

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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

Pursuant to Section 333 of the Public Utility Cod, 66 Pa.C.S. § 333, and in response to the August 19, 2009 prehearing conference order issued in the above-captioned matter, Citizen Power, Inc. (“Citizen Power”) provides the following information:

**I. INTRODUCTION**

On November 14, 2008, Act 129 (“the Act”) of 2008 became law. The Act requires that electric distribution companies file with the Pennsylvania Public Utility Commission (“Commission”) a smart meter technology procurement and installation plan. 66 Pa.C.S. § 2807(f)(1).

On March 30, 2009, the Commission issued a Secretarial Letter seeking comments on a draft Implementation Order and also asked for responses to additional questions related to the Commission’s smart meter procurement and installation program at Docket No. M-2009-2092655. On April 15, 2009, Citizen Power provided written comments concerning a host of smart meter issues including data security, customer access to information, interconnectivity between the meter and other household equipment, data estimation rules, accelerated smart meter deployment, and the need to minimize smart meter deployment costs. In addition, Citizen Power participated in Duquesne Light’s collaborative meetings on April 3<sup>rd</sup> and April 23<sup>rd</sup> regarding their EE&C Plans.

On June 24, 2009, the Commission issued a Smart Meter Procurement and Installation Order (“Implementation Order”) at Docket No. M-2009-2092655 regarding smart meter plan requirements. On August 14, 2009, Duquesne Light filed its Petition for Approval of its Smart Meter Procurement and Installation Plan (“Plan”) with the Commission pursuant to the Implementation Order at Docket No. M-2009-2092655. Duquesne Light’s Plan requests that the costs of the Plan be recovered through a Smart Meter Charge (“SMC”). Citizen Power filed its Petition to Intervene on September 25, 2009.

## **II. ISSUES**

Citizen Power is a non-profit, 501(c)(3), public policy research, education and advocacy organization with a focus on consumer and environmental protection. The initial list of issues that we have identified are:

1. The security of consumer information generated through the implementation of Duquesne’s proposed Smart Meter Plan.
2. The allocation of Smart Meter Plan costs through the proposed Rider No. 20 may not assign the costs to each customer class in a manner reflecting the benefits gained by each class.
3. The likelihood that Duquesne will achieve meaningful additional operational savings by replacing the existing AMR system with smart meter technology. Specifically, the calculation of term “S” in the proposed Rider No. 20.
4. The estimated Smart Meter Plan costs may not be reasonable in meeting the Act 129 requirements.

5. The proposed Rider No. 20 may disproportionately affect some populations and may lead to greater electricity consumption than if costs were recovered on a per kwh basis.

### **III. WITNESSES**

At this time, Citizen Power has not decided whether they will offer testimony in this matter.

### **IV. SERVICE**

All documents and correspondence related to this proceeding should be addressed to:

Theodore S. Robinson  
Staff Attorney  
Citizen Power  
2121 Murray Avenue  
Pittsburgh, PA 15217  
(412) 421-7029 (phone)  
(412) 412-6162 (fax)  
[robinson@citizenpower.com](mailto:robinson@citizenpower.com)

Respectfully Submitted,

Citizen Power, Inc.

By: /s/ Theodore S. Robinson  
Theodore S. Robinson (PA Bar # 203852)  
Citizen Power  
2121 Murray Avenue  
Pittsburgh, PA 15217  
(412) 421-7029 (phone)  
(412) 412-6162 (fax)

Dated: October 6, 2009

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Prehearing Memorandum of Citizen Power, Inc. upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner an upon the persons listed below:

Dated this 6<sup>th</sup> day of October, 2009.

SERVICE BY E-MAIL and FIRST CLASS MAIL

Gary A Jack  
Assistant General Counsel  
Duquesne Light  
16<sup>th</sup> Floor  
411 Seventh Avenue  
Pittsburgh, PA 15219  
Counsel for: *Duquesne Light Company*

Pamela Polacek, Esquire  
Shelby A. Linton-Keddie, Esquire  
Barry A. Naum, Esquire  
McNees Wallace & Nurick, LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
Counsel for: *Duquesne Industrial  
Intervenors*

Sharon E. Webb  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Commerce Building, Suite 1102  
300 North Second Street  
Harrisburg, PA 17101  
Counsel for: *Office of Small Business Advocate*

George Jugovic, Assistant Counsel  
Commonwealth of Pennsylvania  
Department of Environmental Protection  
400 Waterfront Drive  
Pittsburgh, PA 15222-4745  
Counsel for: *Department of Environmental Protection*

Scott Perry, Assistant Counsel  
Aspassia V. Staevska, Assistant Counsel  
Commonwealth of Pennsylvania  
Department of Environmental Protection  
RCSOB, 9<sup>th</sup> Floor  
400 Market Street  
Harrisburg, PA 17101-2301  
Counsel for: *Department of Environmental Protection*

David T. Evrard, Assistant Consumer Advocate  
Tanya J. McCloskey, Senior Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Counsel for: *Office of Consumer Advocate*

Harry S. Geller, Esquire  
John C. Gerhard, Esquire  
Julie George, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101-1414  
Counsel for: *Pennsylvania Association of Community Organizations for Reform Now*

Christopher A. Lewis, Esquire  
Christopher R. Sharp, Esquire  
Melanie J. Tambolas, Esquire  
Blank Rome LLP  
One Logan Square  
Philadelphia, PA 19103  
Counsel for: *Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc.*

Divesh Gupta  
Constellation NewEnergy  
111 Market Place  
Suite 500  
Baltimore, MD 21202  
Counsel for: *Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc.*

Administrative Law Judge Robert P.  
Meehan  
1103 Pittsburgh State Office Building  
300 Liberty Avenue  
Pittsburgh, PA 15222

By: /s/ Theodore S. Robinson  
Theodore S. Robinson (PA Bar #203852)  
Citizen Power  
2121 Murray Avenue  
Pittsburgh, PA 15217  
(412) 421-7029 (phone)  
(412) 412-6162 (fax)