



COMMONWEALTH OF PENNSYLVANIA

April 24, 2014

E-FILED

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Their Smart Meter Deployment Plans
Docket Nos. M-2013-2341990, M-2013-2341991, M-2013-2341993, and M-2013-2341994**

Dear Secretary Chiavetta:

Enclosed for filing is the Prehearing Memorandum, on behalf of the Office of Small Business Advocate, in the above-captioned proceedings.

As evidenced by the enclosed certificate of service, all parties have been served as indicated.

Sincerely,

A handwritten signature in cursive script that reads "Daniel G. Asmus /saw".

Daniel G. Asmus
Assistant Small Business Advocate
Attorney ID No. 83789

Enclosures

cc: Parties of Record

Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison Company, :	DOCKET NOS. M-2013-2341990
Pennsylvania Electric Company, Pennsylvania :	M-2013-2341991
Power Company, and West Penn Power Company:	M-2013- 2341993 For
Approval of Their Smart Meter Deployment Plan :	M-2013-2341994

**PREHEARING MEMORANDUM
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding. Representing the OSBA in the above-referenced matter is Assistant Small Business Advocate Daniel G. Asmus. Please address all correspondence in this matter as follows:

Daniel G. Asmus
Assistant Small Business Advocate
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
dasmus@pa.gov

II. FILING BACKGROUND

By August 14, 2009, all electric distribution companies with at least 100,000 customers were required to file smart meter technology procurement and installation plans (“SMIP”) with the Commission pursuant to Act 129 of 2008. Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company (collectively “the Companies”) filed a Joint Petition for Approval of a SMIP on August 14, 2009. West Penn Power Company’s SMIP was filed at a later date.

The OSBA filed a Notice of Intervention and Public Statement in the above-captioned proceeding on September 25, 2009.

On April 16, 2014, the Commission issued a Secretarial Letter in the above-captioned matter referring Pennsylvania Power Company’s (“Penn Power’s”) proposal for an accelerated smart meter deployment schedule to the Office of Administrative Law Judge to develop and certify an evidentiary record on or before May 15, 2014.

III. IDENTIFICATION OF WITNESSES AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
(617) 354-0463 – Fax
rdk@indecon.com

The OSBA will participate in this proceeding to assure that the interests of small business customers are adequately represented and protected.

After an initial review of the materials submitted by Penn Power, the OSBA has identified the following list of issues that it will evaluate in this proceeding, subject to time and budget constraints:

1. Whether the costs that the Penn Power seeks to recover are “reasonable and prudent,” as required by Section 2807(f)(7) of the Public Utility Code, 66 Pa. C.S. §2807(f)(7);
2. Whether the overall plan cost is being reduced to reflect “operating and capital cost savings,” as required by Section §2807(f)(7);
3. Whether the proposed cost recovery through a surcharge under Section 1307 of the Public Utility Code, 66 Pa. C.S. §1307, is likely to result in an appropriate recovery of costs from Small C&I customers;
4. Whether the costs to be recovered are being properly allocated among the rate classes.

The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding.

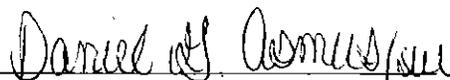
IV. SERVICE OF DOCUMENTS

The OSBA requests that all parties serve a hard copy of any document filed upon the OSBA and the OSBA witness identified above. In addition to hard copies of pleadings and briefs, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. Service by electronic mail only is not acceptable.

V. **SETTLEMENT**

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of the proceeding.

Respectfully submitted,



Daniel G. Asmus
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Attorney ID #83789

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Dated: April 24, 2014

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Joint Petition for Metropolitan Edison Company,;
Pennsylvania Electric Company, Pennsylvania : Docket Nos. M-2013-2341990,
Power Company, and West Penn Power M-2013-2341991,
Company for Approval of their Smart Meter : M-2013-2341993,
Deployment Plan : M-3013-2341994**

CERTIFICATE OF SERVICE

I certify that I am serving two copies of the Prehearing Memorandum, on behalf of the Office of Small Business Advocate, by e-filing, e-mail and/or first-class mail (unless otherwise noted) upon the persons addressed below:

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Date: April 24, 2014