

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities** :  
**Corporation for Approval of Its Smart** : **Docket No. M-2014-2430781**  
**Meter Technology Procurement and** : **M-2009-2123945**  
**Installation Plan** :

**ANSWER OF THE  
OFFICE OF SMALL BUSINESS ADVOCATE**

Pursuant to the notice published in the *Pennsylvania Bulletin* on July 19, 2014, the Office of Small Business Advocate (“OSBA”) submits this Answer to the Petition of PPL Electric Utilities Corporation (“PPL” or the “Company”) for Approval of Its Smart Meter Technology Procurement and Installation Plan (“*Petition*”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on June 30, 2014.

**Responses to the *Petition’s* Numbered Paragraphs**

Introduction

1. Admitted.
2. Admitted.
3. The averments of Paragraph 3 contain conclusions of law to which no response is required. By way of further response, Act 129 of 2008 (“Act 129”) speaks for itself.
4. The averments of Paragraph 4 contain conclusions of law to which no response is required. By way of further response, the Commission’s *Smart Meter Procurement and Installation*, Docket No. M-2009-2092655 (Order entered June 24, 2009) (“*Implementation Order*”) cited in Paragraph 4 speaks for itself.

5. The averments of Paragraph 5 contain conclusions of law to which no response is required. The remaining averments are denied, and strict proof thereof is demanded.

6. The averments of Paragraph 6 contain conclusions of law to which no response is required. By way of further response, the June 24, 2010, Commission Order cited in Paragraph 6 speaks for itself.

7. The averments of Paragraph 7 are denied, and strict proof thereof is demanded.

8. The averments of Paragraph 8 contain conclusions of law to which no response is required. By way of further response, the August 2, 2012, Commission Order cited in Paragraph 8 speaks for itself.

PPL Electric's Existing Metering System Must Be Replaced

9. The averments of Paragraph 9 contain conclusions of law to which no response is required. By way of further response, Act 129 and the Commission Orders cited in Paragraph 9 speak for themselves.

10. The averments of Paragraph 10 are denied, and strict proof thereof is demanded. By way of further response, the Commission Order cited in Paragraph 10 speaks for itself.

11. The averments of Paragraph 11 are denied, and strict proof thereof is demanded. By way of further response, Act 129 speaks for itself.

12. The averments of Paragraph 12 are denied, and strict proof thereof is demanded. By way of further response, Act 129 speaks for itself.

13. The averments of Paragraph 13 are denied, and strict proof thereof is demanded.

14. The averments of Paragraph 14 are denied, and strict proof thereof is demanded.

15. The averments of Paragraph 15 are requests for relief to which no response is required.

Technology Assessment

16. The averments of Paragraph 16 are denied, and strict proof thereof is demanded.

17. The averments of Paragraph 17 are denied, and strict proof thereof is demanded.

18. The averments of Paragraph 18 are denied, and strict proof thereof is demanded.

19. The averments of Paragraph 19 are denied, and strict proof thereof is demanded.

By way of further response, Act 129 and the Commission Order cited in Paragraph 19 speak for themselves.

20. The averments of Paragraph 20 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

21. The averments of Paragraph 21 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

22. The averments of Paragraph 22 are denied, and strict proof thereof is demanded.

By way of further response, Act 129 speaks for itself.

23. The averments of Paragraph 23 are denied, and strict proof thereof is demanded.

24. The averments of Paragraph 24 are requests for relief to which no response is required.

25. The averments of Paragraph 25 are denied, and strict proof thereof is demanded.

26. The averments of Paragraph 26 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

Smart Meter Capabilities

27. The averments of Paragraph 27 are requests for relief or conclusions of law to which no response is required. By way of further response, the Commission Orders cited in Paragraph 27 speak for themselves.

Bidirectional Data Communications

28. The averments of Paragraph 28 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

Recording Usage Data on at Least an Hourly Basis Once per Day

29. The averments of Paragraph 29 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

Providing Customers with Direct Access to and use of Price and Consumption Info

30. The averments of Paragraph 30 are denied, except for those averments that are requests for relief to which no response is required.

31. The averments of Paragraph 31 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

Providing Customers with Information on their Hourly Consumption

32. Denied.

Enabling TOU rates and RTP Options

33. The averments of Paragraph 33 are denied, except for those averments that are requests for relief to which no response is required.

Supporting the Automatic Control of the Customers' Electric Consumption

34. The averments of Paragraph 34 are denied, except for those averments that are requests for relief to which no response is required.

Ability to Remotely Connect and Disconnect

35. The averments of Paragraph 35 are denied, except for those averments that are requests for relief to which no response is required.

Ability to Provide 15-Minute or Shorter Interval Data

36. The averments of Paragraph 36 are denied, and strict proof thereof is demanded.

37. The averments of Paragraph 37 are denied, except for those averments that are requests for relief to which no response is required.

On-Board Meter Storage of Meter Data that Complies with National Standards

38. The averments of Paragraph 38 are denied, except for those averments that are requests for relief to which no response is required.

Open Standards and Protocols

39. The averments of Paragraph 39 are denied, except for those averments that are requests for relief to which no response is required.

Ability to Upgrade These Minimum Capabilities as Technology Advances

40. The averments of Paragraph 40 are denied, except for those averments that are requests for relief to which no response is required.

Ability to Monitor Voltage at Each Meter and Report Data

41. The averments of Paragraph 41 are denied, except for those averments that are requests for relief to which no response is required.

Ability to Remotely Program the Meter

42. The averments of Paragraph 42 are denied, except for those averments that are requests for relief to which no response is required.

Ability to Communicate Outages and Restorations

43. The averments of Paragraph 43 are denied, except for those averments that are requests for relief to which no response is required.

Ability to Support Net Metering of Customer-Generators

44. The averments of Paragraph 44 are denied, except for those averments that are requests for relief to which no response is required.

Utilization of Smart Meter Data for Bill Ready and Dual Billing

45. The averments of Paragraph 45 are denied, and strict proof thereof is demanded.

Providing at least 12 Months of Account or Meter Level History Usage Data

46. The averments of Paragraph 46 are denied, and strict proof thereof is demanded.

Participation in an EDEWG Working Group

47. The averments of Paragraph 47 are denied, and strict proof thereof is demanded.

Providing a Plan to Support Meter Level Hourly Interval usage Data

48. The averments of Paragraph 48 are denied, and strict proof thereof is demanded.

Vendor Selection

49. The averments of Paragraph 49 are requests for relief to which no response is required.

50. The averments of Paragraph 50 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

51. The averments of Paragraph 51 are requests for relief to which no response is required.

Implementation Plan

52. The averments of Paragraph 52 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

53. The averments of Paragraph 53 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

54. The averments of Paragraph 54 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

55. The averments of Paragraph 55 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

Cybersecurity and Data Privacy

56. The averments of Paragraph 56 are denied, except for those averments that are requests for relief to which no response is required.

57. The averments of Paragraph 57 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

### Organizational Impacts

58. The averments of Paragraph 58 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

59. The averments of Paragraph 59 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

### Program Risks

60. The averments of Paragraph 60 are denied, except for those averments that are requests for relief to which no response is required.

61. The averments of Paragraph 61 are denied, except for those averments that are requests for relief to which no response is required.

62. The averments of Paragraph 62 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

### Program Benefits

63. The averments of Paragraph 63 are denied, and strict proof thereof is demanded.

64. The averments of Paragraph 64 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

65. The averments of Paragraph 65 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

66. The averments of Paragraph 66 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

67. The averments of Paragraph 67 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

SMP Costs

68. The averments of Paragraph 68 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

69. The averments of Paragraph 69 are requests for relief to which no response is required.

SMP Cost Recovery

70. Admitted.

71. The averments of Paragraph 71 are requests for relief to which no response is required.

72. The averments of Paragraph 72 are requests for relief to which no response is required.

73. The averments of Paragraph 73 are requests for relief to which no response is required. By way of further response, 66 Pa. C.S. § 1307(e) speaks for itself.

74. The averments of Paragraph 74 are requests for relief to which no response is required.

### Customer Education and Outreach

75. The averments of Paragraph 75 are requests for relief or conclusions of law to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

76. The averments of Paragraph 76 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

### Post Grace Period Deployment for new Construction and Customer Requests

77. The averments of Paragraph 77 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

78. The averments of Paragraph 78 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

79. Admitted.

80. The averments of Paragraph 80 are requests for relief or conclusions of law to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

### Unrecovered Costs of Assets to be Replaced

81. The averments of Paragraph 81 are denied, and strict proof thereof is demanded.

82. The averments of Paragraph 82 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

83. The averments of Paragraph 83 are requests for relief to which no response is required.

Meter Testing

84. The averments of Paragraph 84 are requests for relief or conclusions of law to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded. By way of further response, 52 Pa. Code § 57.20(e) speaks for itself.

85. The averments of Paragraph 85 are requests for relief or conclusions of law to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded. By way of further response, 52 Pa. Code § 57.20(h) and the Commission Order cited in Paragraph 85 speak for themselves.

86. The averments of Paragraph 86 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

**Conclusion**

In view of the foregoing, the Office of Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

A. Direct the Office of Administrative Law Judge to hold hearings on the *Petition* and prepare an initial decision;

B. Deny the Company's request for the entry of a Commission Order by December 31, 2014. As set forth in Paragraph 8, PPL could have filed this *Petition* as early as August 3, 2012, and as late as June 30, 2014. The *Petition* proposes a complex and costly metering program. The parties, the Administrative Law Judge, and the Commission should be afforded ample time to review and litigate this matter. Expedited treatment for a party that delayed a complex filing until the last minute should *not* be afforded when due process rights will be so thoroughly decimated as a result; and

C. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

  
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