

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CHRISTOPHER L. MACEY

:

:

v.

:

Docket No. C-2017-2628021

:

WEST PENN POWER COMPANY

:

REPLY TO ANSWER AND NEW MATTER

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

AND NOW, Christopher L. Macey, pro se, replies to the Answer and New Matter as follows:

I. Background

1. Admitted.

2. Admitted.

3. Admitted.

4. Denied. As stated in the Formal Complaint, Complainant "requests the judge compel West Penn Power/First Energy to delay installation of the Smart Meter to 4th Quarter 2022 for my residence at 201 Highland Avenue S, Oakdale, PA 15071" (paragraph 5). Respondent asserts that the company cannot delay the installation of the smart meter, yet gives no evidence to support that statement. In fact, the Company's SMP states that "**Companies expect to install approximately 98.5% of all meters by December 31, 2019 with the remaining 1.5% of the meters being installed thereafter through December 31, 2022.**"¹ Respondent is clearly planning to continue installing smart meters through the 4th Quarter of 2022 and offers no reason that Complainant's request for relief cannot be ordered by the Commission and accommodated. (See exhibit 1.)

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¹Joint Petition of West Penn Power Company et al, The Full Scale Deployment, page 42.

5. Denied. A response to Complainant's request for relief is required. Answer seeks to deny Complainant's right to due process regarding the issue of the deferment of installation to the 4th Quarter of 2022. Further, the Commission's website specifically states **"Smart meters must be installed no later than 2023 for customers of the seven EDCs covered under the law."**² (See Exhibit 2.)
6. Denied. Formal Complaint states that there is no PFA order.
7. Admitted.
8. Not applicable.
9. Not applicable.
10. Not applicable.

NEW MATTER

11. Not applicable.
12. Denied. Complainant does not possess a record of the July 19, 2016 communication. Complainant has no record of the July 10, 2017 "detailed response" from the Company.
13. Admitted.
14. Denied. Respondent's assertion is incomplete in that the SMP clearly states in the Full Scale Deployment Stage that installation continues through December 2022.
15. Denied. Complainant was not a subscriber for electric power service from the Company at the time the Company's SMP was filed and passed in 2008.
16. Denied. Respondent's assertion is not supported.
17. Denied.

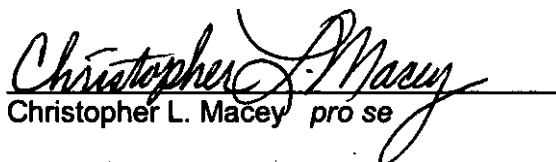
²PA PUC website, Smart Meter Q&A.

18. Denied. This assertion is factually incorrect. Complainant is asking to have the installation of the smart meter deferred until the 4th Quarter of 2022, which is consistent with the Company's own SMP and should the Commission rule in favor of the Complainant, there would be no violation of Act 129.
19. Denied. Respondent's Preliminary Objection sets forth NO precedent for dismissal of the Formal Complaint. The relief of the Formal Complaint asks for relief in the deferment of the installation of the smart meter to the 4th Quarter of 2022.

III. Conclusion

WHEREFORE, for the foregoing reasons, Complainant respectfully requests that the Commission order the West Penn Power Company to defer installation the Smart Meter at Complainant's residence of 201 Highland Avenue S, Oakdale, PA 15071 to the 4th Quarter of 2022 (deferment to after October 1, 2022).

Dated this 18th day of November, 2017


Christopher L. Macey pro se

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Exhibit 1

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT PETITION OF METROPOLITAN
EDISON COMPANY, PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA
POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF
THEIR SMART METER DEPLOYMENT
PLAN** :
: **DOCKET NOS. P-2012-**
: **P-2012-**
: **P-2012-**
: **P-2012-**
:
:

**JOINT PETITION OF
METROPOLITAN EDISON COMPANY,
PENNSYLVANIA ELECTRIC COMPANY,
PENNSYLVANIA POWER COMPANY AND
WEST PENN POWER COMPANY**

Kathy J. Kolich (Pa. No. 92203)
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
Phone: (330) 384-4580

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Catherine G. Vasudevan (Pa. No. 210254)
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*Counsel for Metropolitan Edison Company,
Pennsylvania Electric Company,
Pennsylvania Power Company and
West Penn Power Company*

Dated: December 31, 2012

The Solution Validation Stage incorporates two activities: the build out of the infrastructure needed to install smart meters and a testing period in which a “mini version” of the end to end smart meter solution is constructed and tested prior to full scale deployment. This stage is expected to start in late 2013 and continue through early 2017.

- *Build-Out Activities.* This period begins upon Commission approval of this Deployment Plan and will continue for approximately three years. During this period, the Companies will commence construction of the smart meter solution infrastructure, or “backbone” for the “mini system”. This will involve the installation of meters, collectors, network communications, and meter data management systems for testing.
- *Solution Testing Activities.* As the infrastructure is built, the Companies will start to install meters in Penn Power’s service territory. This territory was selected because it includes challenges the SMIP Team anticipates encountering during full deployment. Approximately 5,000 meters will be installed in 2014; 15,000 in 2015; and 40,000 in 2016, so as to allow for testing of scalability and resolution of communication, functionality and installation problems encountered in a contained and controlled environment, thus minimizing costs of deployment and customer frustration. Only after all such problems are resolved will the Companies commence the final stage, Full-Scale Deployment, currently anticipated to commence in early 2017.

The Full-Scale Deployment Stage will commence upon resolution of all problems encountered during the Solution Validation Stage and will continue until all meters are installed on or before December 31, 2022. During this stage, the remainder of the smart meter infrastructure will be concurrently built in each of the Companies’ respective service territories, starting with the most populated areas first. All remaining smart meters will be installed during this Stage at an anticipated average meter installation rate of 3,000 meters per day, five days per week. At this pace, the Companies expect to install approximately 98.5% of all meters by December 31, 2019, with the remaining 1.5% of the meters being installed thereafter through December 31, 2022. The 1.5 % of the installations represent those installations that may require alternative communication solutions or difficult to reach locations such as remote hunting cabins.

Figure 3.2 illustrates the anticipated implementation schedule, while Figure 3.3 illustrates the anticipated meter deployment schedule:

Exhibit 2

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Smart Meter Q&A



Find out more about Smart Meters and Act 129, and shop for your supplier, at www.PAPowerSwitch.com

Switch & Pennsylvania Public Utility Commission

ARE SMART METERS REQUIRED IN PENNSYLVANIA?

Yes. Pennsylvania's Act 129 of 2008 requires the state's seven largest electric distribution companies (EDCs) to develop energy efficiency and conservation (EE&C) plans and adopt other methods of reducing electricity used by customers – including the use of smart meters by their customers. The EDCs impacted by Act 129 are Duquesne Light; Met-Ed; Penn Power; PECO Energy; Penelec; PPL Electric Utilities; and West Penn Power.

The Public Utility Commission (PUC) is charged with implementing Act 129 and helping consumers and electric utilities reduce energy consumption, especially at peak times during the day. Smart meters are being installed in new construction and at individual customers' request, with the goal of all customers utilizing smart meters by 2023.

WHAT IS A SMART METER?

A smart meter is an advanced meter that measures electric usage more often than conventional meters and sends that information more quickly to the customer and the EDC. Through two-way communication, smart meters also can monitor the electric distribution system to ensure it is functioning properly.

Smart meters have the following basic functions: measure the electricity used; with customer consent, remotely coordinate electricity consumption; and interface with EDCs to identify outages and provide real-time visibility into the operational status of an electrical distribution system.

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HOW WILL I BENEFIT FROM THE USE OF A SMART METER?

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- Smart meters can help your utility restore your service faster during power outages.
- Smart meters can help you better understand how much electricity you are using throughout the day.
- Smart meters can reduce meter-reading costs and help detect theft of electricity.

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HOW COULD A SMART METER HELP ME SAVE ON MY ELECTRIC BILL?

Customers on time-of-use rate plans can use the information from smart meters to shift their usage to different times of the day when electricity costs less to produce. By using electricity more efficiently, customers can realize savings on their electric bills. For example, rather than running the dishwasher right after dinner when electric prices are higher, customers can wait until later in the evening to run the dishwasher.

IS THERE CURRENTLY A SMART METER CHARGE ON MY BILL?

Yes. The charge will be included as a separate line item or in your electric utility's base rate. You can confirm that information by contacting your utility. This charge covers the costs of assessing and deploying smart meter technology in accordance with Act 129. Under the law, utilities may begin assessing the surcharge for the work being done prior to actual installation of the meter. This charge applies to all customers.

HOW LONG WILL I PAY FOR THE SMART METER SURCHARGE THAT APPEARS ON MY BILL?

This surcharge is reviewed and approved by the PUC annually, and is subject to change. While there is no definitive timeframe to date, the surcharge is expected to remain on customers' bills as utilities work to achieve full smart meter deployment by 2023.

CAN I OPT OUT OF THE CHARGE IF I DON'T WANT A SMART METER?

No. State law does not allow a customer to "opt out" of their EDC's smart meter program or surcharge. Installation of a smart meter is a condition of service to more accurately reflect rates and usage, and will ensure no disruption to your service. Questions concerning the process or timetable for the installation of your metering equipment should be directed to your electric utility.

WHEN WILL I HAVE MY SMART METER?

Smart meters must be installed no later than 2023 for customers of the seven EDCs covered under the law. Customers who want the technology sooner may ask the EDC to install it. The customer must pay a fee for the early installation. That fee may be as little as \$17. Contact your electric utility for more information.

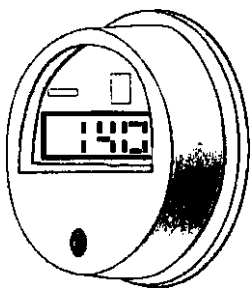
WILL MY SMART METER INFORMATION BE SECURE?

Smart meter communication network is a high-security environment that employs layers of protection from unwanted and unlawful access. Pennsylvania regulations restrict access to customer information, and do not permit an electric company or electric supplier to release private customer information to a third party without customer consent.

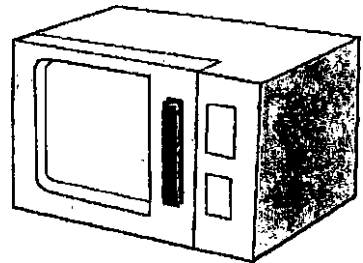
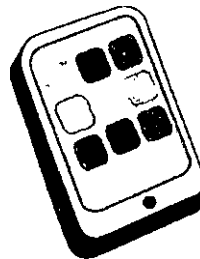
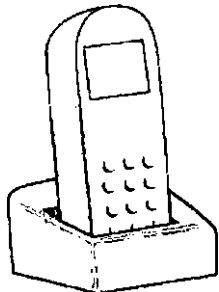
HOW DOES A SMART METER WORK?

Smart meter communications can happen over the power lines or by radio frequency (RF), just like many other devices in your home. According to a study by the California Council of Science and Technology, wireless smart meters, when installed and properly maintained, result in much smaller levels of RF exposure than many existing common household electronic devices.

UNDERSTANDING RADIO FREQUENCIES (RF) AND SMART METERS



<
less than



SMART METER =
0.00037 milliwatt
per square centimeter

CORDLESS PHONE =
0.12 milliwatt
per square centimeter

CELL PHONE =
0.19 milliwatt
per square centimeter

MICROWAVE OVEN =
0.0047 milliwatt
per square centimeter

(Resource FCC's Standard average based on 30 minutes of exposure)

FOR FURTHER INFORMATION, CONTACT YOUR UTILITY OR THE PUC:

Write

PA Public Utility Commission
Bureau of Consumer Services
P.O. Box 3265
Harrisburg, PA 17105-3265

Call

1-800-692-7380
For people with speech or hearing loss,
dial 7-1-1 (Telecommunications Relay
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Visit our websites

www.PAPowerSwitch.com
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CERTIFICATE OF MAILING

I hereby certify that I have this day mailed a correct and true copy of the Reply to Answer and New Matter upon the individuals listed below.

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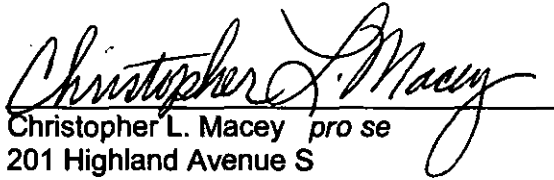
Lauren M. Lepkoski
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2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001

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Dated: November 18, 2017



Christopher L. Macey *pro se*
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Christopher Macey
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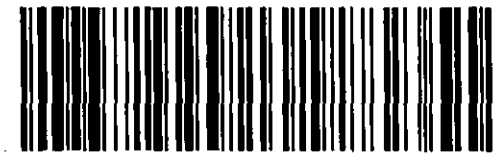
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