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November 3, 2008

VIA HAND DELIVERY

Mr. James J. McNulty
Commission Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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SECRETARY'S BUREAU

Re: Docket No. M-2008-2069887; Comments on behalf of Sensus Metering Systems, Inc. for Energy Efficiency and Conservation Program and EDC Plans

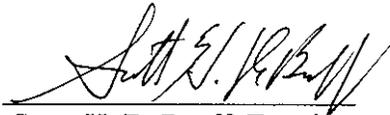
Dear James:

Enclosed please find an Original and eight (8) copies of the “**Comments on behalf of Sensus Metering Systems.**” Please enter this into the docket and time-stamp the additional two (2) copies and return to us. For the remaining three (3) additional copies, please distribute to the following: Commission’s Bureau of Fixed Utility Services (FUS), Bureau of Conservation, Economics, and Energy Planning (CEEP) and the Law Bureau (Law).

If you have any questions regarding this filing, please do not hesitate to call us at (717) 233-5731.

Best regards,

RHOADS & SINON LLP

By: 
Scott H. DeBroff, Esquire

SHD/msi

cc: Commission’s Bureau of Fixed Utility Services (FUS)
Bureau of Conservation, Economics, and Energy Planning (CEEP)
Law Bureau (Law)

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ENERGY EFFICIENCY AND
CONSERVATION PROGRAM AND
EDC PLANS

Docket No. M-2008-2069887

COMMENTS ON BEHALF OF SENSUS METERING SYSTEMS
TO THE ACT 129 OF 2008 IMPLEMENTATION PLAN

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DATED: NOVEMBER 3, 2008

COUNSEL FOR SENSUS METERING SYSTEMS, INC.

**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**ENERGY EFFICIENCY AND
CONSERVATION PROGRAM AND
EDC PLANS**

Docket No. M-2008-2069887

**COMMENTS ON BEHALF OF SENSUS METERING SYSTEMS
TO THE ACT 129 OF 2008 IMPLEMENTATION PLAN**

AND NOW COMES, **Sensus Metering Systems, Inc.** (“Sensus” or “SMS”), by and through its counsel, **Scott H. DeBroff**, Esquire and **Alicia R. Petersen**, Esquire of Rhoads & Sinon LLP. In support of this docket, Sensus avers the following:

1. **Sensus Metering Systems, Inc.** is a party interested in the above-captioned docket as a meter technology provider which has participated in key initiatives to support the implementation of advanced metering throughout the United States and beyond. Sensus wishes to become an active party in this proceeding and offer its thoughts regarding the procedural, technical, interpretive and implementation issues; measurement of electric distribution company (EDC) compliance; and direction to the EDCs in regard to their plans.

2. **Sensus Metering Systems, Inc.** with its headquarters in Raleigh, North Carolina, is a leading world-class provider of high-value metering, Automatic Meter Reading (AMR) and

Advanced Metering Infrastructure (AMI) system solutions for water, gas, electric, and heat utilities as well as sub-metering entities worldwide.

3. Sensus' attorneys, and to whom all correspondence and pleadings in this docket should be directed to are:

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**COMMENTS ON PA ENERGY EFFICIENCY AND CONSERVATION PROGRAM AND EDC
PLANS**

4. On October 15, 2008 Governor Rendell signed HB 2200 into law as Act 129 of 2008. The Act expands the Commission's oversight responsibilities and imposes new requirements on Electric Distribution Companies (EDCs), an overall goal of reducing energy consumption and demand, enhancing default service procurement and expanding alternative energy sources.

5. The Act contains several time frames and deadlines. The first phase requires the Commission to adopt an Energy Efficiency and Conservation (EE&C) program for each utility, to reduce energy demand and consumption within the service territory of each electric distribution company (EDC) in this Commonwealth, by July 1, 2009.

6. On October 21, 2008, the Commission issued a letter notice in these proceedings soliciting comments on each of the individual aspects of the EE&C Program required under Section 2806.1(a)(1)-(11). They requested stakeholder input on the likely procedural, technical, interpretive, and implementation issues; measurement of EDC compliance; and the level of detail required for providing adequate direction to EDCs in regard to their plans.

7. In regards to the Commission's implementation of Act 129, we believe that the provisions of the new Act which address the duties of the Electric Distribution Companies to file and implement smart meter technology procurement and installation plans, should also carry significant weight and should be addressed at the same time. The implementation of smart metering will be instrumental in developing and supporting Section 2806.1(a) (2). This section states that the EE&C program will include an "evaluation process, including a process to monitor

and verify data collection, quality assurance and results of each plan and the program.” We believe, that in order to achieve the desired results of this Act, and incorporate a better way of measuring and monitoring data collected from each plan, it is important to use a highly capable advanced meter. A smart meter has the ability to provide more timely and accurate data. This technology has the capability of reading hourly and sub-hourly metering data and will be a superior tool with the best capabilities to record data and measure the actual results of each plan and program. In order to determine the ultimate success or lack thereof to many energy efficiency and conservation programs, the Commission must take into consideration the important measurement and verification and evaluation of such a program, and the integration of smart meter technology as program plans are being designed and implemented, is critical.

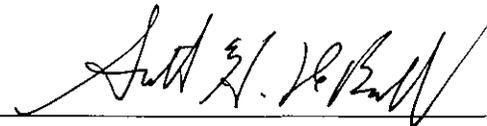
8. In regards to the Commission’s implementation of Act 129, we believe that smart meter technology will be instrumental in developing section 2806.1(a) (6). The Commission’s program must also include “procedures to make recommendations [for] additional measures that will enable an electric distribution company to improve its plan and exceed the required reductions in consumption.” Smart meter technology will be a crucial element to the ultimate success of a plan that will be adopted by an electric distribution company. Implementation of advanced metering systems provides added benefits such as enhanced reliability, improved customer service, and reduced operating costs. Smart meter technology is an integral component to maximize the solution of demand response, load control, and other consumption reduction programs.

9. In regards to the Commission’s implementation, we believe that smart meter technology will be instrumental in developing Section 2806.1(a) (9). This section requires “procedures to ensure compliance with requirements for reduction in consumption” under this Act. Smart

meters have sophisticated technology that can accurately measure the usage and consumption of electricity. Several functions of this device such as two-way communication between the meter and data collector and the overall focus on providing more data will help to promote energy conservation, active participation by the customer, reduce costs and expand the limited resources of the electric distribution company. Smart Meter technology is extremely relevant to achieving success and meeting the goals outlined in this Act. By including smart meters into its plan, the electric distribution company will be able to comply with the ambitious requirements for reduction in consumption under its provisions.

WHEREFORE, Sensus Metering Systems respectfully requests that the Pennsylvania Public Utility Commission grant it party status in the above captioned investigation. Sensus also asks that the Commission enter its comments in the above-captioned proceeding. We look forward to participating in the process going forward and contributing our experience and expertise. Thank you again for the opportunity to comment on this important matter.

Respectfully submitted,

By: 

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COUNSEL FOR SENSUS METERING SYSTEMS, INC.

DATED: NOVEMBER 3, 2008

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ENERGY EFFICIENCY AND
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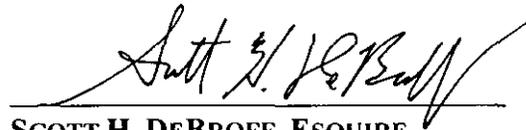
Docket No. M-2008-2069887

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing "COMMENTS ON BEHALF OF SENSUS METERING SYSTEMS" electronically to Mr. James J. McNulty, Commission Secretary, as well as the following: Commission's Bureau of Fixed Utility Services (FUS), Bureau of Conservation, Economics and Energy Planning (CEEP) and the Law Bureau (Law).

Dated: November 3, 2008

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