BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of Smart Meter Procurement and Installation Plans	:	
	:	**Docket No. M-2009-2092655**
	:	

COMMENTS OF METROPOLITAN EDISON COMPANY, PENNSYLVANIA ELECTRIC COMPANY AND PENNSYLVANIA POWER COMPANY

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Dated: April 20, 2009

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I. INTRODUCTION

On October 15, 2008, Governor Rendell signed House Bill 2200 into law as Act 129 of 2008 ("Act 129"). Act 129 became effective on November 14, 2008. Among other things, Act 129 directed all electric distribution companies ("EDCs") with more than 100,000 customers to file with the Pennsylvania Public Utility Commission ("Commission") by August 14, 2009, smart meter technology procurement and installation plans ("Plans"). 66 Pa. C.S. §2807(f). On March 30, 2009, the Commission issued a Secretarial Letter in which it requested comments and reply comments on two documents -- (1) general questions related to smart metering technology (Attachment A); and (2) a proposed Implementation Order for the Plans (Attachment B) – which were to be submitted no later than April 15 2009 and April 27, 2009, respectively.[1]

The FirstEnergy Companies of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company (collectively, "FE Companies") have been an active participant in the implementation of Act 129 and will continue to work with the Commission and other interested parties to develop the rules and processes associated with this endeavor. As part of this process, the FE Companies submit the following comments with Section II focusing on the smart meter technical questions set forth on Attachment A; and Part III, focusing on the proposed standards and guidelines outlined in Attachment B. These comments are in addition to those submitted by the Energy Association of Pennsylvania, in which the FE Companies join.

II. COMMENTS – ATTACHMENT A

Based on the nature of the questions set forth on Attachment A, it appears that the Commission is seeking definitive answers to numerous technical issues surrounding smart meter

[1] Pursuant to a second Secretarial Letter issued on April 9, 2009, these deadlines were extended to April 20, 2009 and April 29, 2009, respectively.

technology. While the FE Companies applaud the Commission's initiative, they caution that smart meter technology is in a relatively infant state. Many of the questions posed cannot be answered with certainty until basic technology assessments and infrastructure designs are completed. Moreover, because of the state of the technology, the FE Companies suggest that the Commission provide general guidelines, rather than mandates, thus providing flexibility that is desperately needed at this stage of the process. It may behoove the Commission to hold at least one technical conference in which all interested stakeholders can provide input, thus more thoroughly vetting these important questions raised.

While the FE Companies have attempted to respond to the Commission's questions, these responses should be read in context based on the observations set forth above. The companies' responses are based on information known to date. As the FE Companies complete their assessments and designs, certain positions set forth in these responses may change.

1. Overall Adaptability:

a. Should there be some common "plug and play" format and/or hardware on the meter to accommodate future technology changes? If so, provide suggested standards for this capability.

FE Companies' Response: The FE Companies believe that uniform "plug and play" standards should be developed, provided that the standards follow nationally recognized standards such as ANSI or IEEE, rather than customized standards specific to Pennsylvania. The goal should be to minimize on-going costs of maintaining the system once it is operational and to avoid premature obsolescence. In an effort to accomplish this, the FE Companies encourage the development of such standards and guidelines for potential vendors, especially in the area of remote firmware up grade capabilities that support communications, meter registers and home area network ("HAN") sections of smart meters.

2. **Home Area Network (HAN) Protocols:**

a. **What HAN protocol may be appropriate from the meter to the customer?**

FE Companies' Response: The FE Companies believe that the HAN technology is a "beyond-the-meter" service that should be viewed as a competitive offering. As a competitive service, the evolution of such technology should be left to the market, rather than be the subject of regulation. Notwithstanding, the FE Companies support a technology with functionality to communicate with an in-home solution (such as HAN) and retrieve meter data that can be assimilated into a web based solution for access by the customer and any of the customer's properly authorized third party representatives.

What HAN open protocols are most readily available and accessible to customers?

FE Companies' Response: Currently, the Zigbee SEP (Smart Energy Profile) appears to be the leading protocol. It remains to be seen whether this continues to be the case. Regardless of the eventual preferred protocol, the FE Companies encourage that, at a minimum, the protocol ultimately selected be subject to nationally recognized standards and protocols and not be custom designed to meet unique Pennsylvania standards.

Should the Commission standardize a protocol?

FE Companies' Response: See the previous responses.

Should there be more than one protocol?

FE Companies' Response: Yes. The key is to achieve interoperability and provide choice of technology and feature sets for the consumer. Given the relatively infant state of the HAN technology, the FE Companies would support a menu of acceptable protocols, provided that such protocols were consistent with nationally recognized standards. Because HAN technology will be a competitive offering, the market should establish the front runners, rather than having it decided by regulation. Moreover, while one protocol may look to be the frontrunner today, competition may allow another technology to surpass the perceived front runner in the future (e.g., 8 track vs. cassette tapes; or BETA vs. VHS.)

b. **Should smart meter information be available through a HAN or an internet browser?**

FE Companies' Response: The FE Companies believe that the data should be made available through both. The FE Companies intend to provide raw meter data directly through the meter via a HAN type solution on a nearly real time basis. Validated data would be provided on a next day basis through an internet browser.

If through an internet browser, should this come from a website, or directly from the meter or both?

FE Companies' Response: The FE Companies intend to upload data from their own data repository, making it accessible to customers and authorized third parties through a web site.

Through which browsers should this be made available?

FE Companies' Response: Given the various browsers available and the complexity surrounding each EDC's IT requirements, it is unlikely that each EDU would support the same browser. Therefore this should be left to each EDU to determine, provided that the ultimate selection adheres to common web service standards such as HTTP, HTML as well as image formats such as JPEG, PNG and GIF.

c. **Should there be other interconnectivity between the meter and other equipment in the home? If so, how much? [read capability vs. two way communication]**

FE Companies' Response: Because the FE Companies have not yet finished defining their requirements and specifications, they are not in a position to fully respond to this question. Nevertheless, the FE Companies believe that communication with equipment in the home is a beyond the meter service offering that should be viewed as competitive. Therefore, if the standard communication protocols are consistent with nationally recognized standards, it should be left to the market to resolve this issue as equipment interfacing evolves.

3. **Utility Usage Data and Meter Access**

a. **What usage data should the utility acquire through the smart metering system?**

FE Companies' Response: The FE Companies believe that the data to be retrieved will be subject to each EDC's respective rate structures. Given the variations among EDC rates, the FE Companies do not believe

that a uniform list should be developed at this time. Moreover, as indicated in Attachment B, the Commission has set forth minimum functionality requirements for the smart meter technology selected by the EDCs. The FE Companies believe that this functionality will allow each EDC to have access to the necessary data points. However, unless an EDC's rate offering requires the accumulation of such data for a specific purpose, the EDC should not be required to obtain it.

b. Should the Commission establish minimum standards on how often the utility should acquire the usage data from the meter?

FE Companies" Response: Yes. As specified in section-C, Smart Meter Capabilities, item-4, this standard should be a minimum of hourly reads delivered at least once per day. The FE Companies believe that no more frequent reads should be mandated at this time. As the market evolves and new services are introduced, this minimum standard could be revisited, provided good cause for such a change is demonstrated.

c. Should the Commission establish minimum data intervals? If so, what should that be?

FE Companies' Response: Yes, Initially, FE recommends providing minimum hourly data intervals to customers and third parties. This is consistent with how virtually all aspects of power delivery is currently measured. This standard could be modified in the future, provided that there is a valid reason for doing so.

d. What minimum timeframe should the Commission establish on when Usage data is made available by the Meter Data Service Provider to the EDC, CSPs/EGSs and customers, respectively?

FE Companies' Response: Inasmuch as EDCs have never before had to manage this volume of data for third parties, the FE Companies recommend an initial minimum time frame of 48 hours. Once systems are tested and internal operating procedures established, this timeframe could be shortened, provided that the need to do so is demonstrated.

e. Should this usage data be validated first?

FE Companies' Response: Yes. A well designed and executed validation methodology ensures the quality of data used in billing, load research, network planning and maintenance, tamper and theft detection and presentation to the end user. The customer will still have access to un-validated data through the meter via a HAN or similar in-home technology.

f. **Should the Commission establish a common Validation, Error Detection, and Editing ("VEE") protocol? If so, what should that be?**

FE Companies' Response: No. Given that each EDC will establish its own compliance plan and select the technology that best fits its circumstances, validation, error detection and editing of raw data should be left to the individual EDC, which can be reviewed through the Plan review and implementation process.

g. **Should the Commission establish a maximum period in which the MDSP should complete the VEE analysis? If so, what should that maximum period be?**

FE Companies' Response: No. See the response to Section f above. The Commission will have an opportunity to evaluate the EDCs proposed VEE process through each EDC's compliance filing.

h. **How should customers be provided direct access to usage information?**

FE Companies' Response: The FE Companies support non-proprietary open, nationally recognized standards for validated data that would be provided through a secure web portal/site. Because typical utility demographics have diverse profiles, there should be multiple ways for consumers to access their usage information, which should be addressed in, and consistent with, each EDC's compliance filing in August.

i. **Should the Commission establish standard protocols and communication medium for providing direct access to usage information from the meter to the HAN"? If so, what should those be?**

FE Companies' Response: For the reasons set forth in (h) above, the FE Companies do not believe that any such standards are necessary at this time. Moreover, meter capabilities are evolving and "beyond the meter" technology should be driven by competitive market forces.

j. **How should this Commission provide direct access to the meter to third parties? What policies or regulations should this Commission promulgate to ensure that these third parties are provided timely access under reasonable terms and conditions to the customer metering facilities?**

FE Companies' Response: Customers and third parties should have the same access to the same information as described in previous responses. The FE Companies suggest that such access be governed by general

guidelines that address security of the information and access thereto once the EDCs define, and the Commission approves, each EDC's respective technical requirements and specifications.

k. **What communications, software or hardware can facilitate this direct access to the meter for customers and their third parties, and should the Commission establish requirements and/or standards to facilitate this access?**

FE Companies' Response: Until the FE Companies complete an assessment of their technology requirements and specifications, they are not in a position to address specific software and hardware issues. However, the FE Companies believe that the Commission should establish basic requirements to facilitate access to meter data. The FE Companies encourage the Commission to assess open, nationally recognized standards and protocols that support multiple communication options, software platforms and hardware that can seamlessly integrate over time as technology evolves. FERC plans to adopt a final policy statement that provides guidance on AMI standards, including data communication protocols. It may behoove the Commission to wait for the release of such a policy, provided that the timing of such release will not delay progress in Pennsylvania.

l. **What electronic access to customer meter data do CSPs and EGSs need from EDCs that they currently do not have? Provide specific examples where these entities do not have such access currently, and provide examples, if available, of electronic transactions that can be adopted by this Commission to comply with this statutory requirement.**

FE Companies' Response: This issue is a function of the technological specifications established by each EDC – something that has yet to be completed by the FE Companies. The FE Companies believe that resolution of this issue at this time is premature and should be deferred until more information surrounding each EDC's system and technology selections are known. Moreover, if the Commission adopts nationally recognized standards and protocols, this issue should resolve itself, especially when coupled with the functional specifications already identified by the Commission in Attachment B.

4. **Meter to EDC Communications:**

a. **Should the Commission standardize public protocols from the meter to the grid?**

FE Companies' Response: Yes, provided that these public protocols are consistent with national standards and not customized for Pennsylvania. The FE Companies believe that the AMI solution should be an open architecture that allows for a multitude of communication media including wireless, wired, public and private. ANSI C12.22 is a published application layer open standard. Other commissions have set precedence by specifying this standard.

b. **If certain protocols are not effective in certain geographic or rural regions, should the Commission adopt a list of protocols that can accommodate all of Pennsylvania customer's communication requirements? If so, what additional protocols should be adopted?**

FE Companies' Response: No. Because each EDC's service territory has unique characteristics that, by definition above, are not effective in certain geographic or rural regions, this issue is best left to the EDC to define during their respective assessments of technologies and infrastructure designs. Moreover, technologies beyond AMI and Smart Metering may likewise be part of the communication requirements and, therefore, predetermined protocols should not hinder requirements related to technological advancements in areas such as distribution or transmission automation.

c. **What bidirectional communication mediums [Example: broadband over powerline, cellular, phone lines, RF] are least cost? What are the pros and cons of each?**

FE Companies' Response: The FE Companies have not yet completed the development of their requirements and the assessment of all communication options and, therefore, are not in a position to answer this question. Notwithstanding, it is important to remember that the term "least cost" can have several manifestations and should be looked at not only from the initial equipment cost perspective, but should also include consideration of the initial cost of deployment, system expansion costs, obsolescence, and field upgradeability to name a few. Each of the listed communication mediums provides advantages and will be dependant on deployment timeframes, population density, amount of data to be transmitted and latency, all of which should also be considered before the communication medium ultimately selected by the EDC is approved.

5. Access to Price information:

a. How should customers be provided direct access to pricing information? [examples, website access, HAN to an in-home display or other devices]

FE Companies' Response: The FE Companies believe that pricing information should be provided through the internet via a web portal/site because in home devices should not be mandatory. HAN type devices will be a competitive offering that should not be dictated by regulation.

b. Should the Commission require the meter to communicate price information, or should this information be provided over another communication medium?

The FE Companies' Response: In order to maintain control over the information and the accuracy thereof, the FE Companies believe that pricing information should be made available through a web site/portal. Until secure access through other alternatives is fully addressed, the FE Companies encourage the Commission to stay with proven internet technology.

c. What pricing information should the Commission require to be provided? [examples, RTP, Day ahead prices, default service rates]

FE Companies Response: The FE Companies believe that the nature of the pricing information to be provided will be a function of the programs that each EDC elects to offer and, therefore, they do not recommend that a list of requirements be established at this time. Clearly certain standard information will necessarily be provided based on certain mandatory pricing structures and the FE Companies do not oppose including a list addressing these structures.

d. Should the Commission establish minimum standards on how frequently price information should be provided? If so, what should be the minimum standard?

FE Companies' Response: No, the availability of price information will be a function of each EDC's rate structure and program offerings. The standards will naturally be established as each EDC rolls out their programs, especially when coupled with the smart meter functionality suggested in Attachment B.

e. Should the Commission establish standard formats for presentation of price information? If so, suggest a format.

FE Companies' Response: No. See response to (d) above. Also, given that in home devices will be a competitive offering, HAN vendors should be encouraged to provide innovative ways to present energy savings and cost savings opportunities to consumers in an intuitive, actionable manner.

6. **Automatic Control:**

a. **How can smart meters "effectively support" automatic control of customer's electricity consumption by customers, utilities and the customer's third party?**

b. **How is the smart metering system engaged in the initiation, maintenance, relinquishment, and verification of the automatic control of customer consumption?**

c. **What smart metering protocols and communication mediums are needed to implement these automated controls? Should the Commission establish standard protocols and standards for this purpose?**

d. **What energy consuming customer assets can be controlled by these smart meter systems for each of the customer segments, and how is control of these assets impacted by the choice of communication medium and protocol?**

FE Companies' Response to (a) – (d): The FE Companies have not yet completed their assessment of technology options. Therefore, the FE Companies are not in a position to respond to this question.

7. **Smart Metering Acceleration:**

a. **To the extent permissible under the law, should the Commission provide an incentive to EDCs to accelerate their smart meter deployment by giving a credit towards the required Energy Efficiency and Conservation Goals? If so, how should such credit be determined?**

FE Companies Response: The FE Companies would not oppose an incentive to accelerate their smart meter deployment, provided that there are no reciprocal penalties for failing to do so. Moreover, the FE Companies caution that such acceleration may significantly increase the costs and may jeopardize the quality of deployment. Therefore, before any incentive is offered, the Commission should weigh the benefits of such acceleration against the cost of doing so and only if the benefits outweigh the incremental cost, (including the value of any incentive) should such a program be launched. A meaningful incentive could be an increase in the EDC's otherwise authorized return on investment.

8. **Cost Recovery:**

a. **Should the Commission establish a standard format for providing the various components of the capital and operating costs and benefits of these smart metering systems to facilitate the comparison of the EDC plans? If so, please provide a suggested standard format.**

FE Companies' Response: No. Each EDC has unique characteristics not only within their respective service territories, but also within their existing distribution systems. Because these characteristics will dictate the capital and operating costs, as well as the related benefits, a comparison of EDC plans is impractical.

III. COMMENTS – ATTACHMENT B

The FE Companies applaud the efforts of the Commission Staff and generally agree with much of the Staff's approach to resolving many of the critical issues surrounding the filing of the Smart Meter Technology Procurement and Installation Plan ("Plan"). Other than several minor observations which are discussed at the end of this section, the FE Companies' concerns focus on two main areas: (i) the overall timing contemplated in the Implementation Order, at least as it applies to the FE Companies; and (ii) the intent underlying the Smart Meter deployment grace period.

A. Plan Time Line

It is clear from the proposed guidelines that the Commission is anxious to deploy smart technology as soon as it is practical to do so. While the FE Companies generally agree with this goal, they urge the Commission to keep several basic facts in mind. First, there are several unavoidable steps that must be taken before the first smart meter can be deployed. As will be more fully discussed in the FE Companies' August 14th filing, the companies must first perform a needs assessment to develop their technical specifications. Once this needs assessment is complete, they must evaluate meter and communication technology, ensuring that the selected systems properly interface with other necessary legacy and new systems. And only after these steps are performed can the FE Companies commence the build out. Each of these distinct phases takes time to complete. Based on the FE Companies' research, the needs assessment alone takes

approximately 18 months to complete.[2] Therefore, as more fully discussed below, the 18 month grace period proposed in the guidelines will not be sufficient to meet the FE Companies' needs.

Second, and related to the first, each EDC is in a different position from which they will commence this project. For example, both PP&L and PECO already have a system that at least partially lends itself to smart grid and smart metering technology. Thus, both of these EDCs have already performed many of the preliminary steps, such as technology research and the development of an underlying communication infrastructure, that have yet to be performed by the FE Companies. Therefore, the FE Companies' deployment time frame will lag that of other Pennsylvania EDCs. Moreover, the FE Companies' respective service territories are generally larger than the other EDCs, with significantly more rural area in at least Pennsylvania Electric's service territory. This will cause the financial dynamics related to the deployment to be different from those of other Pennsylvania EDCs.

Given the differences among the various Pennsylvania EDCs, both with respect to their service territories as well as their project starting points, the FE Companies urge the Commission to remain flexible when establishing a deployment timelines and not take a "one size fits all" approach. The goal is to develop a cost effective system that meets the needs of each EDC's respective customer base. In order to achieve this goal, each EDC must be given sufficient time to complete each basic and necessary task.

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[2] For example, the assessment period for CenterPoint Energy in Texas was over two years.

B. Proposed Grace Period

On pages 5 and 6 of the proposed guidelines, the Commission noted:

> The Commission recognizes that a fully functional smart meter involves more than just the meter hardware attached to the customer's premises. A fully functional smart meter that supports the capabilities required by Act 129 and as outlined below, involves an entire network, to include the meter, two-way communication, computer hardware and software, and trained support personnel. The Commission also recognizes that it may take time for the EDCs to select and install the required smart meter network components, and to train support personnel. The Commission directs all covered EDCs to include in its smart meter procurement and installation plan filing a proposed network design and installation grace period not to exceed 18 months. … [T]he Commission will not require EDCs to deploy smart meters until after the Commission-approved network development and installation grace period.

The FE Companies have several concerns related to the above provision. First, the companies do not believe that the grace period is sufficient. As previously discussed, it will take approximately 18 months for the FE Companies to complete their needs and technology assessments. Therefore, if the above provision is interpreted to require the EDCs to provide smart meter technology with activated smart meter functionality, the 18 month grace period is impractical and virtually impossible to comply with. Moreover, given the relatively infant state of the smart meter market, there may be delays caused by vendors that are beyond the control of the EDCs. Therefore, the FE Companies urge the Commission to remain flexible on the time frame for actual deployment and recommend that, rather than take a "one-size-fits-all" approach with a firm, fixed grace period, the Commission considers tying the deployment grace period to the completion of a milestone such as the approval of a vendor contract. In doing so, the Commission recognizes the different points from which each Pennsylvania EDC is starting. Moreover, each EDC will include a proposed timeline in its

August 14th filing. Accordingly, this issue can be addressed in the Order ultimately approving each EDC's Plan.

Second, if the Commission is committed to the 18 month grace period, then the FE Companies suggest that the above provision be clarified to require only that the EDC have selected its meter technology during this time frame and that, while the EDC will be required to provide smart meters after the end of the grace period, they will not be required to activate the "smart" functionality until a later date.

Third, the above provision should clarify the start date of the grace period, regardless of its length. As written, the FE Companies interpret the above provision to commence after their Plan is approved.

And finally, notwithstanding the above concerns, the FE Companies agree that, given the potential stranded costs associated with the installation of a standard kWh meter that will subsequently be replaced with a smart meter well before the end of its useful life, the EDC should be required to install smart meters in all new construction after they select their meter technology, provided that (i) the EDC is not required to make the meter "smart" within this period of time; (ii) the Commission allows a delay for events beyond the EDC's control; and (iii) the customer, as proposed in the guidelines, is required to pay the incremental cost for such installation.

While the FE Companies believe that deployment of smart meter technology in new construction should commence as soon as is practically feasible (factoring in the aforesaid provisions), the FE Companies do not believe that the same is true for customers that request smart meter technology. It is absurd to require customers to pay the incremental cost of installing a smart meter that will not be smart for a period of time after installation. In order to avoid such unnecessary costs and related customer confusion, the FE Companies suggest that a separate grace period be established for these customers, consistent with the concept of tying it to the completion of a defined milestone.

In sum, a one size fits all defined grace period, both for customers and EDCs is impractical and should be modified.

C. General Observations

In addition to the observations discussed above, the FE Companies submit the following comments on specific sections within the proposed guidelines:

1. Section B (2) states: "[D]uring [the 18 month] grace period, the Commission will require EDCs to provide interval meters, if necessary, and direct access to customer meters to third-parties, such as EGSs or CSPs, upon customer request." The FE Companies have several concerns with this requirement. First, while the FE Companies have the ability to provide interval meters during the grace period, absent the installation of two-way communications, the meters will provide no more information than a standard kilowatt meter. Therefore, if the customer desires a third party to have access to the interval meter data, either the customer or the

third party should be required to pay for the installation of any necessary two-way communication solution. Moreover, the FE Companies believe that the phrase "direct access" is ambiguous and should be qualified to factor in proper security issues.

2. As discussed above, the guidelines contemplate the EDCs providing customers with smart meters upon request. Section 57 Pa. C.S. §20(h) provides that "[a] service watthour meter which is removed from service shall be tested for 'as found' registration accuracy." Inasmuch as meters being replaced with smart meters will, in essence, be obsolete, the FE Companies respectfully ask the Commission to provide EDCs with a blanket waiver of this requirement. Without this waiver, the EDCs will be required to test meters that (i) were not replaced due to any perceived error or malfunction; and (ii) will not be put back into service, thus incurring unnecessary costs that will ultimately be paid by customers.

3. Section C sets forth the Smart Meter Capabilities. The FE Companies do not oppose any of the suggested capabilities. They do, however, suggest that two of the criteria be clarified. First, at the end of Criterion 7 the FE Companies suggest that the following be added: "such as ANSI Standards C12.22 and C 12.19, or their equivalents" so as to define the types of standards that are contemplated on a going forward basis. Second, Criterion 16 requires that the technology provide the customer with "direct access" to consumption and pricing information. Again, the phrase "direct access" is ambiguous and overly broad in this instance. As

indicated in the FE Companies' responses to Attachment A, the companies do not oppose this requirement, provided that it is interpreted to require direct access to unvalidated data, with validated data being provided by the EDC through a web site/portal. Further, such access should be limited to access that is based on proper security measures, such as password protection.

4. In footnote 3 the guidelines indicate that "[l]ay persons will be permitted to directly ask questions of the EDC representatives." The FE Companies do not object to this process, provided that none of the statements of such lay individuals or the responses thereto are included in the evidentiary record without first being properly sworn in.

IV. CONCLUSION

The FE Companies appreciate the opportunity to submit comments on these important issues. For the reasons set forth above, the FE Companies respectfully request that their comments be considered and incorporated into the final implementation order.

Respectfully submitted,

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Dated: April 20, 2009

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CERTIFICATE OF SERVICE

In accordance with the instructions set forth in the Commission's March 30, 2009 Secretarial Letter, I hereby certify that I have this day served via hand delivery an original and 15 true and correct copies of the comments of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company ("Comments") upon:

James J. McNulty, Secretary
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and have electronically posted a copy of the Comments on the Commission's Act 129 e-mail account at:

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