



COMMONWEALTH OF PENNSYLVANIA

February 14, 2013

E-FILED, E-MAIL, AND HAND DELIVERY

Hon. Elizabeth H. Barnes
Administrative Law Judge
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

**Re: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Their Smart Meter Deployment Plans
Docket Nos. M-2013-2341990, M-2013-2341991, M-2013-2341993, and M-2013-2341994**

Dear Judge Barnes:

Enclosed are two copies of the Prehearing Memorandum, on behalf of the Office of Small Business Advocate, in the above-captioned proceedings.

As evidenced by the enclosed certificate of service, all parties have been served as indicated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Daniel G. Asmus".

Daniel G. Asmus
Assistant Small Business Advocate
Attorney ID No. 83789

Enclosures

cc: Parties of Record

Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison Company,	:	Docket Nos.	M-2013-2341990
Pennsylvania Electric Company, Pennsylvania	:		M-2013-2341991
Power Company and West Penn Power	:		M-2013-2341993
Company for Approval of Their Smart Meter	:		M-2013-2341994
Deployment Plan	:		

**PREHEARING MEMORANDUM
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding. Representing the OSBA in the above-referenced matter is Assistant Small Business Advocate Daniel G. Asmus. Please address all correspondence in this matter as follows:

Daniel G. Asmus
Assistant Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
dasmus@pa.gov

II. FILING BACKGROUND

On December 21, 2012, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (collectively, “the First Energy Companies”) filed a Joint Petition for Approval of their Smart Meter Deployment Plan with the Pennsylvania Public Utility Commission (“Commission”).

The OSBA filed a Notice of Intervention and Public Statement in the above-captioned proceeding on February 14, 2013.

III. IDENTIFICATION OF WITNESSES AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
(617) 354-0463 – Fax
rdk@indecon.com

The OSBA will participate in this proceeding to assure that the interests of small business customers are adequately represented and protected.

After an initial review of the materials submitted by the First Energy Companies, the OSBA has identified the following list of issues that it will evaluate in this proceeding, subject to time and budget constraints:

1. Whether the costs that the Companies seek to recover are “reasonable and prudent,” as required by Section 2807(f)(7) of the Public Utility Code, 66 Pa. C.S. §2807(f)(7);

2. Whether the overall plan cost will reflect "operating and capital cost savings," as required by Section §2807(f)(7);

3. Whether the proposed cost recovery is likely to result in an appropriate recovery of costs from Small C&I customers;

4. Whether the costs to be recovered are being properly allocated among the rate classes; and

5. Whether the costs to be recovered are being properly allocated within the Small C&I classes.

The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding.

IV. SERVICE OF DOCUMENTS

The OSBA requests that all parties serve a hard copy of any document filed upon the OSBA and the OSBA witness identified above. In addition to hard copies of pleadings and briefs, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. Service by electronic mail only is not acceptable.

V. SETTLEMENT

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of the proceeding.

Respectfully submitted,



Daniel G. Asmus
Assistant Small Business Advocate
Attorney ID #83789

Office of Small Business Advocate
300 North Second Street, Suite 1002
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)

Dated: February 14, 2013

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition for Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of their Smart Meter Deployment Plan	:	Docket Nos. M-2013-2341990, M-2013-2341991, M-2013-2341993, M-3013-2341994
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CERTIFICATE OF SERVICE

I certify that I am serving two copies of the Prehearing Memorandum, on behalf of the Office of Small Business Advocate, by e-filing, e-mail and/or first-class mail (unless otherwise noted) upon the persons addressed below:

Hon. Elizabeth H. Barnes
Administrative Law Judge
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105
(717) 787-1191
(717) 787-0481 (fax)
ebarnes@pa.gov
(E-mail and Hand Delivery)

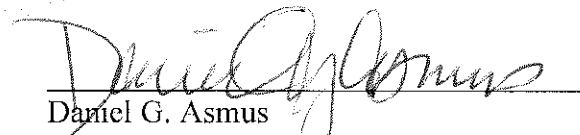
John F. Povilaitis, Esquire
Buchanan Ingersoll & Rooney, PC
409 North Second Street - #500
Harrisburg, PA 17101-1357
(717) 237-4800
(717) 233-0852 (fax)
John.Povilaitis@bipc.com

Daniel Clearfield, Esquire
Deanne O'Dell, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street - 8th Floor
Harrisburg, PA 17101
(717) 237-6000
(717) 237-6019 (fax)
dclearfield@eckertseamans.com
dodell@eckertseamans.com

Tanya J. McCloskey, Esquire
Christy M. Appleby, Esquire
Aron J. Beatty, Esquire
Candis Tunilo, Esquire
Office of Consumer Advocate
555 Walnut Street - 5th Floor
Harrisburg, PA 17101-1923
(717) 783-5048
(717) 783-7152 (fax)
Tmccloskey@paoca.org
cappleby@paoca.org
abeatty@paoca.org
ctunilo@paoca.org
(E-mail and Hand Delivery)

Johnnie E. Simms, Esquire
Richard A. Kanaskie, Esquire
Charles Daniel Shields, Esquire
Carrie B. Wright, Esquire
Bureau of Investigation and Enforcement
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105
(717) 787-1976
(717) 772-2677 (fax)
josimms@pa.gov
rkanaskie@pa.gov
chshields@pa.gov
carwright@pa.gov
(E-mail and Hand Delivery)

Susan E. Bruce, Esquire
Charis Mincavage, Esquire
Vasiliki Karandrikas, Esquire
Teresa K. Schmittberger, Esquire
McNees Wallace & Nurick LLC
P. O. Box 1166
Harrisburg, PA 17108-1166
(717) 232-8000
(717) 237-5300 (fax)
sbruce@mwn.com
cmincavage@mwn.com
ykarandrikas@mwn.com
tschmittberger@mwn.com


Daniel G. Asmus
Assistant Small Business Advocate
Attorney ID No. 83789

Date: February 14, 2013