

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY
Consumer Advocate

September 1, 2009

James J. McNulty
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Joint Petition of Metropolitan Edison
Company, Pennsylvania Electric Company
and Pennsylvania Power Company for
Approval of Smart Meter Technology
Procurement and Installation Plan
Docket No. M-2009-2123950

Dear Secretary McNulty:

Enclosed for filing is the Notice of Intervention and Public Statement of the Office of
Consumer Advocate, in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Candis A. Tunilo".

Candis A. Tunilo
Assistant Consumer Advocate
PA Attorney I.D. # 89891

Enclosures

cc: Honorable Susan D. Colwell
Office of Special Assistants

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition of Metropolitan Edison :
Company, Pennsylvania Electric Company :
and Pennsylvania Power Company for : Docket No. M-2009-2123950
Approval of Smart Meter Technology :
Procurement and Installation Plan :

NOTICE OF INTERVENTION

Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

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Respectfully submitted,



Candis A. Tunilo
Assistant Consumer Advocate
PA Attorney I.D. # 89891

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to intervene and participate in the Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company for Approval of Smart Meter Technology Procurement and Installation Plan (Smart Meter Plan).

On August 14, 2009, Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company (FirstEnergy or Companies) filed their Smart Meter Plan with the Commission pursuant to Section 2807(f)(1) of the Public Utility Code, 66 Pa.C.S. § 2807(f)(1), and pursuant to the Commission's Implementation Order entered at Docket No. M-2009-2092655 on June 24, 2009. In their Joint Petition in this matter, the Companies seek approval of their Smart Meter Plan, which outlines the Companies' strategies and programs to implement and deploy smart meters to their customers, and authorization to implement a proposed tariff rider, a Smart Meter Technology Charge Rider, for cost recovery purposes. The Companies have coordinated their efforts to develop an efficient and consistent Smart Meter Plan for implementation across the FirstEnergy Companies' service territories, and therefore, the Companies have submitted one Smart Meter Plan to the Commission for consideration.

The Consumer Advocate determined to intervene in this proceeding to protect the interests of FirstEnergy's customers; to ensure that the proposed Smart Meter Plan is in accordance with the Public Utility Code, regulations, and case law; and to ensure that any increase in rates resulting from adoption of the proposed Smart Meter Plan is just and reasonable.

CERTIFICATE OF SERVICE

Joint Petition of Metropolitan Edison :
Company, Pennsylvania Electric Company :
and Pennsylvania Power Company for : Docket No. M-2009-2123950
Approval of Smart Meter Technology :
Procurement and Installation Plan :

I hereby certify that I have this day served a true copy of the foregoing document, Notice of Intervention and Public Statement of the Office of Consumer Advocate, 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 and upon the persons listed below:

Dated this 1st day of September, 2009.

SERVICE BY E-MAIL and INTEROFFICE MAIL

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