

# CITIZEN POWER

*Public Policy Research Education and Advocacy*

September 14, 2012

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
PO Box 3265  
Harrisburg, PA 17105-3265

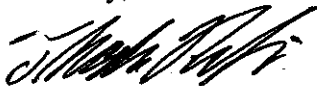
**Re: Petition of Duquesne Light Company for Approval of its Smart Meter Technology Procurement and Installation Plan; Docket No. M-2009-2123948**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission please find the Prehearing Memorandum of Citizen Power in the above-referenced proceeding.

Copies of this Petition have been served in accordance with the attached Certificate of Service.

Sincerely,



Theodore Robinson  
Counsel for Citizen Power

Enclosure

cc: per Certificate of Service  
Honorable Katrina L. Dunderdale

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for :  
Approval of its Smart Meter Technology : Docket No. M-2009-2123948  
Procurement and Installation Plan :

**PREHEARING MEMORANDUM OF CITIZEN POWER, INC.**

Pursuant to the Public Utility Code, 52 Pa. Code § 5.222(d)(1), and in response to the September 4, 2012 Administrative Law Judge’s Prehearing Conference Order in the above-captioned matter, Citizen Power, Inc. (“Citizen Power”) provides the following information:

**I. Introduction:** On June 29, 2012, Duquesne Light Company (“DLC”) filed with the Pennsylvania Public Utility Commission (“Commission”) its Final Smart Meter Technology Procurement and Installation Plan (“Plan”) and a Petition requesting approval of the Plan. The Plan provides a history of DLC’s smart meter filings with the Commission, an explanation of the changes needed to meet the Act 129 requirements, an elucidation of the technology chosen for both the Meter Data Management System and the Advanced Meter Infrastructure (“AMI”), a description of the smart meter capabilities, a proposed deployment schedule, an estimate of the program’s costs, and the customer education strategy. The Plan was supported by the direct testimony of David Wolfe, William V. Pfrommer, and Peter Honebein.

On July 23, 2012, the Office of the Consumer Advocate and Citizen Power both filed Answers to the Smart Meter Petition requesting that the matter be referred to the Office of Administrative Law Judge for further proceedings. On August 17, 2012, the Commission issued

a Secretarial Letter referring the matter to the OALJ for further proceedings. A prehearing conference was scheduled for September 17, 2012.

**II. Service List:** Citizen Power respectfully requests that its entry on the service list should be for its counsel, as follows:

Theodore Robinson  
Staff Attorney  
Citizen Power  
2121 Murray Avenue  
Pittsburgh, PA 15217

Counsel consents to the service of documents by electronic mail to [robinson@citizenpower.com](mailto:robinson@citizenpower.com), as provided in 52 Pa. Code § 1.54(b)(3).

**III. Settlement:** Citizen Power recognizes the potential savings for the Court and the Parties that can be achieved through settlement. Citizen Power is amenable to settlement discussions and the possibility of reaching a settlement in this matter.

**IV. Schedule and Discovery Rules:** Citizen Power has reviewed the proposed procedural schedule and is prepared to collaborate with Judge Dunderdale and all other parties at the Prehearing Conference to develop a reasonable schedule and any necessary modifications to the Commission's discovery rules.

**V. Witnesses:** At this time, Citizen Power is still investigating the issues and has not decided whether they will offer testimony in this matter. If it is determined that Citizen Power

will be calling a witness, Judge Dunderdale and other parties will be notified as soon as the witness is identified.

**VI. Issues:** Citizen Power is in the process of reviewing the filing and testimony submitted by the Duquesne Light Company. Currently, Citizen Power has identified the issues of the cost of implementing the Plan, the data security of the AMI, the operational security of the AMI, the ability of the proposed system to support programs that can be bid into PJM's forward capacity market, and the ability of the proposed system to save energy through voltage reduction. At this time, Citizen Power continues to evaluate its position on the filing and will refine its position based upon further study of the plan, review of discovery, and additional input from other parties. Petitioner reserves the right to raise other issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties.

Respectfully Submitted,

By: 

Theodore S. Robinson (PA Bar # 203852)

Citizen Power

2121 Murray Avenue

Pittsburgh, PA 15217

(412) 421-7029 (phone)

Dated September 14, 2012

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for :  
Approval of its Smart Meter Technology : Docket No. M-2009-2123948  
Procurement and Installation Plan :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Prehearing Memorandum of Citizen Power, Inc. upon the participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant).

**VIA FIRST CLASS MAIL**

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Pennsylvania Public Utility Commission  
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Dated this 14<sup>th</sup> day of September, 2012

By: 

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