer to this policy.
- 5.2.3. Initiates work order for meter investigation and freezes disputed balance on Customer's account.

5.3. Field Service Technician (FST)

- 5.3.1. Receives work orders and conducts the initial assessment and meter investigation.
- 5.3.2. Conducts any needed removal, replacement or repairs.
- 5.3.3. Completes work order for meter investigation and/or meter testing, as necessary.

5.4. Meter Operations

- 5.4.1. Conducts meter testing.
- 5.4.2. Informs Billing Department and Customer of meter test outcome.

5.5. Billing Department

- 5.5.1. Reviews meter testing results, daily and hourly reads and any additional information.
- 5.5.2. Performs any necessary billing adjustments and send a final communication to the customer informing them of the test results and adjustments.

6. POLICY

6.1. Metering Technology Requirements

- 6.1.1. Only DWSD Customers that have AMR technology installed at their premises may dispute meter technology accuracy.
- 6.1.2. Tampered, damaged or otherwise ineligible metering equipment will not be tested.

6.2. Disputes, Generally

- 6.2.1. A Customer may dispute metering technology accuracy by contacting Customer Service within 28 days of the disputed billing date. After 28 days, Customer forfeits the right to dispute the previous billing cycle.
- 6.2.2. The Customer must schedule a date and time for a meter investigation and must provide on-site access to the meter. An adult over the age of 18 must be present.

6.3. Meter Investigation and Testing

- 6.3.1. An FST will first perform a meter investigation.
- 6.3.2. The Customer may request a meter replacement and testing of the existing, allegedly defective meter at the time they contact Customer Service *or* when the FST comes to the premises for a meter investigation.
 - 6.3.2.1. When requesting a meter test, Customer may also request to witness the test.
 - 6.3.2.2. All meter tests will be conducted in accordance with AWWA Standards.
- 6.3.3. If a Customer wants to dispute DWSD's test results and conduct an independent meter test, Customer must notify DWSD within 3 days of notification of DWSD's test results.
 - 6.3.3.1. Independent testing facilities must have DWSD approval and conduct testing in accordance with AWWA Standards. DWSD approval will not be unreasonably denied.
 - 6.3.3.2. DWSD must be allowed to be present for independent testing.
 - 6.3.3.3. Customer is responsible for any and all costs associated with independent testing.
- 6.3.4. If testing results conclude Customer had a defective meter, the Billing Department determines the billing adjustment pursuant to Section 6.4.

6.4. Billing Adjustments for Defective Meters

- 6.4.1. If meter investigation or testing concludes Customer had a defective meter, the Billing Department will determine the billing adjustment for the month(s) where usage is in dispute using one or more of the following criteria:
 - 6.4.1.1. Estimated water consumption as described in Section 7.3 of DWSD's Water, Sewerage and Drainage Charges policy regarding estimated bills;
 - 6.4.1.2. Averages of actual water consumption for subsequent usage measured by an accurate meter read.
 - 6.4.1.3. The time period and dates during which services were unbilled or underbilled;
 - 6.4.1.4. Rates in effect at time of unbilled or underbilled usage;

6.5. Denial of Meter Accuracy Disputes

- 6.5.1. DWSD may deny a meter test request based on the age or condition of the meter, the frequency of disputes or any private plumbing conditions preventing a new meter from being installed.

6.6. Reasonable and Necessary Accommodations

- 6.6.1. Management may take reasonable and necessary actions to accomplish the intent of this policy.

7. PROCEDURE

7.1. Customer Complaint

- 7.1.1. Customer contacts DWSD regarding accuracy of billing statement.
- 7.1.2. Customer Service performs a review of the accuracy of the bill by reviewing the customer account and metering data for the bill in question.
- 7.1.3. Customer Service will explain the results of the review to the customer. If the Customer disputes the findings, Customer Service advises Customer about the DWSD Irregular Usage Due to Leak Policy and this Meter Accuracy Disputes Policy.
- 7.1.4. If Customer requests a meter investigation, Customer Service issues work order for Meter Operations to schedule a meter investigation.
 - 7.1.4.1. If Customer also requests a meter replacement and/or testing, Customer Service prepares the appropriate work order.
 - 7.1.4.2. Customer account balance is not subject to collection action pending results of meter investigation/test.

7.2. Meter Investigation and Testing

- 7.2.1. Meter Operations schedules investigation with Customer.
 - 7.2.1.1. An FST performs a meter investigation, observing flow for indications of usage and reviewing other visually identifiable components of the metering equipment and surrounding area.
 - 7.2.1.2. The FST completes the meter investigation and notates the results of the investigation in the work order. The FST explains their findings to the customer.
- 7.2.2. If the Customer disputes the FST's findings and requests a meter test, the FST creates a meter test work order.
- 7.2.3. Meter Operations schedules meter test within 2-3 working days. If Customer requested to be present, Meter Operations offers to schedule a meter test within 7 working days so Customer may be present.
- 7.2.4. Meter Operations will send Customer and Billing Department notification of meter test results in writing.
 - 7.2.4.1. If meter test concludes Customer had a defective Meter, the Billing Department will determine the appropriate billing adjustment pursuant to Paragraph 6.4 above.
- 7.2.5. If Customer requests an independent meter test, Customer submits documentation regarding the independent testing facility for DWSD approval.
 - 7.2.5.1. DWSD notifies Customer if it will attend the test.
 - 7.2.5.2. If testing results concludes Customer had a defective meter, the Billing Department determines the billing adjustment pursuant to Paragraph 6.4.