

December 24, 2015

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Ryan Driscoll v. Duquesne Light Company
Docket No. C-2015-2514759

Dear Secretary Chiavetta:

Enclosed please find Ryan Driscoll's Reply Brief to Duquesne Light's Preliminary Objections.
A copy of this document has been mailed to Respondent.

Sincerely,



Ryan P. Driscoll
Plaintiff

RECEIVED

DEC 24 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

167016

Reply

1. As my own independent research of the democratically passed law, 2008 Pa. ALS 129, 2008 Pa. Laws 129, and a reading of previous Pennsylvania Public Utility Commission (hereafter, “the Commission) rulings confirm, there appears to be no opt-out provision in Section 2807 of the Public Utility Code.

2. However, Section 2807 allows for a 15-year depreciation schedule by which a utility company shall install smart meters for all of its customers. See 66 Pa. C.S. § 2807 (f)(2)(iii). The 15-year clock started November 15, 2008, 30 days after Governor Rendell signed the Act into law.

3. Therefore, I respectfully request that the Commission not dismiss my complaint. Instead, I request that the Commission rule that my residence, 5507 Richland Road, Gibsonia, PA 15044, be allowed to delay implementation of the new smart meter until no later than December 31, 2022, and no earlier than November 1, 2022. The delay in implementation will allow both my family and the utility company, Duquesnes Light Company, the opportunity to fully comply with the law as currently written. Additionally, it will allow me an opportunity to determine how to adequately prepare our home for the eventual installation of the smart meter, find a new residence that is allowed to opt-out of the smart meter technology, and/or allow the technology more time to fully evolve.

PRAYER FOR RELIEF

WHEREFORE, I, Plaintiff, Ryan P. Driscoll, respectfully requests that the Pennsylvania Public Utility Commission grant the following relief:

A. Delay of time when the new smart meter must be installed until no later than December 31, 2022, and no earlier than November 1, 2022

Respectfully submitted,

RYAN DRISCOLL

By: /s/ Ryan P. Driscoll
5507 Richland Road
Gibsonia, PA 15044
(412) 956-5787





9505 5111 2034 5358 3661 92

POSTAL
1004

17105

\$0.10
00112034-04

FROM: Ryan Driscoll
5507 Richland Rd.
Gibsonia PA 15044

 DATE OF DELIVERY SPECIFIED*

 USPS TRACKING™ INCLUDED*

 INSURANCE INCLUDED*

 PICKUP AVAILABLE

* Domestic only

TO: Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg PA 17105-3265

WHEN USED INTERNATIONALLY,
A CUSTOMS DECLARATION
LABEL MAY BE REQUIRED.



PS00001000014

EP14F July 2013
OD: 12.5 x 9.5

VISIT US AT USPS.COM®
ORDER FREE SUPPLIES ONLINE



This packaging is the property of the U.S. Postal Service® and is provided solely for use in sending Priority Mail® shipments. Misuse may result in this packaging being returned to the U.S. Postal Service. This packaging is not for sale.