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August 2, 2013

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA OVERNIGHT MAIL

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

RE: Duquesne Light Company – Smart Meter Procurement and Installation Plan
Docket No.: M-2009-2123948

Dear Secretary Chiavetta:

Duquesne Light Company ("Duquesne Light" or "Company") hereby submits it's Final Smart Meter Procurement and Installation Plan Compliance Filing as required by the Pennsylvania Public Utility Commission ("Commission") Order issued May 6, 2013 in the above referenced docket.

Also, Appendix A to the filing includes responses to the Company's Request for Information ("RFI") and contains information that Duquesne Light considers to be confidential and proprietary information. These pages have been marked **Confidential** and are enclosed in separate envelopes. Duquesne Light requests that the copies of the materials that have been marked **Confidential** and are contained in the **Confidential** envelopes be given confidential treatment by the Commission, including its various offices and bureaus. That is, Duquesne requests that the confidential materials be excluded from the Commission's public document folder and that confidential copies not be disclosed to the public. Duquesne Light will provide the **Confidential** information contained in Appendix A to record parties of this proceeding upon the execution of a confidentiality agreement.

Please do not hesitate to contact me with questions, comments or concerns.

Respectfully submitted,

Tishekia Williams
Senior Counsel, Regulatory

Enclosures
cc: Certificate of Servic

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company	:	
For Approval of Its Final Smart Meter	:	Docket No. M-2009-2123948
Procurement And Installation Plan	:	

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SECRETARY'S BUREAU

DUQUESNE LIGHT COMPANY
SMART METER PROCUREMENT AND INSTALLATION
COMPLIANCE FILING

I. INTRODUCTION

On May 6, 2013, the Pennsylvania Public Utility Commission ("Commission") entered its Opinion and Order ("*May 6 Order*") granting the Petition of Duquesne Light Company ("Duquesne Light" or the "Company") for Approval of its Final Smart Meter Procurement and Installation Plan ("Final Smart Meter Plan") at the above-captioned docket. The Commission directed Duquesne Light to make a compliance filing within 90 days of the *May 6 Order* specifying its proposed changes to settlements and profile processes and providing data supporting whether or not inclusion of the voltage monitoring and communication of outages and restorations capabilities are cost effective.[1] This filing is submitted in compliance with the *May 6 Order*.[2]

In this filing, the Company explains its PJM settlement and profile processes which will use hourly data available through the installation of smart meters to directly assign energy costs to each customer on the Advanced Metering Infrastructure ("AMI") system based on their actual hourly usage. Also, the Company details its approach to implementing advanced outage communications and voltage monitoring capabilities, provides supporting order of magnitude

[1] The *May 6th Order* also discusses 3rd party data access. In compliance with the Commission's December 6, 2012 Smart Meter order issued at Docket No. M-2009-2092655, Duquesne Light filed a Smart Meter Supplement addressing 3rd party data access on April 4, 2013. In that filing, the Company indicated that it is participating fully in the Electronic Data Exchange Working Group (EDEWG) Web-Portal workgroup. The Company's Smart Meter Supplement was accepted by Secretarial Letter issues July 2, 2013.

[2] Interested parties may file comments to this compliance filing within 120 days of the May 6 Order, or September 3, 2013.

cost-benefit data, requests approval to begin implementing an electrical model and develop a more defined roadmap for advanced outage and voltage capabilities and associated cost benefit analysis in 2014.

II. BACKGROUND

1. On June 29, 2012, the Company filed a Petition for Approval of its Final Smart Meter Plan. On December 7, 2012, Duquesne Light and the Office of Consumer Advocate filed an uncontested Joint Petition for Approval of Full Settlement. The Joint Petition proposed to resolve all issues related to the Company's smart meter implementation including deployment schedule and technology solutions.

2. On January 24, 2013, Administrative Law Judge Katrina Dunderdale issued an Initial Decision approving the Joint Petition for Settlement. In its *May 6 Order*, the Commission approved the Final Smart Meter Plan, and required the Company to propose changes to PJM settlements and profile processes to fully enable Time-of-Use ("TOU") rates, and provide data supporting whether or not inclusion of the voltage monitoring and communication of outages and restorations capabilities are cost effective.

III. PJM SETTLEMENT AND TOU PRICING

3. Pursuant to Act 129 of 2008, Duquesne Light is required to deploy "*smart meter technology*" that enables the use of time-of-use ("TOU") rates and real time pricing ("RTP") among other capabilities. 66 Pa. C.S. § 2807(g).

4. In its *May 6 Order*, the Commission correctly noted that in order to fully enable TOU and RTP, Duquesne Light must obtain and use hourly usage data for each customer for purposes of PJM settlement.

5. Under the current processes, the Company uses hourly data that is available for PJM settlement. Presently, hourly data is available for approximately 1,000 commercial and

industrial ("C&I") customers with interval meters. This data is extracted from the MV-90 system and accounts for approximately 48% of the Company's total system load. The Company then uses daily meter read data that is available from its current advanced meter reading ("AMR") system. The meters of all residential customers and the balance of the C&I customers not having interval meters are read through the AMR system. Since hourly meter read data is not available from the AMR system, the Company extracts the daily reads from the AMR system, determines daily kWh consumption, then uses rate class temperature and load profiles to allocate the daily kWh consumption to each hour of the day. For unmetered customers, the Company utilizes calculated average daily kWh consumption based on account type that is allocated to each hour of the day based on the load profile of the applicable rate class (e.g. street lighting customer daily kWh consumption is allocated to applicable street lighting hours of operation).

6. The Company's current use of hourly data and the load profiles for PJM settlement is a function of existing technology limitations. Hourly usage data is not available for all customers using the Company's existing AMR system. The Company will continue to employ the same PJM settlement process currently in effect as smart meters are deployed. The Company will first use hourly data that is available for PJM settlement, then use rate class load and temperature profiles to allocate daily consumption data to each hour of the day for the balance of the load. AMI data will be used immediately upon becoming available. As hourly usage data becomes available for all customers through the installation of the AMI System[3], the balance of the load on the AMR system will decline. Under this process the Company will

[3] The AMI system will consist of four primary components: (1) a Head-End Data Collection System, (2) new ITRON Smart Meters, (3) a Local Area Network that allows smart meters to communicate with other meters and/or collection points throughout the service territory, and (4) a Wide Area Network which is the communication pathway from the collectors/towers located throughout the Company's service territory to the AMI Head-End System.

directly assign energy to each hour of the day for each customer on the AMI system according to their actual usage as recorded by the smart meter. This will enable customers with a smart meter installed on their premise to participate in TOU and RTP programs.

IV. ADVANCED OUTAGE COMMUNICATIONS/ RESTORATION AND VOLTAGE MONITORING

7. In the Commission's Smart Meter Procurement and Installation Implementation Order ("*SM Implementation Order*") electric distribution companies ("EDCs") were directed to install smart meter technology. EDCs were further directed to examine the costs and benefits associated with several functionalities that were not mandated by Act 129, including the ability to communicate outages and restorations, and monitor voltage at each meter and report data in a manner that allows the EDC to react. *Smart Meter Procurement and Installation Implementation Order* entered on June 24, 2009, at Docket No. M-2009-2092655.

8. The Commission further acknowledged that the costs of these added capabilities may exceed benefits they may provide. Accordingly, the Commission reserved the authority to waive the requirement for these capabilities as well as any of the other Commission imposed requirements (that exceeded the minimum requirements imposed by Act 129) upon a finding that the costs exceed the benefits of the capabilities. *Id.* at. 30-31. In its *May 6 Order*, the Commission directed Duquesne Light to provide cost-benefit information to justify whether or not outage communications and voltage monitoring functionality should be implemented.[4]

[4] In the Company's Final Smart Meter Plan, it did not propose to implement advanced outage monitoring and communication and voltage monitoring capabilities. As discussed more fully within, based on information gained from super storm Sandy and further research, the Company believes that the benefits of implementing advanced outage communication and voltage monitoring, both monetary and intangible, potentially warrant implementation.

9. Preliminarily, the Company notes that the benefits that can be achieved from AMI implementation are directly correlated to the existing utility infrastructure and systems in place. The more advanced the existing systems, the less operational benefits may be achieved. Third party support for this position can be found, among other places, in the U.S. Department of Energy (DOE) study entitled "*U.S Department of Energy, Operations and Maintenance Savings from Advanced Metering Infrastructure – Initial Results*" (December 2012). In this study, the DOE states "Those utilities that have implemented AMR systems over the last several decades, have already gained operational savings from fewer manual meter reads and truck rolls for service calls. As a result, implementation of AMR affects the amount of operational savings that can be achieved from the transition to investments in AMI."

a. Duquesne Light's Current Systems and Infrastructure

10. Duquesne Light implemented an advanced meter reading ("AMR") system in 1997. Presently, eighty-five (85) percent of Duquesne Light customers are served from the existing AMR system.

11. Moreover, the Company's smart meter plan includes the replacement of the AMR system with AMI. AMI includes a Head-End Data Collection System, Local Area Network, Wide Area Network, and ITRON smart meters. ITRON smart meters have the ability to communicate outages and restorations at the meter.

12. Distribution automation is an advanced capability that can be enhanced with AMI implementations. In the simplest terms, distribution automation is the real-time monitoring and control of devices on the distribution system to control voltage, reroute power, and restore service. In the past, distribution automation has been used by utilities to varying degrees, largely to monitor and control devices at the major device level. Distribution automation can be

enhanced by an AMI implementation by providing the ability to monitor and control devices down to the meter level.

13. Duquesne Light's distribution system includes 23kV and 4kV radial distribution circuits, 23kv sub-transmission lines, and a secondary network system serving Downtown Pittsburgh. Approximately 60 percent of Duquesne Light customers are served from the 23kV radial distribution circuits. The Company's 23kV protection devices consist of substation breakers, 3 phase sectionalizers, 3 phase reclosers, line fuses, secondary network limiters, and completely self protected ("CSP") transformers. The 23kV voltage control devices include substation load tap changing (LTC) transformers, regulators and capacitor banks. All 23kV substation breakers, 23kv sectionalizers and reclosers, and all network protectors are Supervisory Control And Data Acquisition ("SCADA") controllable.[5] In addition, all 23kV LTC transformers, regulators and capacitor banks are also SCADA controlled. Duquesne Light's 23kV distribution system is completely automated and provides instantaneous outage notification, voltage detection and loading information as well as the ability to restores service, raise or lower voltage on feeders, and reroute power to alleviate overloads.[6]

14. Duquesne Light has an Outage Analysis System ("OAS") that is used to track emergency trouble calls, provides a means to manually group these calls to protective devices, and enables real time updating of the interactive voice response ("IVR") with useful outage information for customers to hear. In addition to OAS, Storm Tracker, which is a DLC software application, is used to manage outages during severe weather conditions.

[5] The protective devices on 4kV lines consist of substation breakers, single phase oil reclosers, line fuses, transformer fuses and CSP transformers. These devices are not SCADA controlled.

[6] The outage and voltage detection information is provided at the major device level, as opposed to the meter level.

15. Through its SCADA system, the Company employs distribution automation which is leveraged for service restoration via remote switching, voltage control of distribution circuits, and rerouting power to alleviate overloads. The benefit of such automation is reflected in the Company's reliability metrics. Likewise, the Company's AMR implementation has resulted in significant operational savings from the elimination of manual meter reads, and reduced truck rolls more than a decade ago.

16. Nonetheless, the Company believes that the incremental benefits that can be achieved warrant the additional investment required to implement advanced outage communications, restoration and voltage monitoring capabilities. As demonstrated by recent storms, customer's expectations related to reliability are increasing. Customers value the opportunity for improved reliability afforded by smart grid and smart meter deployment. Third party support for this statement can be found in a study conducted by the Smart Grid Consumer Collaborative ("SGCC") entitled *Spotlight on Low Income Consumers Final Report*. SGCC's research indicates that reliability is considered the greatest value added to low income customers. *Spotlight on Low Income Consumers Final Report* p. 6. Accordingly, as the smart grid technology advances and *proven* technologies are introduced in the market, Duquesne Light must continue to invest in state of art technologies in order to maintain the high quality, safe and reliable service that its customers have come to expect.

17. To implement advanced outage communication and voltage monitoring capability, at a minimum the Company will have to replace its current OAS with an Outage Management System (OMS) and develop an electrical model. An electric model is necessary as it connects the customer to the grid and models the electrical connectivity from the substation breaker all the way to the meter. An OMS uses the electrical model to automatically determine what protective device has operated during a power outage and then automatically groups all

customers beyond this device together. The outage notification feature of smart meters can be incorporated into an OMS to help identify what protective device has opened and then verify that all customers have been restored once repairs are completed.

b. Potential Outage Communication, Restoration and Voltage Monitoring Capabilities

18. Given the nature of the Company's existing infrastructure and systems, Duquesne Light is primarily evaluating three advanced capabilities that, if implemented, will provide enhanced outage communication and restoration, and voltage monitoring capabilities. These capabilities include 1) Volt/VAR optimization, 2) Outage Notification, and 3) Transformer Loading. The three capabilities discussed are not inclusive but rather examples of capabilities with the potential to provide substantial benefits. For example, the Company will also evaluate opportunities to use features such as tamper alerts to energy diversion and predictive analytics to assist in transformer load planning.

19. VAR optimization can produce an efficiency improvement from power factor correction and is considered an enabler for voltage optimization. Voltage optimization is an electrical energy saving technique that can create capacity demand reductions at peak conditions and can also improve power quality. In a distribution system, power flow to the feeder includes "real power flow" and "reactive power flow." Duquesne Light can potentially reduce line losses and improve the voltage profile along the feeder by reducing the amount of reactive power ("VARs") flowing on the distribution feeder.

20. OMS and AMI data can be leveraged to improve outage notification capabilities and improve circuit reliability in many cases. Subcategories of benefits are faster fault identification, reduced search time, and locating nested outages faster by receiving quick

feedback from meters as to whether all the outages on a circuit have been fixed while crews are still on-site.

21. Overloaded distribution transformers are often the result of customers installing air conditioners or other electrical load and can result in power outages to customers during peak load times. Implementing technology that improves the ability to identify transformers approaching their limit before they overload can prevent an outage and potentially extend the life of the equipment.

22. As previously indicated, each of these capabilities require, at minimum, an OMS and the electrical model. Replacing the existing OAS and implementing an electrical model is a foundational requirement to delivering any of the enhanced capabilities explained in this filing. Implementation of these advanced capabilities requires substantial planning and is a multi-year, multimillion dollar undertaking.

c. **Cost-Benefit Analysis and Implementation Roadmap**

23. To aid in the development, evaluation and planning process for the OMS and Electrical Model, Duquesne Light issued a Request for Information ("RFI") to solicit conceptual proposals from industry experts regarding advanced outage communication and voltage monitoring technology and cost-benefit information. The Company received responses from two experienced industry experts. The confidential responses provided by the industry experts are enclosed and marked Appendix A.

24. The companies provided Duquesne Light with high level cost and benefit data for the advanced capabilities discussed herein. Based on the information provided by these industry experts, Duquesne Light currently estimates that the costs for implementing an OMS system, electrical model and additional technology that will deliver the advanced capabilities discussed

herein would range from $22,000,000 to $44,000,000.[7] The broadness of this range is indicative of the preliminary nature of the estimate and difficulty in providing certain cost in the absence of a full study.

25. Benefits from advanced outage communication and voltage monitoring may include, but are not limited to, improved customer communication during outages including the ability to proactively communicate with customers regarding service disruptions, reduced line loss opportunities, operational efficiencies such as improved crew management and asset management, as well as providing opportunities to improve power quality, operate equipment more efficiently, and implement conservation and demand response programs.

26. Without a detailed study it is difficult to monetize the benefits expected from implementing advanced outage communication, restoration and voltage monitoring capabilities. Costs and benefits are driven by a combination of logic, variables and data, many of which are unknown at this time. However, preliminary estimates indicate that the Company may potentially achieve benefits ranging from $120,000,000 to $250,000,000 over a 20 year period. These estimates are provisional, and subject to change based on the outcome of a detailed study of the Company's distribution systems and infrastructure and potential changes in future costs. It is also important to note that the models used by industry experts to generate order of magnitude benefits are based on an integrated utility model.

[7] This is an order of magnitude estimate with a 70% confidence level. Additional work is required to refine the costs and benefits data and develop the roadmap for implementation.

27. Nonetheless, the intangible benefits of implementing advanced outage communication, restoration and voltage monitoring capabilities are significant. As demonstrated by recent events such as super storm Sandy, customers expect more communication and faster restoration. Within reason, the Company must invest in state of art technologies to continue providing safe and reliable service that its customers expect.

28. Presently, Duquesne Light envisions implementing Volt/VAR optimization, outage notification and transformer loading capabilities in three (3) phases. Phase I is the Strategic Development Phase. Phase I of the project will include a more detailed study of distribution operations processes and technology, data collection as well as an implementation roadmap. The Company expects that Phase II will focus on implementation of advanced outage capabilities and Phase III will focus on distribution applications. However, until the Strategic Development Phase is complete, the costs, benefits and exact scope of work to be completed in Phases II and III are tentative and subject to change. Enclosed and marked Appendix B is a timeline that illustrates the current implementation strategy pending further review during Phase I and Commission approval.

29. Based on the results of Phase I, the Company will provide the Commission and interested parties with its implementation roadmap including specific capabilities supporting technology recommendations and refined cost-benefit information. Subject to Commission approval, Phase I will commence in the fourth quarter of 2014. Also, in the fourth quarter of 2014, the Company will begin collecting data required for the creation of an electrical model in the future. As previously discussed, the Company cannot implement advanced outage or voltage capabilities without building an electrical model.

30. Following competition of the Phase I study, the Company will petition the Commission for approval to implement specific advanced outage communication, restoration and voltage monitoring capabilities consistent with the information gathered during Phase I - Strategic Development.[8]

V. CONCLUSION

WHEREFORE, Duquesne Light Company requests that the Pennsylvania Public Utility Commission:

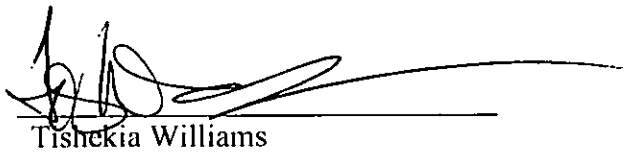
1) Approve this filing and attached appendices as compliant with the Commission *May 6 Order*; and

2. Authorize Duquesne Light to begin Phase I - Strategic Development of its Outage Communication, Restoration and Voltage Monitoring Plan and data collection; and

3) Authorize Duquesne Light to recover its interim and actual costs for the Phase I study and data collection through the smart meter charge, estimated at $1-$1.5 million. The Company will petition the Commission for approval to implement specific advanced outage and voltage capabilities and cost recovery following the completion of Phase I.

[8] For customers to benefit from the advanced capabilities discussed in this filing, implementation must be coordinated with the Company's broader AMI deployment. The Company intends to complete the installation of the electrical model by the time there is a critical mass of smart meters deployed. Moreover, the Company anticipates that its current AMI meter deployment may be altered, although not delayed, by the extensive work required to layer in the outage and voltage capabilities discussed herein. It is too early to determine the precise impact to the AMI plan. If it is determined that modifications to the AMI deployment plan are required, the Company will include that information in its post-Phase I filing.

Respectfully submitted,



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Attorneys for Duquesne Light Company

Date: August 2, 2013

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Duquesne Light Company Smart Meter Procurement and Installation Plan	:	Docket No. M-2009-2123948

VERIFICATION

I, Joan M. Flinko, being an agent of Duquesne Light Company, state that I am authorized to make this Verification on behalf of Duquesne Light Company that the facts and information set forth in the foregoing Final Smart Meter Procurement and Installation Plan Compliance Filing are true and correct to the best of my knowledge, information and belief, and I expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: August 2, 2013

Joan M. Flinko
Manager, AMI Program

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APPENDIX A

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Conceptual SM Timeline with outage & voltage

Duquesne Light
Our Energy...Your Power

	2014	2015	2016	2017	2018	2019	2020
	•Bi-directional communication •Remote Meter Programming •Hourly Usage Data	•Hourly Consumption •TOU/TPR •Net Metering	•Remote Connect/Disconnect •15 Minute Interval Data	•Voltage Monitoring** •Outage Notification**			
•Cumulative meter installs	*5k*	*90k*	*198k*	*306k*	*414k*	*532k*	*600k*

Estimate DLC Outage/Voltage Timeline*

Create and Maintain Electric Model 6/2014 – 6-2018

Phase 1 6/2014 – 6/2015

Phase 1 – Strategic Development
- Study of distribution operations processes & technologies
- Implementation planning
- Refined cost/benefit detail
- Recovery planning

Phase 2 6/2015 – 6/2018

Phase 2 – Advance Outage Capabilities
- Implement an OMS
- *Advanced Outage Communications*
- Advanced Restoration Processes

Phase 3 1/2018 – 12/2020

Phase 3 – Advanced Distribution Capabilities
1/2018 – 12/2020
- Implement DMS
- VOLT/VAR
- Transformer Loading
- Improved power quality

**Timeline is an estimate and subject to Phase 1 study results. Phase capabilities are a representative sample and are not limited to the items listed. The bullets are also subject to change.*
***As currently approved in the filing.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant):

VIA FIRST-CLASS MAIL

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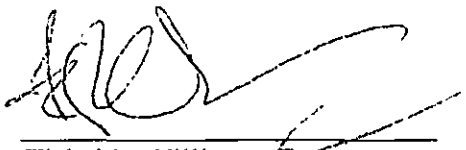

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Dated August 2, 2013

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2. **Fold the printed sheet containing the label at the line so that the entire shipping label is visible. Place the label on a single side of the package and cover it completely with clear plastic shipping tape. Do not cover any seams or closures on the package with the label.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

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   Hand the package to any UPS driver in your area.
   Take your package to any location of The UPS Store®, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

   Customers with a Daily Pickup
   Your driver will pickup your shipment(s) as usual.

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