

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY
Consumer Advocate

July 6, 2010

Rosemary Chiavetta
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 Chiavetta:

Enclosed for filing is the Answer of the Office of Consumer Advocate to the
FirstEnergy Companies' Petition for Reconsideration.

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

Respectfully Submitted,

Handwritten signature of Candis A. Tunilo in cursive.

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	:	

ANSWER OF THE OFFICE OF CONSUMER ADVOCATE TO THE FIRSTENERGY
COMPANIES' PETITION FOR RECONSIDERATION

On June 24, 2010, Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company (collectively FirstEnergy Companies) filed a Petition for Reconsideration of the Commission's Order entered June 9, 2010, approving the FirstEnergy Companies' smart meter implementation plans with modifications. In their Petition, the FirstEnergy Companies request that the Commission delete the second paragraph on page 21 and Ordering Paragraph 12 on page 55 of the Commission's Order entered June 9, 2010.

The second paragraph of page 21 and Ordering Paragraph 12 are nearly identical, stating:

Although no Party addressed this point, we begin by noting that all Plan costs, including both expenses and capital items (net of tax) and revenues included in the Companies' smart meter revenues, will not be included in the revenue requirement used in future distribution base rate cases and will be subject to Commission review and audit.

Order at 21, ¶ 2. In their Petition, the FirstEnergy Companies request that the Commission reserve judgment on this issue and not address it unless and until the Companies present a roll-in request in the future base rate case.

The Office of Consumer Advocate (OCA) supports the relief requested in the FirstEnergy Companies' Petition for Reconsideration. The OCA agrees that the potential roll-in of the smart

meter charges to base rates should not be precluded nor addressed until there is a proposal presented.

Respectfully Submitted,



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Dated: July 6, 2010
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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, the Answer 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 6th day of July 2010.

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