

CITIZEN POWER

Public Policy Research Education and Advocacy

July 23, 2012

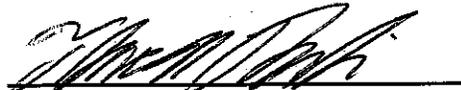
Rosemary Chiavetta, Secretary
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of Duquesne Light Company for Approval of its Smart Meter Technology Procurement and Installation Plan Docket No. M-2009-2123948 and P-2012-

Dear Secretary Chiavetta:

Enclosed for filing with the Commission on behalf of Citizen Power, Inc. is the Answer of Citizen Power in the above-captioned proceeding. Copies of this document have been served in accordance with the attached Certificate of Service.

Sincerely,



Theodore Robinson
Counsel for Citizen Power

Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :
for Approval of its Smart Meter : **Docket No. P-2012-**
Procurement and Installation Plan : **M-2009-2123948**

ANSWER OF CITIZEN POWER, INC.

I. INTRODUCTION

On June 29, 2012, Duquesne Light Company (“Duquesne”) filed with the Public Utility Commission their Final Smart Meter Technology Procurement and Installation Plan (“Final Plan”) and supporting Direct Testimony. These materials detail the technologies chosen for the advanced meter infrastructure: a proposed roll out schedule of the smart meter technology; the capabilities of the smart meter system; the estimated total costs of the smart meter program; the recovery of smart meter costs through the existing Smart Meter Charge; the plan for meeting the new construction and customer request elements of the Commission’s June 18, 2009 Smart Meter Implementation Order (“Implementation Order”); a proposed customer education and outreach approach; and risk mitigation strategies.

II. ANSWER

Duquesne’s Final Plan outlines a plan to complete a complex and costly infrastructure upgrade. Citizen Power believes that an endeavor of this magnitude requires further analysis. Specifically, we aver that it needs to be determined whether the Final Plan complies with Act

129 and the Implementation Order, whether the proposed selection of additional capabilities is prudent, and whether the estimated budget represents the most efficient means of achieving the proposed functionality. In our view, the estimated budget of \$238 million is of particular concern because it is on the high end of the previous estimate of between \$125 and \$240 million found in Duquesne's Supplement to the Application of Approval of Duquesne Light's Assessment of Needs, Technology Solutions and Vendor Selection filed January 31, 2011 in Docket No. M-2009-2123948.

III. CONCLUSION

Citizen Power respectfully requests that the Pennsylvania Public Utility Commission refer Duquesne Light Company's Final Smart Meter Technology Procurement and Installation Plan to the Office of Administrative Law Judge in order to initiate proceedings.

Respectfully Submitted,



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Dated: July 23, 2012

**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 : **P-2012-**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Answer of Citizen Power, Inc. upon the participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

Dated this 23rd day of July, 2012.

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