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November 8, 2016

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

**RE: Mary Paul v. PECO Energy Company
Docket No. C-2015-2475355**

Dear Ms. Chiavetta:

Enclosed for filing is PECO Energy Company's Answer to Complainant's Motion to Compel.

Very truly yours,



Ward L. Smith
Counsel for PECO Energy Company

WS/ab
Enclosure

cc: Christopher P. Pell, ALJ
Darlene D. Heep, ALJ
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Mary Paul :
 :
v. : **C-2015-2475355**
 :
PECO Energy Company :

**PECO Energy Company's Answer
to
Ms. Paul's Motion to Compel**

On Monday, October 24, 2016 (4:20 p.m.), PECO received Ms. Paul's Interrogatories and Requests for Production of Documents, Set II, Qs. 1-7.¹ On October 28, 2016, PECO served Ms. Paul with its Objections to Set II, Qs 1, 2, 5, and 6. (The transmittal letter and certificate of service evidencing that service were filed with the Commission and served on Your Honors on that same date.) On Friday, November 4, 2016, PECO received Ms. Paul's Motion to Compel answers to three of the objected-to questions: Set II, Qs. 1, 5, and 6. PECO hereby Answers the Motion to Compel.

Set II, Question 1:

Ms. Paul posed the following question as Set II, Question 1:

Paul Interrogatory 2-1:

Please produce the records that show the dates of the installation and removal of the devices installed on my house to control my air conditioning compressors for the A/C Saver Program and the record of my request for their removal and the reason I gave for their removal.

¹ PECO previously received and responded to Set 1, Qs 1-33, without objection.

PECO posed the following objection:

PECO Objection:

Objection on grounds of relevance. This proceeding involves the installation of a PECO AMI meter. The Complaint does not raise any issues related to devices to control air conditioning compressors. The question therefore does not seek relevant evidence, nor is it reasonably likely to lead to the discovery of relevant evidence.

Upon further review of the Complaint in this matter, PECO has concluded that Ms. Paul did mention air conditioning control devices in the original complaint. PECO therefore withdraws its objection to this question and will provide the requested records to Ms. Paul.

Set II, Question 6:

Ms. Paul posed the following question as Set II, Question 6:

Paul Interrogatory 2-6:

In the pictures attached, please describe the function of PECO's AMI meter that extends 3 to 4 inches further than the AMI meter next to it. These meters are installed on a residence at 8974 Gap Newport Pike, Landenberg, PA 19350.

The pictures referred to are appended to this Answer.

PECO posed the following objection:

PECO Objection:

Objection on grounds of relevance. Complainant's address is 239 Honey Locust Drive, Avondale, PA, not 8974 Gap Newport Pike, Landenberg, PA. The Complaint does not raise – nor could it raise -- any issues related to service conditions at 8974 Gap Newport Pike. The question therefore does not seek relevant evidence, nor is it reasonably likely to lead to the discovery of relevant evidence.

Ms. Paul's Motion to Compel an answer to this question appears to be based upon her view that the pictures "do show a different kind of meter," and she therefore wishes to challenge PECO's statements that it is primarily using Focus AXR-SD devices.

PECO has no objection to providing a general answer to a hypothetical question regarding the identified meter configuration – this meter configuration is generally used to provide service to homes that are wired for peak/off peak metering, which during the time it was offered required two meters, which were then replaced with two AMI meters, both of which use Focus AXR-SD communication devices. PECO's objection is that, through this question, Ms. Paul is attempting to bring questions into this proceeding about PECO's service to a second residence, which is about one mile from Ms. Paul's residence – and service to that second residence is beyond the scope of this proceeding. Moreover, PECO is constrained from providing to Ms. Paul customer-specific information about PECO's service to another customer. It therefore objected to and continues to object to this interrogatory.

Set II, Question 5:

As far as PECO can tell, Ms. Paul's Motion to Compel did not restate either her Question 5 or PECO's Objection to it.

Ms. Paul posed the following question as Set II, Question 5:

Paul Interrogatory 2-5:

Do any of PECO's AMI meters in my subdivision send data or information transmissions to any other PECO AMI meter in my subdivision?

PECO posed the following objection:

PECO Objection:

Objection on grounds of relevance. PECO already answered this question with respect to the Paul residence in its Answer to Interrogatory I-4: PECO does not expect the Paul meter to be buddy-enabled, and it therefore will not be in communication with other meters. This follow-up question therefore cannot obtain evidence that is relevant to service to the Paul residence, nor is it reasonably likely to lead to the discovery of evidence that is relevant to service to the Paul residence.

For full reference, Ms. Paul's Interrogatory 1-4, and PECO's Answer thereto, were:

Paul Interrogatory 1-4:

Are any of the AMI meters in my development part of a single hop mesh or a mesh network and, if so, how many meters are in this network and where are the locations of the collector/router meters within a 10-mile radius of my home?

PECO Answer to Paul Interrogatory I- 4:

PECO's AMI system does not utilize a mesh network. There are no collector/router meters on the PECO system.

If a PECO AMI meter is not capable of communicating directly with a Tower Gateway Basestation, it can be set to "buddy" mode, which sometimes may be referred to as "single hop" mode. In buddy mode, the meter communicates with another meter that is buddy-enabled. The buddy-enabled meter then transmits to the Tower Gateway Basestation. There is no separate meter type that is used for such transactions; the meters are buddy-enabled or -disabled by software. PECO does not expect the Paul meter to be buddy-enabled.

PECO respectfully submits that, in its Answer to Interrogatory I-4, it provided Ms. Paul with full information about both the overall operating characteristics of its AMI system, and of the specific operating characteristics of the meter to be installed at her home – including the fact that the meter in her home will not be “buddy-enabled,” and therefore will not be in communication with other meters. Read in that context, her follow-up Question II-5, which seeks information

regarding service to other customers, cannot lead to the discovery of evidence relevant to Ms. Paul's complaints regarding service *to her residence*.

Set I, Question 10:

Ms. Paul also makes a passing reference to PECO's Answer to Interrogatory I-10, and claims that PECO "has not provided a complete answer" to that Interrogatory. While Ms. Paul did not make a Motion to Compel with respect to Interrogatory I-10, PECO nonetheless disagrees with the characterization of its answer as "not complete." Copies of Interrogatory I-10, and PECO's Answer to it, are attached for Your Honors convenience.

Conclusion

For the reasons stated above, PECO will provide an answer to Ms. Paul's Interrogatory Set II, Q.1, but requests that Your Honors sustain its objections to Set II, Qs. 5 and 6.

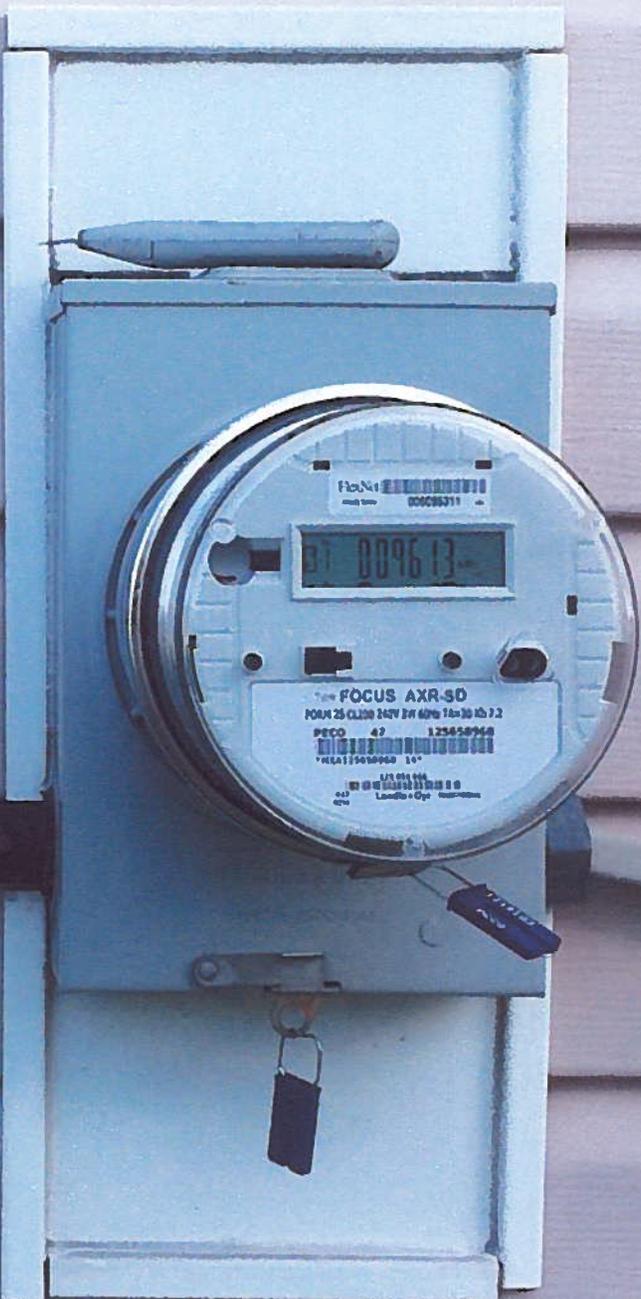
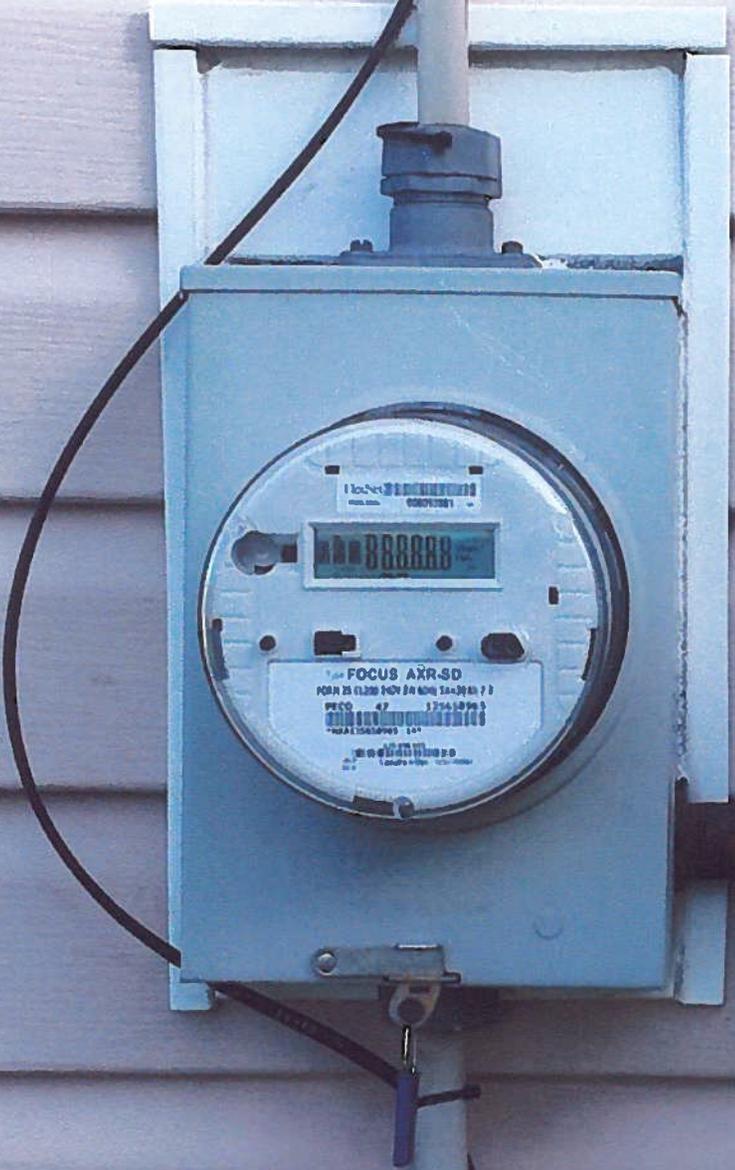
Respectfully submitted,



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November 8, 2016





**PECO's Answers to
Complainants' Interrogatories, Set I
Mary Paul v PECO, Docket No. C-2015-2475355**

Paul Interrogatory I-10:

How many transmissions of radiofrequency/microwave radiation per day does each AMI meter make for any purpose, from the Zigbee component and separately, from the Flexnet component?

PECO Answer to Paul Interrogatory I-10:

The FlexNet communication module is programmed by the manufacturer to transmit once every ninety minutes. The Zigbee is programmed to transmit once every thirty seconds until it pairs with an enabled device.

Once installed, the frequency of transmission from the FlexNet communication module will be remotely tuned to reflect how well the specific module communicates with the nearest Tower Gateway Basestation. Theoretically, the module can be tuned to transmit as frequently as once every 15 minutes or as seldom as once every 240 minutes. The system average tuning to date is approximately once every 145 minutes, or just under 10 (9.63) times a day on average. However, PECO has reviewed the communication tuning of the installed FlexNet modules in the immediate neighborhood of the Paul residence, and materially all have been tuned to 150 minutes (9.6 times a day) or less. PECO therefore expects that the Paul AMI will be tuned to transmit once each 150 minutes (9.6 times a day) or less.

The ZigBee radio is currently programmed to transmit once every thirty seconds until it is paired to any known device(s) in the household. Under the existing programming, once the Zigbee radio is paired to any known device(s) in the household, the duty cycle will decrease.

Responsible Witness: Glenn Pritchard

