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March 11, 2011

**VIA HAND DELIVERY**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, Pa 17120

Re: Petition of West Penn Power Company for Expedited Approval of its Smart Meter  
Technology and Installation Plan,  
Docket No. M-2009-2123951

Dear Secretary Chiavetta:

Enclosed for filing is an original and three (3) copies of a Motion to Admit Testimony  
from West Penn Power Company in the above-captioned proceeding.

Copies of this filing have been served on all parties to this case as indicated in the  
attached Certificate of Service. Thank you for your attention to this matter.

Very truly yours,



W. Edwin Ogden

Enclosures

cc: Certificate of Service  
The Honorable Mark A. Hoyer

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of West Penn Power Company :  
for Expedited Approval of its Smart : Docket No. M-2009-2123951  
Meter Technology Procurement and :  
Installation Plan :

**MOTION TO ADMIT WRITTEN TESTIMONY  
IN SUPPORT OF SETTLEMENT**

TO THE HONORABLE MARK A. HOYER, ADMINISTRATIVE LAW JUDGE:

1. On March 9, 2011, West Penn Power Company ("Company"), the Office of Consumer Advocate and the Office of Trial Staff ("Joint Petitioners") submitted, and requested approval of, an Amended Joint Petition for Settlement ("Settlement").

2. In conjunction with the Settlement, the Company and the Office of Small Business Advocate also submitted a Joint Stipulation ("Joint Stipulation").

3. The Company also submitted supporting written testimony, as follows:

- WPPC Statement No. 1-S, Testimony of John C. Ahr, and WPPC Exhibits 1-S and 2-S; and,
- WPPC Statement No. 2-S, Testimony of Raymond E. Valdes.

4. A further conference before Administrative Law Judge Hoyer was held on March 10, 2011.

5. This Motion is being filed in accordance with the further procedural steps outlined at that conference.

6. The Company's further written testimony and exhibits, as identified in paragraph 3, above, support the Settlement and the Joint Stipulation.

WHEREFORE, West Penn Power Company, by its counsel, hereby respectfully moves for the admission of the foregoing testimony and exhibits into evidence in this proceeding.

Dated: March 11, 2011

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John F. Povilaitis', written over a horizontal line.

John F. Povilaitis, Esq.  
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On behalf of West Penn Power Company

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of West Penn Power Company :  
for Expedited Approval of its Smart : Docket No. M-2009-2123951  
Meter Technology and Installation Plan :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing document in accordance with the requirements of 52 Pa. Code § 1.54 et seq. (relating to service by a participant).

**VIA FIRST CLASS AND  
ELECTRONIC MAIL**

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Date: March 11, 2011



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