



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Main Fax  
www.postschell.com

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Anthony D. Kanagy

akanagy@postschell.com  
717-612-6034 Direct  
717-731-1985 Direct Fax  
File #: 141701

April 7, 2016

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**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 please find the Reply Brief of Duquesne Light Company in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in cursive script that reads "Anthony D. Kanagy".

Anthony D. Kanagy

ADK/skr  
Enclosure

cc: Honorable Katrina L. Dunderdale  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### VIA E-MAIL and FIRST CLASS MAIL

Johnnie E. Simms, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

Sharon Webb, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101

Aron J. Beatty, Esquire  
David Evrard, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923

Pamela C. Polacek, Esquire  
Teresa K. Schmittberger, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108-1166

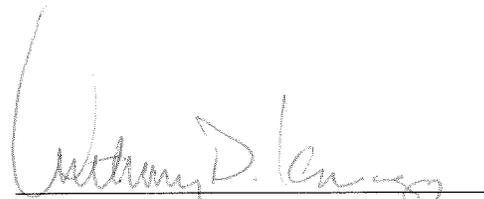
Divesh Gupta, Esquire  
Constellation Energy Group, Inc.  
100 Constellation Way, Suite 500C  
Baltimore, MD 21202

Christopher A. Lewis, Esquire  
Blank Rome LLP  
One Logan Square  
Philadelphia, PA 19103

Patrick M. Cicero, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

Theodore S. Robinson, Esquire  
Citizen Power Inc.  
2121 Murray Avenue  
Pittsburgh, PA 15217

Date: April 7, 2016

  
\_\_\_\_\_  
Anthony D. Kanagy

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**REPLY BRIEF OF  
DUQUESNE LIGHT COMPANY**

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Tishekia E. Williams (ID # 208997)  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219  
Phone: (412) 393-1541  
Fax: (412) 393-5757  
E-mail: TWilliams@duqlight.com

Michael W. Gang (ID # 25670)  
Anthony D. Kanagy (ID #85522)  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: (717) 731-1970  
Fax: (717) 731-1985  
E-mail:mgang@postschell.com  
E-mail:akanagy@postschell.com

Date: April 7, 2016

Counsel for Duquesne Light Company

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## **I. INTRODUCTION**

On March 17, 2016, Duquesne Light Company (“Duquesne Light” or the “Company”), the Office of Consumer Advocate (“OCA”) and Citizen Power, Inc. (“Citizen Power”) filed Main Briefs in the above-captioned proceeding. Duquesne Light hereby files its Reply Brief in response to the Main Briefs filed by OCA and Citizen Power in accordance with the procedural schedule adopted by Administrative Law Judge Katrina L. Dunderdale (the “ALJ”).

## **II. PROCEDURAL HISTORY**

A detailed procedural history is set forth on pages 1-4 of the Company’s Main Brief.

## **III. STATEMENT OF THE QUESTIONS INVOLVED**

Duquesne Light’s position regarding the relevant questions involved in this proceeding is set forth on page 5 of the Company’s Main Brief.

## **IV. BURDEN OF PROOF**

Duquesne Light’s position regarding the burden of proof in this proceeding is set forth on pages 5-6 of its Main Brief.

## **V. SUMMARY OF ARGUMENT**

The primary issue in dispute is whether Duquesne Light’s Advanced Distribution Management System (“ADMS”) project should be approved. In response to the Commission’s directive, Duquesne Light has evaluated the cost effectiveness of including outage and restoration communication and voltage monitoring capabilities through the ADMS project as part of the Company’s Smart Meter Plan (“SMP”). The ADMS project will provide substantial benefits to the Company and its customers which outweigh the project’s associated costs. OCA and Citizen Power argue that the ADMS project is not cost effective and should be denied. OCA and Citizen Power improperly refuse to recognize \$6 million per year in customer savings that

will result from a five minute reduction in average outage time following implementation of the ADMS. OCA argues that customer savings related to the ADMS project cannot be reliably measured. However, Duquesne Light has supported the quantification of customer savings through two independent models. Duquesne Light has demonstrated that the ADMS project is cost effective even if ADMS project costs reach the high end of the estimated cost range. Therefore, the ADMS project should be approved as part of the Company's SMP.

The second set of disputed issues involves the recovery of ADMS costs. The ADMS project is a smart meter technology project. The Commission has previously approved recovery of smart meter costs through the Company's Smart Meter Charge ("SMC"), rather than through base rates, pursuant to Act 129. The Commission has also previously rejected a prior OCA proposal to allocate smart meter costs based on the benefits provided to each customer class and instead directed that smart meter costs be allocated on a per meter basis. OCA and Citizen Power argue that ADMS project costs should be recovered through a base rate proceeding and allocated in accordance with the project's resulting customer benefits. OCA's and Citizen Power's cost recovery and allocation proposals are contrary to the Commission's prior orders and should be rejected.

The final contested issue concerns recovery of Bill Ready costs. In response to the Commission's directive, Duquesne Light has included Bill Ready functionality as part of its SMP and proposes to recover these costs through its SMC. OCA suggests that Bill Ready costs be recovered from electric generation suppliers ("EGSs"), yet OCA presents no precedent in support of its proposal. Bill Ready costs are smart meter technology costs. Electric distribution companies ("EDCs") are authorized by statute and by Commission order to recover smart meter

costs from customers through reconcilable smart meter charges. OCA's proposal is contrary to Act 129 and Commission orders regarding smart meter cost recovery and should be denied.

## **VI. ARGUMENT**

### **A. SUMMARY OF DUQUESNE LIGHT'S AMENDED SMP AND DISPUTED ISSUES IN THIS PROCEEDING**

A summary of Duquesne Light's modified SMP and the disputed issues in this proceeding is provided on pages 9-13 of the Company's Main Brief and in the Summary of Argument of this Reply Brief.

### **B. ADMS ISSUES**

#### **1. ADMS Project Approval Issues**

The ADMS project is cost effective and OCA's and Citizen Power's proposals that the Commission deny approval of the ADMS should be rejected.

The substantial benefits provided to Duquesne Light and its customers by the ADMS project clearly outweigh the project's associated costs. OCA and Citizen Power argue that the ADMS is not cost effective and, as a result, should not be approved. (OCA M.B., p. 15; Citizen Power M.B., p. 8.) However, OCA and Citizen Power fail to consider all of the benefits that the Company and its customers will experience following implementation of the ADMS project. When properly considering the \$6 million per year in customer savings that will result from a reduction in the average outage time and numerous other customer benefits, the ADMS is cost effective.

Specifically, OCA and Citizen Power express concern that the required costs for completion of the ADMS project may be closer to the high end of Duquesne Light's estimated cost range of \$46 million-\$56 million. (OCA M.B., p. 10; Citizen Power M.B., p. 8.) According to OCA, if the ADMS project costs reach the high end of this range, the project would no longer

be cost effective. (OCA M.B., p. 10.) OCA further asserts that Duquesne Light has not included incremental O&M costs as part of its analysis. (OCA M.B., pp. 10-11). Citizen Power states that “the cost effectiveness is unclear.” (Citizen Power M.B., p. 8.) OCA’s and Citizen Power’s concerns are unwarranted. Even if the project costs were to reach the high end of the range and even considering the incremental O&M costs suggested by OCA, the ADMS project would still be cost effective. (Duquesne Light St. No. 2-R, p. 8.)

OCA’s and Citizen Power’s cost-benefit analyses improperly ignore \$6 million per year in customer savings associated with the Outage Management System component of ADMS, which has the ability to reduce the average outage duration by five minutes. While five minutes represents the average reduction in outage time, the actual reduction in outage time during a particular outage event could be much longer. Their arguments also ignore the significant non-quantifiable customer benefits that will result from implementation of the ADMS.

Reducing average outage time will substantially reduce the amount of financial loss customers experience during an outage. (Duquesne Light St. No. 2-R, p. 4.) Duquesne Light’s independent consultant, DNV GL, has estimated that a five minute reduction in average outage time will save Duquesne Light’s customers \$6 million per year in typical outage-related costs, including food spoilage, hotel bills during extended outages, lost sales and lost production. (Duquesne Light St. No. 2-R, p. 4.) In addition, numerous non-quantifiable customer benefits will result from the ADMS project, including increased customer satisfaction, increased safety to the public and Company employees, and enhanced operations in various Duquesne Light departments. (Duquesne Light St. No. 2, pp 7-9).

OCA asserts that the \$6 million in annual customer savings as a result of shortened outage time as well as other customer benefits should not be considered because they are

difficult to quantify. (OCA M.B., p. 14.) OCA's proposal is unreasonable. OCA cites to Duquesne Light's Phase I study for support that the \$6 million in customer savings is "difficult to quantify" and should not be considered. (OCA M.B., pp. 12-13.) However, OCA misrepresents the Phase I study. The "difficult to quantify" benefits referred to in the Phase I study are the "soft" benefits, such as increased safety and customer satisfaction and enhanced Company operations, for which Duquesne Light has not assigned a dollar value. (Duquesne Light St. No. 2A, Ex. JTK 4, p. 1.) These "soft" benefits are different from the societal benefits cited in the Phase I study. The societal benefits are the \$6 million in customer savings that will result from reduced outage times. (Duquesne Light St. No. 2A, Ex. JTK 4, p. 2.)

The \$6 million per year in projected customer savings has been reliability measured through a comprehensive study performed by DNV GL using Duquesne Light-specific data. (Duquesne Light St. No. 2R, p. 4.) Because DNV GL's study contains proprietary formulas, Duquesne Light has also presented the results of the publicly available Interruption Cost Estimate ("ICE") model study. This study confirms the results of the DNV GL study.

OCA criticizes the ICE model for not containing information from the northeast region, where Duquesne Light's customers reside. (OCA M.B., p. 13.) The ICE model was developed for the U.S. Department of Energy, and thus, is a nationally accepted model. (Duquesne Light St. No. 2R, p. 6.) Furthermore, DNV GL's study cures the supposed data problem pointed out by OCA because it uses data specific to Duquesne Light's service territory, such as number of circuits at different voltages, current miles, capacitor information, voltage regulators, and number of customers. (Duquesne Light St. No. 2R, p. 4.) The results of the ICE model reinforce the results of the DNV GL model. (Duquesne Light St. No. 2RJ, pp. 2-3.)

The difficulty in quantifying customer benefits other than those achieved by shortening outages does not mean that these other “soft” benefits should be ignored. ADMS will increase safety for Duquesne Light and its customers by allowing the Company to dispatch crews to wire down calls more quickly and more accurately locate dispatched crews. (Duquesne Light St. No. 2, pp. 7-9.) Customer satisfaction will improve due to automatic messaging and the ability of customer service representatives to provide detailed outage information to callers using the outage management system (“OMS”) dashboard. (Duquesne Light St. No. 2, pp. 7-9.) ADMS will also result in enhanced Company operations because operators will be able to manage outages from a single application and field workers will be able to use mobile data units to provide arrival times, trouble causes and other information. (Duquesne Light St. No. 2, pp. 7-9.) These benefits are further explained in Duquesne Light Statement No. 2.

OCA and Citizen Power have not even attempted to quantify the obvious customer cost savings that will result from the ADMS project and have provided no calculation of customer savings to consider in the cost-benefit analysis. The best estimate of customer savings should be considered in the cost-benefit analysis, which in this case is the result of the Duquesne Light-specific study performed using the DNV GL model.

OCA also argues that the Commission has not recognized claims of customer savings in other contexts. (OCA M.B., p. 14). OCA cites to the Commission’s *Energy Efficiency and Conservation Implementation Order* at Docket No. M-2008-2069887 (Order entered January 16, 2009) (“*EE&C Implementation Order*”) in support. However, the context of the Commission’s *EE&C Implementation Order* is distinguishable from the present case. The *EE&C Implementation Order* dealt with EDCs’ Energy Efficiency and Conservation (“EE&C”) plans, not smart meter functionalities such as the outage and restoration communication and voltage

monitoring capabilities at issue here. Notably, the Commission in its *EE&C Implementation Order* interpreted Act 129 as specifying that only monetary cost savings are to be considered when determining the cost effectiveness of EDCs' EE&C plans. That same restriction does not apply to a cost-benefit analysis of smart meter functionalities. Therefore, the *EE&C Implementation Order* does not preclude customer savings or other benefits from being considered.

OCA attempts to use its argument that residential customers receive fewer benefits from ADMS as further support for its assertion that ADMS is not cost effective. (OCA M.B., p. 18.) OCA's argument is fundamentally flawed. Cost allocation has no bearing on a cost effectiveness analysis. The proper allocation of costs is irrelevant for purposes of determining whether a project's benefits outweigh its associated costs. Stated differently, the amount of benefit each customer class receives from ADMS does not change whether overall ADMS benefits outweigh total ADMS costs. Moreover, as explained below, residential customers will significantly benefit from shortened outages and from the "soft" benefits of the ADMS project.

The significant benefits Duquesne Light and its customers will experience from implementation of the ADMS make clear that the Company's proposed ADMS project is cost effective. OCA even admits that the ADMS project is cost effective when customer savings are taken into account. (OCA M.B., p. 15.) The Commission previously directed Duquesne Light to consider whether voltage monitoring and communication of outages and restorations capabilities would be cost effective and, if so, to implement them as part of the Company's SMP. *Smart Meter Procurement and Installation*, Docket No. M-2009-2092655, *Implementation Order*, entered June 24, 2009, pp. 16-17 ("*Implementation Order*"); *Petition of Duquesne Light Company for Approval of Its Final Smart Meter Procurement and Installation Plan*, Docket No.

M-2009-2123948 (Order entered May 6, 2013) (“*Duquesne Light 2013 Smart Meter Order*”). Duquesne Light has demonstrated that the ADMS is cost effective; therefore, it should be approved as part of the Company’s SMP.

**2. ADMS Cost Recovery Issues**

- a. OCA’s and Citizen Power’s assertion that ADMS costs should be recovered through base rates as opposed to the SMC is contrary to the Commission’s *Duquesne Light 2010 Smart Meter Order* and should be denied.**

OCA and Citizen Power propose that ADMS costs be recovered in base rates, rather than through the SMC. This issue has already been decided by prior order of the Commission, because ADMS is a smart meter cost and the Commission already has authorized Duquesne Light to recover smart meter costs through its SMC. *Petition of Duquesne Light Company for Approval of Smart Meter Technology Procurement and Installation Plan*, Docket No. M-2009-2123948 (Order entered May 11, 2010) (“*Duquesne Light 2010 Smart Meter Order*”).

Act 129 permits recovery of smart meter costs through a reconcilable automatic adjustment clause under Section 1307 or through base rates. 66 Pa. C.S. § 2807(f)(7). AMDS is necessary to meet the voltage monitoring and outage and restoration communication requirements of the *Implementation Order* and the *Duquesne Light 2013 Smart Meter Order*. Voltage monitoring and outage and restoration communication capabilities are defined as smart meter functionalities in these orders. *Implementation Order*, pp. 16, 30; *Duquesne Light 2013 Smart Meter Order*, p. 13. Therefore, ADMS costs are smart meter technology costs. The Commission has approved recovery of smart meter costs through a Section 1307 reconcilable automatic adjustment clause for Duquesne Light and all other Pennsylvania EDCs. See *Duquesne Light 2010 Smart Meter Order*, p. 14; *Petition of PECO Energy Company for Approval of Smart Meter Technology Procurement and Installation Plan*, Docket No. M-2009-

2123994, Order entered May 6, 2010, pp. 17-18; *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, Order entered June 9, 2010, pp. 37-28; *Petition of PPL Electric Utilities Corporation for Approval of Smart Meter Technology Procurement and Installation Plan*, Docket No. M-2209-2123945, Order entered June 24, 2010, pp. 10-11. In fact, the Commission expressly authorized Duquesne Light to recover its smart meter costs through its SMC, which is a Section 1307 reconcilable automatic adjustment clause, when it fully addressed the issue of smart meter cost recovery in the *Duquesne Light 2010 Smart Meter Order*, p. 14. Duquesne Light currently recovers its smart meter costs through the SMC in accordance with Act 129 the Commission's *Duquesne Light 2010 Smart Meter Order*.

OCA argues that ADMS costs are the type of capital and operating expenses that are traditionally recovered through base rates. (OCA M.B., p. 15.) OCA's argument fails to recognize that ADMS are smart meter costs and, unlike other capital and operating expenditures, Duquesne Light has been expressly permitted by statute and by the Commission to recover smart meter costs through a Section 1307 reconcilable automatic adjustment clause. *Duquesne Light 2010 Smart Meter Order*, p. 14. ADMS costs are no different than any other smart meter cost which Duquesne Light recovers through the SMC. OCA and Citizen Power have provided no basis for overturning the Commission's decision to allow Duquesne Light to recover smart meter costs through the SMC as is specifically authorized under Act 129. OCA's and Citizen Power's proposal to recover ADMS costs through base rates should be denied.

OCA attempts to use its argument that residential customers receive fewer benefits from ADMS argument to further support its proposal that ADMS costs be recovered in a base rate

proceeding. (OCA M.B., p. 18.) As explained previously, the Commission has already decided that ADMS costs, as smart meter costs, are properly recovered through the SMC. *Duquesne Light 2010 Smart Meter Order*, p. 14.

- b. OCA's and Citizen Power's proposal to allocate ADMS costs based on the benefits to each customer class is contrary to the Commission's *Duquesne Light 2010 Smart Meter Order* and should be denied.**

OCA and Citizen Power suggest that ADMS costs should not be allocated on a per meter basis, but should be allocated based on the benefits provided to each customer class. This issue has already been decided by the Commission in its *Duquesne Light 2010 Smart Meter Order*, where the Commission rejected OCA's proposal to allocate smart meter common costs based on benefits to each customer class and instead ordered that smart meter costs be allocated on a per meter basis.

OCA and Citizen Power argue that the residential class receives fewer benefits from ADMS than other classes. (OCA M.B., p. 18; Citizen Power M.B., p. 9.) In its Main Brief, OCA states that it does not raise this argument "for the purpose of reopening the question of overall cost allocation vis-à-vis smart meter costs in this proceeding." (OCA M.B., p. 18.) Despite implicitly acknowledging that the Commission has already decided this issue, OCA nevertheless suggests that the smart meter cost allocation "may need to be addressed to better match costs with benefits." (OCA M.B., p. 18.) To the extent OCA and Citizen Power argue that ADMS costs should be allocated on the basis of customer benefits, this proposal should be rejected.

OCA's and Citizen Power's assertion is contrary to the Commission's prior order which rejected the argument that smart meter costs should be allocated based on benefits to each class, and instead directed that smart meter costs should be allocated based on number of meters

*Duquesne Light 2010 Smart Meter Order*, pp. 11-12. As explained above, ADMS functionalities are smart meter technology. The parties have not distinguished ADMS costs from other smart meter costs, and the ADMS project costs should be allocated to customers on the same basis that the Commission has approved for other smart meter costs.

OCA and Citizen Power also fail to recognize the substantial “soft benefits” that residential customers will experience as a result of the ADMS project. While outages are shortened by an average of five minutes, the reduction in outage time could be much greater during a particular outage. Reductions in outage time will reduce the problems associated with being without electric service for residential customers. When outages are shortened during winter months, residential customers will experience reduced heating interruptions that force them to leave their homes. Shortened outage times will also reduce customer inconvenience of being unable to perform basic tasks like cooking that require electric service. Residential customers will also benefit from increased safety and the ability of customer service representatives to provide more detailed and timely outage information during calls. (*Duquesne Light St. No. 2*, pp 7-9).

OCA and Citizen Power have provided no basis for overturning the Commission’s prior decision to allocate smart meter costs on a per meter basis. OCA’s and Citizen Power’s proposal to allocate ADMS costs based on the benefits to each customer class is not practical and should be denied.

### **C. RECOVERY OF BILL READY COSTS**

OCA’s proposal to recover Bill Ready costs from EGSSs, as opposed to recovering such costs through the SMC, is contrary to the Commission’s *2012 Smart Meter Procurement and Installation Order* and should be denied.

Bill Ready is the billing process whereby an EDC provides an EGS with usage data, the EDC then receives the total EGS charges from the EGS and the EDC places the total EGS charges on a joint EDC/EGS bill to the customer. OCA recommends that Bill Ready costs should be recovered from EGSs rather than from Duquesne Light's customers through the SMC. (OCA M.B., p. 16.) The OCA's argument is flawed and should not be accepted. The OCA's argument fails to recognize that the Commission has specifically ordered EDCs to implement Bill Ready as part of their SMPs. *Smart Meter Procurement and Installation*, Docket No. M-2009-2092655 (Final Order entered December 6, 2012), p. 10 ("*Smart Meter Procurement and Installation Final Order*"). The Commission's *Smart Meter Procurement and Installation Final Order* makes clear that Bill Ready costs are directly related to an EDC's SMP and, as such, are recoverable as smart meter costs under the SMC. *Smart Meter Procurement and Installation Order*, p. 10. In fact, the Commission has directed EDCs to include Bill Ready as part of their SMPs because of the Commission's belief that Bill Ready capabilities facilitate Time-of-Use ("TOU") and Real Time Pricing. *Id.* The Bill Ready functionality will allow customers to receive more TOU options. As with all other smart meter costs, Bill Ready costs should be recovered from customers through the SMC as authorized by the Commission. *Duquesne Light 2010 Smart Meter Order*, p. 14.

In support of its proposal, OCA argues that EGSs are the "principal beneficiaries" of the functionalities provided by Bill Ready and that not all customers shop for their generation supply. (OCA M.B., p. 16.) OCA's argument misses the point that all customers are provided with the option and the capability to shop at any time. Therefore, Bill Ready benefits all customers regardless of whether they ultimately decide to receive service from an EGS.

Customers may choose to shop at certain times and to remain on default service at other times. Bill Ready allows the customers to always have the option to shop should they so choose.

OCA has cited no precedent for directing that Bill Ready costs should be charged to EGSs. The Commission has permitted EDCs to recover shopping-related costs from customers. The Commission has never required that these costs be segregated and recovered from EGSs or from only those customers who actually elect to exercise their option to shop.

Further, no mechanism exists for recovering these costs from EGSs, and OCA has not proposed any mechanism. (Duquesne Light St. No. 3-R, p. 5.) Attempting to recover Bill Ready costs from EGSs is problematic because EGSs freely enter and exit the market creating uncertainty for cost recovery. (Duquesne Light St. No. 3-R, p. 5.) Also, some EGSs may not want Bill Ready as part of their product offering and may not be willing to pay for it. (Duquesne Light St. No. 3-R, p. 5.)

EDCs recover smart meter costs from customers under Act 129, not from EGSs. OCA has failed to provide any support for its proposal that Bill Ready costs should be recovered from EGSs. OCA's proposal should be denied.

#### **D. INCREMENTAL AMI PROJECT COSTS**

OCA stated in its Main Brief that it supports the recovery of the additional \$54 million of Advanced Metering Infrastructure costs through the SMC, expect for \$7 million in Bill Ready costs. Duquesne Light has explained in Section C., above, why the \$7 million in Bill Ready costs should be recovered through the SMC.

#### **E. MISCELLANEOUS ISSUES**

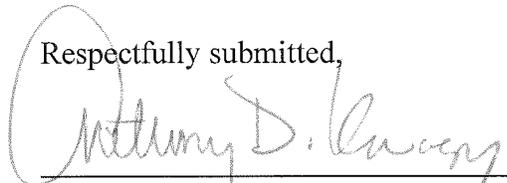
OCA lists the allocation of ADMS costs as a miscellaneous issue. Duquesne Light addressed this issue in Section B., above, related to ADMS issues.

## VII. CONCLUSION

For the foregoing reasons, Duquesne Light Company respectfully requests that Administrative Law Judge Katrina L. Dunderdale recommend that the Pennsylvania Public Utility Commission approve the Company's Smart Meter Plan without modification, including the Company's proposed ADMS project and the Company's proposal to recover ADMS and Bill Ready costs through the Company's Smart Meter Charge.

Tishekia E. Williams (ID # 208997)  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219  
Phone: (412) 393-1541  
Fax: (412) 393-5757  
E-mail: TWilliams@duqlight.com

Respectfully submitted,



Michael W. Gang (ID # 25670)  
Anthony D. Kanagy (ID #85522)  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: (717) 731-1970  
Fax: (717) 731-1985  
E-mail: mgang@postschell.com  
E-mail: akanagy@postschell.com

Dated: April 7, 2016

Counsel for Duquesne Light Company