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RHOADS & SINON LLP

File No. 11304/00

March 22, 2013

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket No. M-2009-2123944 – Petition of PECO Energy Company for
Approval of its Smart Meter Universal Deployment Plan**

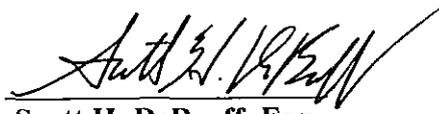
Dear Secretary Chiavetta:

Enclosed herewith please find an original copy of the "Prehearing Memorandum on Behalf of Sensus Metering Systems". Please enter this into the docket.

Should you have any questions, please do not hesitate to contact me at (717) 237-6716.

Sincerely,

RHOADS & SINON LLP

By: 

Scott H. DeBroff, Esq.

Enclosures

cc: Docket No. M-2009-2123944 Service List

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COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PECO ENERGY
COMPANY FOR APPROVAL OF ITS
SMART METER UNIVERSAL
DEPLOYMENT PLAN

DOCKET No. M-2009-2123944

PREHEARING MEMORANDUM ON BEHALF OF
SENSUS METERING SYSTEMS

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DATED: MARCH 22, 2013

COUNSEL FOR SENSUS METERING SYSTEMS

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SENSUS METERING SYSTEMS

AND NOW COMES, **Sensus Metering Systems** ("Sensus"), by and through its counsel, **Scott H. DeBroff, Esquire** and **Alicia R. Duke, Esquire** of Rhoads & Sinon LLP, for the purpose of this "Prehearing Memorandum" with respect to this proceeding before the Commonwealth of Pennsylvania Public Utility Commission ("PUC" or the "Commission"). In support of this docket, Sensus avers the following:

I. **History of the Proceeding**

On August 14, 2009, consistent with the requirements of Act 129 and the Commission's Implementation Order entered June 24, 2009, at Docket No. M-2009-2092655 ("I.O."), PECO Energy Company ("PECO" or "Company") filed its Smart Meter Technology Procurement and Installation Plan ("Initial Smart Meter Plan"). The Initial Smart Meter Plan proposed procurement and deployment of 100,000 smart meters over 30 months and bifurcated PECO's smart meter installations into the 30-month "grace" period and a subsequent universal

deployment plan to be completed by 2019. By Orders entered May 6, 2010, and June 3, 2012, the Commission approved PECO's Initial Smart Meter Plan, with modifications.

On January 18, 2013, consistent with the bifurcated deployment approved through the Initial Smart Meter Plan, PECO filed its Smart Meter Universal Deployment Plan ("Universal Deployment Plan"). The Universal Deployment Plan summarizes PECO's performance through the Initial Smart Meter Plan and outlines the projected benchmarks for universal deployment. PECO anticipates deployment of approximately 600,000 smart meters at the conclusion of the Initial Smart Meter Plan. PECO further proposes to significantly accelerate the original 2019 benchmark for universal deployment and complete full-scale deployment of an additional 1.2 million smart meters by the end of 2014.

On March 22, 2013, Sensus filed a Petition to Intervene in this proceeding.

II. Anticipated Issues and Sub-Issues

Sensus is at this time still formulating its position on the substantive issues presented by the Application. Due to the early stage of the proceeding, Sensus reserves the right to finalize its position after it has had an opportunity to further evaluate PECO's filings, conduct discovery and review additional information that may be provided, and to raise and/or address additional issues that may be identified by other parties.

III. Proposed Witnesses

Sensus reserves the right to submit Direct, Rebuttal, and Surrebuttal Testimony regarding all of the issues raised by PECO's Petition, including, but not limited to, the issues identified in the Petition to Intervene filed by Sensus and the other intervening parties in this proceeding.

At this time, Sensus has not identified any witnesses, the designation of which will depend on the complete list of issues and sub-issues Sensus identifies, as well as the hearing dates scheduled in this proceeding.

IV. Proposed Schedule and Discovery Rules

Sensus is willing to participate in discussions with PECO and other parties to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations.

V. Settlement

Sensus is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

By: 

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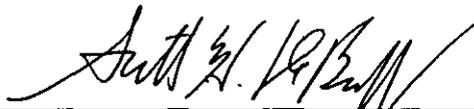
DOCKET NO. M-2009-2123944

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "PREHEARING MEMORANDUM ON BEHALF OF SENSUS METERING SYSTEMS" was served on the Commonwealth of Pennsylvania Public Utility Commission along with the service list on this 22th day of March, 2013.

Dated: March 22, 2013

By:



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