

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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September 18, 2015

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17101

Re: Petition of Duquesne Light Company for
Approval to Modify its Smart Meter
Procurement and Installation Plan
Docket No. P-2015-2497267

Dear Secretary Chiavetta:

Enclosed for filing is the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in black ink that reads "David T. Evrard".

David T. Evrard
Assistant Consumer Advocate
PA Attorney I.D. # 33870

Enclosure

cc: Office of Administrative Law Judge
Certificate of Service
*212236

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company for :
Approval to Modify its Smart Meter : Docket Nos. P-2015-2497267
Procurement and Implementation Plan : M-2009-2123948

NOTICE OF INTERVENTION

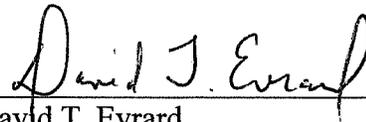
Pursuant to 52 Pa. Code §§ 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence, notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

David T. Evrard
Assistant Consumer Advocate
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Aron J. Beatty
Senior Assistant Consumer Advocate
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5th Floor, Forum Place
555 Walnut Street
Harrisburg, Pa. 17101-1923
Telephone: (717) 783-5048

Respectfully submitted,



David T. Evrard
Assistant Consumer Advocate
PA Attorney I.D. #33870

DATED: September 18, 2015

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-1 *et seq.*, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to intervene and participate in the Petition of Duquesne Light Company for Approval to Modify its Smart Meter Procurement and Implementation Plan.

On August 4, 2015, Duquesne Light Company filed its Petition with the Public Utility Commission. Duquesne seeks a number of modifications to its current Smart Meter Plan. Key among them are the following: (1) implementation, over a period of five years, of an Advanced Distribution Management System (ADMS), which involves, in sequential order, development of an electrical model of the Duquesne system, installation of an Outage Management System (OMS) and finally installation of a Distribution Management System (DMS); (2) a projected increase in the overall cost of the Plan from \$240 million to \$319 million; and (3) addition of a \$15 million contingency component to its Plan budget to cover changes in scope or requirements, unforeseen cost increases or implementation difficulties. Duquesne proposes to recover all costs associated with these modifications through its Smart Meter Charge, which is paid by customers.

The Consumer Advocate determined to intervene in this matter to protect the interests of Duquesne Light's customers. Specifically, the Consumer Advocate seeks to: (1) ensure the cost-effectiveness of the proposed ADMS; (2) determine whether Duquesne has identified any less costly alternatives to the ADMS; (3) determine whether the contingency component is legitimately needed; and (4) determine whether all Plan modification costs incurred are properly recovered through Duquesne's Smart Meter Charge.

CERTIFICATE OF SERVICE

Petition of Duquesne Light Company for :
Approval to Modify its Smart Meter : Docket No. P-2015-2490141
Procurement and Installation Plan :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 18th day of September 2015.

SERVICE BY E-MAIL and INTEROFFICE MAIL

Johnnie E. Simms, Esquire
Bureau of Investigations and Enforcement
Pennsylvania Public Utility Commission
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400 North Street
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SERVICE BY E-MAIL and FIRST CLASS MAIL

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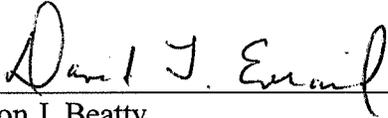
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