

CITIZEN POWER

Public Policy Research Education and Advocacy

October 12, 2015

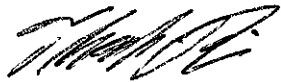
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, PA 17201

Re: Petition of Duquesne Light Company for Approval to Modify its Smart meter Procurement and Installation Plan; Docket No. P-2015-2497267

Dear Secretary Chiavetta:

Enclosed for filing with the Commission please find the Prehearing Memorandum of Citizen Power, Inc. in the above-referenced proceeding.

Sincerely,



Theodore Robinson
Counsel for Citizen Power

Enclosure

cc: Honorable Katrina L. Dunderdale, ALJ
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for :
Approval to Modify its Smart Meter : Docket No. P-2015-2497267
Procurement and Installation Plan :

PREHEARING MEMORANDUM OF CITIZEN POWER, INC.

Pursuant to the Public Utility Code, 52 Pa. Code § 5.222(d)(1), and in response to the October 2, 2015 Prehearing Conference Order issued by Administrative Law Judge (“ALJ”) Katrina L. Dunderdale in the above-captioned matter, Citizen Power, Inc. (“Citizen Power”) submits this Prehearing Conference Memorandum.

I. History of the Proceeding

On August 4, 2015, Duquesne Light Company (“Duquesne” or “Company”) filed the *Petition of Duquesne Light Company for Approval to Modify its Smart Meter Procurement and Installation Plan* (“Petition”). Included with this Petition was a copy of Duquesne’s Amended Smart Meter Plan along with the direct testimonies of Brian Novicki, James Karcher, and William Pfrommer.

On August 24, 2015, Citizen Power and the Office of Consumer Advocate (“OCA”) both filed Answers to the Petition requesting that the Petition be referred to the Office of Administrative Law Judge (“OALJ”) for evidentiary hearings. Also on August 24, 2015, Duquesne filed the written supplemental direct testimony of James T. Karcher.

On September 3, 2015, the Office of Small Business Advocate (“OSBA”) filed a Notice of Intervention, Public Statement, Verification, and Notice of Appearance.

On September 18, 2015, the OCA filed a Notice of Intervention and Public Statement.

On October 2, 2015, the Pennsylvania Public Utility Commission issued a Notice of Prehearing Conference schedule for October 13, 2015. Also on October 2, 2015, ALJ Katrina L. Dunderdale issued a Prehearing Conference Order setting forth the rules for the prehearing conference and the proceeding.

II. Service List

Citizen Power respectfully requests that its entry on the service list should be for its counsel, as follows:

Theodore Robinson
Staff Attorney
Citizen Power
2121 Murray Avenue
Pittsburgh, PA 15217

Counsel consents to the service of documents by electronic mail to robinson@citizenpower.com, as provided in 52 Pa. Code § 1.54(b)(3).

III. Schedule and Discovery Rules

Citizen Power will work with the other parties to develop a litigation schedule that will be acceptable to the Presiding Officer.

IV. Witnesses

At this time, Citizen Power has not determined whether they will offer testimony in this matter. If it is determined that Citizen Power will be calling a witness, the Administrative Law Judge and other parties will be notified as soon as the witness is identified.

V. Issues

Citizen Power is in the process of reviewing the filing and testimony submitted by the Company. Citizen Power has concerns about whether the proposed overall ADMS implementation is cost-effective and reasonable, whether the proposed increased costs of the AMI project are reasonable, whether a \$15 million dollar contingency component is necessary, and whether the ADMS costs should be collected using the same methodology as used to collect the AMI cost recovery.

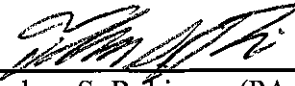
At this time, Citizen Power continues to evaluate its position on the filing and will refine its position based upon further study of the plan, review of discovery and additional input from other parties. Petitioner reserves the right to raise other issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties.

VI. Settlement

Citizen Power recognizes the potential savings for the Court and the Parties that can be achieved through settlement. Citizen Power is amenable to settlement discussions and the possibility of reaching a settlement in this matter.

Respectfully Submitted,

Citizen Power, Inc.

By: 
Theodore S. Robinson (PA Bar # 203852)
Citizen Power
2121 Murray Avenue
Pittsburgh, PA 15217
(412) 421-7029 (phone)

Dated: October 12, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for :
Approval to Modify its Smart Meter : Docket No. P-2015-2497267
Procurement and Installation Plan :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Prehearing Memorandum of Citizen Power, Inc. upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

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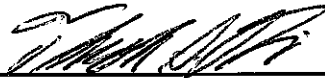
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Dated this 12th day of October, 2015

By:



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