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2. On August 14, 2009, pursuant to the requirements of Act 129, PPL Electric Utilities Corporation (“PPL” or “company”) filed with the Commission a petition seeking approval of the company’s Smart Meter Technology Procurement and Installation Plan. *Petition of PPL Electric Utilities Corporation for Approval of its Smart Meter Technology Procurement and Installation Plan*, Docket No. M-2009-2123945 (Filed August 14, 2009) (“Petition”).

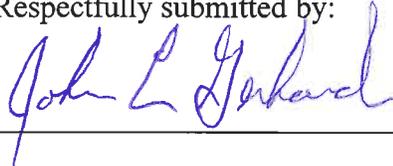
3. PPL is unique among electric distribution companies in the Commonwealth in that it already has extensive operational functionality with smart meters and an advanced metering infrastructure (“AMI”), originally beginning deployment of its smart system in 2002. Petition at 1. PPL’s Smart Meter Plan describes PPL’s existing infrastructure and capabilities and its continuing strategy for the next five years. *Id.* PPL affirms its existing AMI meets the minimum requirements set out in Act 129 and in the Commission’s *Smart Meter Procurement and Installation, Implementation Order*, Docket No. M-2009-2092655 (Order entered June 24, 2009) (“Implementation Order”). *Id.* PPL proposes to use the 30 month grace period established by the Implementation Order to conduct a series of pilot programs and technology evaluations. *Id.*; Implementation Order at 7. Among the pilots and evaluations mentioned by PPL are a remote disconnection/reconnection pilot in 2011, a service limiting/service extending pilot in 2013-2014, and a prepay metering pilot in 2013. Petition at 21, 26, and 27.

4. The Petitioner, Pennsylvania ACORN, is a not-for-profit chapter of the Association of Community Organizations for Reform Now (“ACORN”), an advocacy and membership organization whose mission is to advocate on behalf of low and lower income persons on numerous consumer issues, including access to and the affordability of public utility service.
5. Many ACORN constituents reside within the PPL’s service territory and receive electric distribution service from the company. The company’s proposed Smart Meter Plan will have direct, immediate, substantial, and distinct effects upon the interests of ACORN constituents.
6. Although PPL has had nearly seven years of experience with its AMI, there are significant questions remaining unanswered regarding the impact Smart Networks, Smart Metering, and dynamic pricing will have on low income customers. What is the real cost of procuring and implementing a smart meter system, particularly with a more mature system like PPL’s, and how will these costs fall on low income customers? How will low income customers access, take advantage of, and benefit from the data made available through smart meters and networks? What will be the impact of real time pricing and time of use rates upon low income customers? Will smart metering herald new types of service that have adverse impacts upon low income customers? Each of these questions requires full investigation and consideration in this proceeding.

7. The grounds for ACORN's petition to intervene are to ensure its interests and those of its constituents are represented in this proceeding, particularly those issues raised in Paragraph 6 supra. Since the interests of our constituents are not adequately represented at the present time but our constituents will be bound by the Commission's decision, ACORN seeks to intervene in this proceeding.

8. WHEREFORE, ACORN respectfully requests the Pennsylvania Public Utility Commission:
 - a. Grant this Petition to Intervene and
 - b. Make such other orders as are just and appropriate.

Respectfully submitted by:



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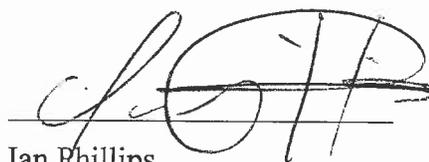
Counsel for ACORN

Dated: September 25, 2009

VERIFICATION

I, Ian Phillips, hereby state that the facts above set forth in the Petition to Intervene are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: September 14, 2009

A handwritten signature in black ink, appearing to read 'Ian Phillips', written over a horizontal line.

Ian Phillips
Legislative Director
Pennsylvania ACORN
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