

PENNSYLVANIA UTILITY LAW PROJECT

118 LOCUST STREET  
HARRISBURG, PA 17101-1414

JOHN C. GERHARD, ESQ.  
JGERHARDPULP@PALEGALAID.NET

PHONE: (717) 236-9486, EXT. 201  
FAX: (717) 233-4088  
MOBILE: (717) 576-2588

September 25, 2009

**VIA ELECTRONIC FILING (E-FILING)**

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

**Re: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, and Pennsylvania Power Company for Approval of Smart Meter Technology Procurement and Installation Plan**

**Docket No. M-2009-2123950**

Dear Secretary McNulty:

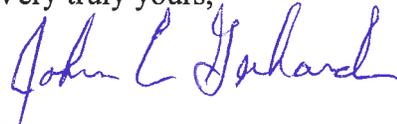
Enclosed for filing in the above-captioned proceeding, please find a:

- Petition to Intervene,
- Pre Hearing Memorandum, and
- Comments

on behalf of the Pennsylvania Association of Community Organizations for Reform Now ("ACORN"). Parties of record have been served as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me directly.

Very truly yours,



John C. Gerhard, Esq.  
*Counsel for ACORN*

Enclosure

cc: Honorable Susan D. Colwell  
Cert. of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Joint Petition of Metropolitan Edison :  
Company, Pennsylvania Electric :  
Company, and Pennsylvania Power :  
Company for Approval of Smart Meter :                   Docket No. M-2009-2123950  
Technology Procurement and :  
Installation Plan :**

**CERTIFICATE OF SERVICE**

I hereby certify that I have today served true copies of ACORN’s Petition to Intervene, Pre Hearing Memorandum, and Comments upon the parties of record in this proceeding listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**Via Electronic Mail and First Class Mail**

<p>Bradley B. Bingaman, Esq. FirstEnergy Service Company 2800 Pottsville Pike PO Box 16001 Reading, PA 19612-6001 <a href="mailto:bbingaman@firstenergycorp.com">bbingaman@firstenergycorp.com</a> <i>Counsel for FirstEnergy</i></p>	<p>Kathy J. Kolich, Esq. FirstEnergy Service Company 76 South Main Street Akron, OH 44308 <a href="mailto:Kkolich@firstenergycorp.com">Kkolich@firstenergycorp.com</a> <i>Counsel for FirstEnergy</i></p>
<p>Candis A. Tunila Aron J. Beatty, Esq. Tanya J. McCloskey, Esq. Office of the Consumer Advocate 555 Walnut Street 5<sup>th</sup> Floor, Forum Place Harrisburg, PA 17101-1923 <a href="mailto:atunilo@paoca.org">atunilo@paoca.org</a> <a href="mailto:abeatty@paoca.org">abeatty@paoca.org</a> <a href="mailto:tmccloskey@paoca.org">tmccloskey@paoca.org</a> <i>Counsel for the Office of the Consumer Advocate</i></p>	<p>Charles Daniel Shields, Esq. Carrie B. Wright, Esq. Pennsylvania Public Utility Commission Office of Trial Staff Commonwealth Keystone Bldg. 400 North Street Harrisburg, PA 17120 <a href="mailto:cshields@state.pa.us">cshields@state.pa.us</a> <a href="mailto:cwright@state.pa.us">cwright@state.pa.us</a> <i>Counsel for the Office of Trial Staff</i></p>

<p>Daniel G. Asmus, Esq.          Lauren Lepkoski, Esq.          Office of the Small Business Advocate          Commerce, Bldg., Suite 1102          300 North 2<sup>nd</sup> Street          Harrisburg, PA 17101  <a href="mailto:dasmus@state.pa.us">dasmus@state.pa.us</a>  <a href="mailto:llepkoski@state.pa.us">llepkoski@state.pa.us</a>  <i>Counsel for the Office of the Small Business Advocate</i></p>	<p>Scott Perry, Esq.          Aspasia V. Staevska, Esq.          Commonwealth of Pennsylvania          RCSOB, 9<sup>th</sup> floor          400 Market Street          Harrisburg, PA 17101  <a href="mailto:scperry@state.pa.us">scperry@state.pa.us</a>  <a href="mailto:astaevska@state.pa.us">astaevska@state.pa.us</a>  <i>Counsel for DEP</i></p>
<p>Charis Mincavage, Esq.          Barry A. Naum, Esq.          Shelby A. Linton-Keddie, Esq.          McNeas Wallace &amp; Nurick, LLC          100 Pine Street          PO Box 1166          Harrisburg, PA 17108-1166  <a href="mailto:cmincavage@mwn.com">cmincavage@mwn.com</a>  <a href="mailto:bnaum@mwn.com">bnaum@mwn.com</a>  <a href="mailto:skeddie@mwn.com">skeddie@mwn.com</a>  <i>Counsel for MetEd Industrial Users Group,          Penelec Industrial Customer Alliance, and          Penn Power Users Group</i></p>	<p>George Jugovic, Esq.          Commonwealth of Pennsylvania          Department of Environmental Protection          400 Waterfront Drive          Pittsburgh, PA 15222-4745  <a href="mailto:gjugovic@state.pa.us">gjugovic@state.pa.us</a>  <i>Counsel for DEP</i></p>
<p>Renardo L. Hicks, Esq.          Stevens &amp; Lee          17 North 2<sup>nd</sup> Street – 16<sup>th</sup> Floor          Harrisburg, PA 17101  <a href="mailto:rhl@stevenslee.com">rhl@stevenslee.com</a>  <i>Counsel for FirstEnergy</i></p>	

John C. Gerhard, Esq.  
*Counsel for ACORN*

Pennsylvania Utility Law Project  
 118 Locust Street  
 Harrisburg, PA 17101

Dated: September 25, 2009