

**Lauren M. Lepkoski**  
717.237.4841  
lauren.lepkoski@bipc.com

17 North Second Street, 15th Floor  
Harrisburg, PA 17101-1503  
T (717) 237-4800  
F (717) 233-0852  
www.buchananingersoll.com

April 25, 2012

**VIA E-FILING**

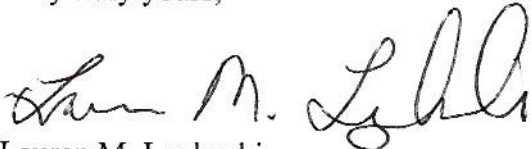
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, Pennsylvania 17120

Re: Connie McRoberts v. Pennsylvania Power Company  
Docket No. C-2012-2281317

Dear Secretary Chiavetta:

On behalf of Pennsylvania Power Company, I have enclosed for electronic filing the Affidavit of Raymond E. Valdes in Support of Pennsylvania Power Company's Motion for Summary Judgment with regard to the above-captioned matter which was inadvertently omitted from the electronic filing of the Motion for Summary Judgment. Copies have been served on all parties as indicated in the attached certificate of service.

Very truly yours,

  
Lauren M. Lepkoski

LML/kra  
Enclosure

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CONNIE MCROBERTS	:	
	:	
v.	:	Docket No. C-2012-2281317
	:	
PENNSYLVANIA POWER COMPANY	:	
	:	

**AFFIDAVIT OF RAYMOND E. VALDES IN SUPPORT OF  
PENNSYLVANIA POWER COMPANY'S MOTION FOR SUMMARY  
JUDGMENT**

I, Raymond E. Valdes, being duly sworn according to law, deposes and says the following:

1. My name is Raymond E. Valdes, and my business address is 800 Cabin Hill Drive, Greensburg, PA 15601.

2. I am employed by FirstEnergy Services Company which is a business unit within FirstEnergy Corporation, the parent company to Pennsylvania Power Company ("Penn Power" or "Company"), as an Advisor within the Rates and Regulatory Affairs Department.

3. As an Advisor, I am responsible for the development, coordination, preparation and presentation of retail tariffs; the development of retail electric rates, rules and regulations; the development and preparation of certain accounting and financial data; and the development and preparation of certain reports to the Pennsylvania Public Utility Commission ("Commission").

4. The Company currently provides retail electric service to Connie McRoberts ("Complainant") at 369 Enon Road, Enon Valley, Pennsylvania 16120 ("Service Location") at Account No. 110005625501 ("Account").

5. On August 14, 2009, Penn Power, along with the Company's affiliates, Metropolitan Edison Company and Pennsylvania Electric Company, filed with the Commission a Joint Petition for Approval of Smart Meter Technology Procurement and Installation Plan ("Joint Petition"). *Joint Petition for Approval of Smart Meter Technology Procurement and Installation Plan*, Docket No. M-2009-2123950 (filed August 14, 2009) ("Smart Meter Proceeding").

6. A smart meter is a digital electric meter. It can collect hourly or sub-hourly electricity usage information and send that information to the local utility through a secure communications network. Smart meter technology involves an entire network, which includes, but is not limited to, the smart meter, two-way communication, computer hardware and software, and trained support personnel.

7. The Smart Meter Proceeding was a public proceeding before the Commission in which many parties with varying interests fully evaluated and discussed all issues raised by the installation and recovery of costs for smart meters and smart meter technology.

8. The Complainant did not participate in the Smart Meter Proceeding and, other than filing the Complaint, has never raised or advised the Company of any concerns about smart meters, smart meter technology, or the Smart Meter Proceeding.

9. On June 25, 2010, in compliance with the Commission's Order at M-2009-2123950, Penn Power filed the Smart Meter Technologies Charge Rider to Penn Power's Tariff, Electric Pa.P.U.C. No. 35, to become effective on August 1, 2010.

10. The Complainant has been assessed/charged a Smart Meter Technologies Charge ("SMT-C") for the Account every month beginning with her

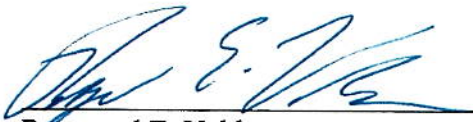
electric service bill for the billing period spanning July 15, 2010 through August 13, 2010.

11. The SMT-C is assessed/charged to all applicable customers in accordance with the prevailing rate specified in Penn Power's Smart Meter Technologies Charge Rider contained in its Commission-approved tariff. Penn Power Tariff, Electric Pa. P.U.C. No. 35, Smart Meter Technologies Charge Rider, Sixth Revised Sheet No. 61.1 - Twelfth Revised Sheet No. 61.4.

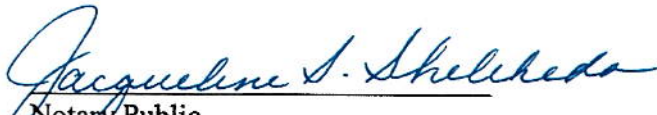
12. The Service Location does not contain a smart meter because the deployment of smart meters has not yet begun for the Company's customers.

13. The Company's deployment of smart meters is expected to begin after the Company files their smart meter deployment plan and Commission approval is received.

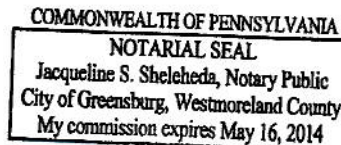
I am authorized to submit this affidavit for and on behalf of Pennsylvania Power Company and represent that the facts set forth herein are true and correct to the best of my knowledge, information and belief.

  
Raymond E. Valdes

Sworn and subscribed before me this 25th  
day of April, 2012.

  
Notary Public

My Commission expires on:



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CONNIE MCROBERTS	:	
	:	
v.	:	Docket No. C-2012-2281317
	:	
PENNSYLVANIA POWER COMPANY	:	

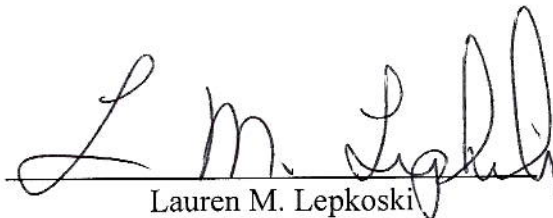
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document on behalf of Pennsylvania Power Company upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Service by First Class Mail, postage prepaid, addressed as follows:

Connie McRoberts  
369 Enon Road  
Enon Valley, Pennsylvania 16120

Dated: April 25, 2012

  
Lauren M. Lepkoski