

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY  
Consumer Advocate

January 20, 2011

Rosemary Chiavetta  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

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 is the Answer 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 "David T. Evrard".

David T. Evrard  
Assistant Consumer Advocate  
PA Attorney I.D. # 33870

Enclosures

cc: Administrative Law Judge  
Office of Special Assistants

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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	:		

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ANSWER OF THE  
OFFICE OF CONSUMER ADVOCATE

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I. INTRODUCTION

On December 30, 2010, Duquesne Light Company (Duquesne or Company) filed with the Public Utility Commission, in the above-captioned Docket, an application seeking approval of its Advanced Metering Infrastructure (AMI) Assessment of Needs, Technology Solutions and Vendor Selection (Assessment), as part of its overall Smart Meter Procurement and Installation (SMPI) Plan. Duquesne's Assessment reviews the communications and network infrastructure requirements of the Company's proposed AMI system. It details the process put in place to select the technology and vendor to be used in deploying the system, and it provides an overview of the technology solution proposed by its "shortlisted" vendors. Significantly, Duquesne's Application and the Assessment indicate that vendor selection has not been finalized because complete system costs are still being evaluated. Duquesne states that it will supplement the instant filing with a filing on January 31, 2011 in which it will provide system cost information and will identify Duquesne's chosen AMI vendor.

## II. ANSWER

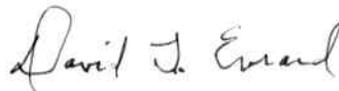
The Office of Consumer Advocate (OCA) does not object to Duquesne's Assessment as filed. However, as noted, the filing is not complete and further information is to be filed on January 31. Accordingly, the OCA reserves the right to supplement its Answer based on its review of the information filed on January 31.

Further, the OCA wishes to note that, as mentioned in Duquesne's filing, the Company has been able to find a less costly alternative for providing smart meters to customers who wish to have them installed during the Grace Period. This was an issue of concern to the OCA in the original proceedings in this docket to approve Duquesne's underlying SMPI Plan. The Company originally proposed that a customer, including a residential customer, who wanted a smart meter installed during the Grace Period would have to pay an incremental cost of \$1,305. In its Assessment, however, Duquesne reports that it has determined that for a cost of \$300, it can provide an interval meter that is compatible with Duquesne's existing AMR system and can provide customers with interval usage data. While not a fully functioning smart meter, it will provide much of the functionality of a smart meter. The OCA commends Duquesne for working to find a more affordable option for customers.

III. CONCLUSION

Because not all elements of Duquesne's Assessment of Needs, Technology Solutions and Vendor Selection have been filed, the OCA respectfully submits that Commission action on Duquesne's instant Application should be deferred until Duquesne makes its supplemental filing on January 31, 2011 and interested parties have had the opportunity to review and respond to any issues or concerns raised by the supplemental filing.

Respectfully Submitted,



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Dated: January 20, 2011

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CERTIFICATE OF SERVICE

Petition of Duquesne Light Company for :  
Approval of its Smart Meter Technology : Docket No. M-2009-2123948  
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 20<sup>th</sup> day of January 2011.

SERVICE BY E-MAIL and INTEROFFICE MAIL

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