

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of Its Smart Meter Technology : **M-2014-2430781**
Procurement and Installation Plan :

Prehearing Memorandum

On July 8, 2014, a Prehearing Conference Order was issued by the Honorable Susan D. Colwell, Administrative Law Judge, setting a prehearing conference for Monday, August 11, 2014 at 10:00 a.m., and requiring each party to prepare and distribute a prehearing memorandum setting forth the history of the proceeding, the issues it intends to present, and proposed witnesses, along with the subject of their testimony.

In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Conference Memorandum.

I. Background

On June 30, 2014, PPL Electric filed its Petition for Approval of its Smart Meter Technology Procurement and Installation Plan. Notice of the filing was published in the Pennsylvania Bulletin on July 19, 2014, with a deadline for intervention or protect of August 11, 2014. 44 Pa. B. 4629. Concurrent herewith, CAUSE-PA has filed a Petition to Intervene and Answer to PPL’s Petition and provided service to ALJ Colwell and the parties of record at that time. CAUSE-PA submits this Prehearing Memorandum in furtherance of ALJ Colwell’s July 8, 2014, Prehearing Conference Order.

II. Issues to be Presented

CAUSE-PA has conducted an initial review of PPL's Petition and testimony and has identified several issues that may impose significant hardship on low and moderate income residential customers. Additionally, it has identified several issues that, if modified throughout the course of the proceeding, could also create a hardship for low and moderate income residential customers. In relevant part, CAUSE-PA has a discernible interest in and reserves the right to raise issue with the following:

- a. PPL's conclusion that its existing meter system must be replaced, Petition ¶ 15, must be examined in light of the significant cost of approximately \$449 million involved with doing so, Petition ¶ 68.
- b. The cost burden that will be borne by PPL's low-income customers as a result of this comprehensive meter replacement;
- c. PPL's plan to require all customers to be responsible for purchasing and installing their own HAN devices as well as establishing the network connection as this may preclude low-income customers from accessing the full capability of the metering system if they do not have sufficient resources to purchase these devices. Petition ¶ 31.
- d. The possible scope and breath of remote connect/disconnect programs that would result from the installation of these meters. Petition ¶ 35.
- e. PPL's plan for data storage, data privacy, and cybersecurity of the information obtained from these meters, and HAN network established by the customer, and any web interface established as a result of this meter technology. Petition ¶¶ 56-57.

- f. The scope and clarity of the customer outreach and education efforts that will be undertaken by PPL Electric. Petition ¶¶ 75.

III. Witnesses and Testimony

CAUSE-PA has not yet determined whether it will present a witness in this proceeding and reserves the right to present a witness upon timely notice to ALJ Colwell and parties.

IV. Proposed Schedule

CAUSE-PA is amenable to the proposed schedule set forth by ALJ Colwell in her Prehearing Conference Order, and is open to further modification of that schedule if necessary to accommodate all parties. CAUSE-PA supports the submission of the testimony of witnesses in writing in advance of the hearing.

V. Public Input Hearings

CAUSE-PA does not oppose the scheduling of public input hearings, but is not presently requesting that one be scheduled.

VI. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions with any and all parties in an attempt to resolve or narrow the issues in this proceeding, and encourages the parties to engage in settlement early in the process.

VII. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project.

Electronic service and one hard copy of all documents should be served on CAUSE-PA as follows:

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WHEREFORE, CAUSE-PA respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
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DATED: August 8, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the **Prehearing Memorandum of CAUSE-PA**, as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA EMAIL and FIRST CLASS MAIL

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