

**Gary A. Jack**  
Assistant General Counsel

April 29, 2009

**VIA Hand Delivery**

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
400 North Street  
Harrisburg, PA 17120

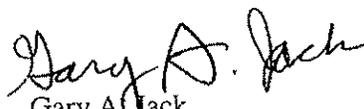
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Re: Smart Meter Procurement and Installation Plan  
Docket No. M-2009-2092655

Dear Secretary McNulty:

Enclosed for filing are the original and fifteen copies of the reply comments of Duquesne Light Company in the above-referenced proceeding. Additionally, as per the Secretarial Letter dated April 9, 2009, an electronic copy of the attached comments are being sent to the Commission's Act 129 e-mail account at ra-Act129@state.pa.us. Please contact me if you have any questions regarding this submission.

Sincerely yours,

  
Gary A. Jack  
Assistant General Counsel

Enclosures

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Smart Meter Procurement and : Docket No. M-2009-2092655  
Installation Plan :

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**REPLY COMMENTS OF DUQUESNE LIGHT COMPANY**

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Pursuant to the Secretarial Letter and Draft Implementation Order issued on March 30, 2009 at this docket, as well as the Secretarial Letter issued on April 9, 2009 at this docket, Duquesne Light Company (“Duquesne”) herein submits its Reply Comments.

**I. Introduction**

On March 30, 2009, the Pennsylvania Public Utility Commission (“PUC” or “Commission”) circulated a Working Group Draft Implementation Order pursuant to Act 129 (“Draft Implementation Order” or “Staff Proposal”), establishing standards and guidance for smart meter technology and implementation plans.<sup>1</sup> As part of the Staff Proposal, the Commission presented to interested parties a set of specific questions regarding smart meter procurement and installation.<sup>2</sup> Initial comments by interested parties were due on April 20, 2009.<sup>3</sup> Various parties filed substantive comments.<sup>4</sup> Reply comments were due on April 29, 2009.<sup>5</sup>

**II. Supplemental comments and requested clarification**

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<sup>1</sup> March 30, 2009 Secretarial Letter, Docket No. M-2009-2092655 at 1.

<sup>2</sup> *Id.* at Attachment A.

<sup>3</sup> April 9, 2009 Secretarial Letter, Docket No. M-2009-2092655 at 1.

<sup>4</sup> See Docket No. M-2009-2092655.

<sup>5</sup> April 9, 2009 Secretarial Letter, Docket No. M-2009-2092655 at 1.

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Duquesne would like to take this reply comment opportunity to address various issues addressed by Constellation NewEnergy (“Constellation”), and to seek clarification of several issues raised by Constellation.

While Duquesne supports the Smart Meter Legislation (Section F, 3 HB2200) requirement of making customer meter data available, with customer consent, to third parties, including electric generation suppliers and providers of conservation and load management services, Duquesne suggests that delivery options for meter data be further analyzed. For example, Constellation comments throughout Attachment A, in questions 1 (a), 2(b), 3(d), (i), (j) & (k) that its preference would be to have meter information made available through a Web Service.<sup>6</sup> While this is one option, Duquesne believes that there are multiple mediums through which the data can be made available. Whether all parties agree upon Web Portals or a Web Service for transmission of meter information, or another medium entirely, it is critical that the time is expended to evaluate the myriad of offerings, and that in turn the appropriate decision is made based upon such evaluation. Duquesne would recommend that the Commission not dictate a specific offering but rather set the requirement and allow the utilities the flexibility to transfer the data by whatever mechanism may work well for it and those requesting the data.

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<sup>6</sup> Initial Comments of Constellation NewEnergy, Inc., April 20, 2009, Docket No. M-2009-2092655, p. 2, 4, and 5.

Additionally, Duquesne requests that a clarification be made on Constellation's request for Pulse output. Specifically, in section 3(d) "Constellation recommends that data should be made available on a real-time basis, on-demand, and at the meter directly through a web service and a pulse output[.]" and in section 3(h) Constellation states that "[m]oreover, each meter should have a pulse output."<sup>7</sup> Duquesne has talked to multiple major vendors and their residential meters do not have pulse output capability which makes this suggestion rather hard to meet. Duquesne understands the need for k,y,z pulse output on the larger C & I customer meters and those meters do have the capability for pulse output. Duquesne seeks clarification that Constellation's suggested pulse requirement is not a requirement for residential customers.

Finally, Constellation suggests a customer authorization process in its response to Staff question 3(j).<sup>8</sup> While Duquesne certainly supports and agrees that customer consent is essential before providing access to customer data and that the EGSs, CSPs or any third parties need to be provided timely access under reasonable terms and conditions, Duquesne cautions that there are many different methods to obtain such consent. While the requirement to have secured consent should be established, the method for obtaining the consent should not be dictated. Rather, the Commission should allow the utilities the flexibility to obtain the customer consent by whatever mechanism may work well for it and its customers.

### **III. Conclusion**

Act 129 has established a clear directive regarding smart meter technology

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<sup>7</sup> Id. at 4.

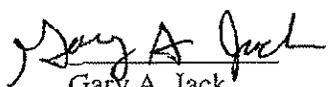
<sup>8</sup> Id. at 5.

procurement and installation plans. Duquesne appreciates the Commission's efforts to solicit stakeholder input on the proposed standards and guidance and the opportunity to further comment on this matter.

Respectfully submitted,

Duquesne Light Company

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