OCA STATEMENT NO. 1S

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

SURREBUTTAL TESTIMONY

of

J. RICHARD HORNBY

On behalf of:

PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

November 16, 2009

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, EMPLOYER, AND PRESENT POSITION.

A. My name is James Richard Hornby. I am a Senior Consultant at Synapse Energy Economics, Inc., 22 Pearl Street, Cambridge, MA 02139.

Q. ARE YOU THE SAME J. RICHARD HORNBY WHO SUBMITTED PRE-FILED DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR SUR-REBUTTAL TESTIMONY?

A. Metropolitan Edison Company, Pennsylvania Electric Company, and Pennsylvania Power Company (collectively First Energy Companies) have proposed a budget of $29.5 million to cover the costs of their proposed activities during their two year Assessment Period and a new "Smart Meter Technologies (SMT-C) Rider to recover those costs from ratepayers. My surrebuttal testimony responds to certain of the statements made by rebuttal witnesses Parrish, Knecht and Baudino regarding the allocation of Assessment Period costs among rate classes. It also responds to the rebuttal testimony of Mr. Parrish regarding the design of the SMT-C rider, including a provision for crediting savings. Finally I respond to the rebuttal testimony of Ms. Morrissey regarding the ratemaking treatment of Assessment Period costs. (The fact that I do not respond to every statement in the rebuttal testimonies of these witnesses should not be interpreted to mean I agree with those statements.)

Cost Allocation

Q. PLEASE SUMMARIZE THE MAJOR CONCLUSION AND RECOMMENDATION IN YOUR DIRECT TESTIMONY REGARDING THE ALLOCATION OF ASSESSMENT PERIOD COSTS AMONG RATE CLASSES.

A. During the Assessment Period, the Companies are projecting to incur planning and design costs which are common or fundamental to the larger, ultimate costs of system-wide deployment of smart meters. The Companies are proposing to allocate these common Assessment Period costs among rate classes according to the number of customers in each rate class. My Direct Testimony concludes that this allocation is not reasonable because the primary factor causing the Companies to incur these costs is not the number of customers but instead is Act 129, whose goal is to reduce peak load and annual electricity use. Based upon that conclusion, I recommend that the Commission require the Companies to allocate their Assessment Period costs among rate classes according to a composite demand and energy allocation factor that reflects Act 129 and its goals as the source of cost causation

Q. PLEASE SUMMARIZE THE REBUTTAL TESTIMONY OF WITNESSES PARRISH, KNECHT AND BAUDINO REGARDING THE NATURE OF THE ASSESSMENT PERIOD COSTS

A. Neither Mr. Knecht nor Mr. Baudino dispute my categorization of the Assessment Period costs as common. Mr. Parrish says these costs are "akin to meter costs" but he does not explicitly deny that these are common costs (Parrish rebuttal, p.2). Moreover, the Companies' response to OSBA I-1 (c) clearly indicates that the Assessment Period costs are common costs that will benefit customers in all rate classes. (Exhibit___(JRH-2)

provides that data response as well as the Companies' response to several other data requests to which I refer in this surrebuttal).

Establishing the nature of these costs is a key first step in the selection of an allocation factor in this proceeding based on the guidance provided by the Commission in its Implementation Order. That guidance states "Any costs that can be clearly shown to benefit solely one specific class should be assigned wholly to that class. Those costs that provide benefit across multiple classes should be allocated among the appropriate classes using reasonable cost of service practices".

Neither Mr. Parrish, nor Mr. Knecht nor Mr. Baudino maintains that a portion, or all, of the Assessment Period costs should be assigned to a particular rate class. As a result, what is at issue is the choice of a factor for allocating these joint and common costs among rate classes "… using reasonable cost of service practices."

My Direct Testimony interprets the Commission's reference to reasonable cost of service practices to mean allocation of costs among rate classes according to cost causation. Mr. Parrish, Mr. Knecht and Mr. Baudino each have a similar interpretation. However, the choice of an allocation factor to reflect cost causation for joint and common costs is a matter of judgment on which analysts may, and often do, disagree. This is the situation in this proceeding. The opposition expressed by the three rebuttal witnesses to my proposed allocation of these joint and common costs is based upon a fundamental difference between their perspective regarding the factors causing these costs and my perspective on cost causation.

Q. ARE THERE EXAMPLES OF PARTIES IN OTHER JURISDICTIONS USING DIFFERENT ALLOCATION FACTORS FOR SMART METER COSTS?

A. Yes. In California, Pacific Gas and Electric effectively allocates all smart meter costs among electric rate classes using an energy allocation factor, since it recovers these costs via a Smart Meter Project Balancing Account via an energy rate applied uniformly to every kWh that it distributes[1]. In Maryland, Baltimore Gas and Electric is proposing to allocate all smart meter costs among electric rate classes using a demand allocation factor, i.e. a three year average of weather normalized peak load contribution by class measured as an average of five coincident peaks.[2]

Q. PLEASE RESPOND TO THE REBUTTAL TESTIMONY OF WITNESS PARRISH REGARDING THE ALLOCATION OF ASSESSMENT PERIOD COSTS AMONG RATE CLASSES.

A. In his rebuttal testimony Mr. Parrish states that the Companies have never allocated costs based on perceived or anticipated benefits (Parrish rebuttal, p.2). While his statement may be true, Mr. Parrish fails to acknowledge that we are not dealing with a traditional rate filing. Instead, the Companies are incurring these costs solely to comply with the smart meter plan requirements of Act 129 and the primary goals of that Act are to reduce annual energy use, peak load and the costs and environmental impacts associated with those two factors.

Act 129 is clearly "causing" the Companies to incur incremental costs to deploy smart meter technology. The Companies note that they are submitting a smart meter plan to comply with the Act in their petition on page 3, in their Plan on pages 1 and 3, in the

[1] Pacific Gas and Electric Tariff, Cal. P.U.C. Sheet No. 28089 - E.

[2] Maryland Docket 9208, Direct Testimony of David Vahos, July 13, 2009, page 26.

Direct Testimony of Mr. Paganie on page 7 at lines 7 and 8 and in the Direct Testimony of Mr. Mills on page 12 at lines 16 to 18.

Act 129 is also explicitly trying to achieve important public policy goals of reducing annual energy use, reducing the air emissions associated with that annual energy use, and reducing peak load. The General Assembly obviously expects that achieving these public policy goals will provide benefits to all customers in all rate classes. The joint and common costs associated with smart meter technology and energy efficiency are ultimately being caused by current levels of energy and demand, and the goal of Act 129 to reduce those current levels. For example, Mr. Paganie lists "…achieving Energy Efficiency and Demand Response" as the first benefits of the Companies' Plan (Paganie Direct, page 7 at line 23). Given the policy goals of Act 129, my recommendation for allocating Assessment Period costs based upon a composite energy and demand allocation factor is consistent with reasonable cost of service practices.

The position of Mr. Parrish and other rebuttal witnesses that smart meter technology costs incurred to comply with the Act are caused by the number of customers in each rate class is equivalent to a position that energy efficiency program costs incurred to comply with the Act are caused by the number of customers who participate in those programs. Neither of those positions is reasonable.

Q. PLEASE RESPOND TO THE STATEMENT BY MR. PARRISH THAT YOU DID NOT PROVIDE SPECIFIC ALLOCATION FACTORS.

A. The Companies could develop energy and demand allocation factors using their most recent 12 months of data on annual energy and peak demand by rate class. A reasonable allocation factor for Assessment Period costs would be a 50 / 50 weighting of energy and

demand allocation factors. I present composite factors for allocating the Assessment Period costs among the three Companies, and then for allocating each Company's portion among its three major rate classes, on page 1 of Exhibit___(JRH-3). These allocation factors are derived from the Companies' monthly energy and demand data for 2008, as shown on Exhibit___(JRH-3).

Q. PLEASE RESPOND TO THE REBUTTAL TESTIMONY OF WITNESS KNECHT REGARDING YOUR PROPOSED ALLOCATION OF ASSESSMENT PERIOD COSTS AMONG RATE CLASSES.

A. Mr. Knecht disagrees with my proposal to allocate these common costs using a composite energy and demand allocator because he interprets that approach to be based upon a "benefits standard" rather than a cost causation standard (Knecht rebuttal, p.4).

Mr. Knecht has misinterpreted my position. In fact, I am proposing allocation on the basis of cost causation. However, Mr. Knecht and I have a different perspective on the factors causing these costs. As discussed earlier, I consider the current levels of energy and demand at each of the Companies to be the factors causing or underlying the Act's requirement that the Companies incur smart meter plan costs. Mr. Knecht considers the current number of customers at each of the Companies as the cause of these costs.

In his rebuttal Mr. Knecht asserts that the future level of direct benefits will vary by customer (Knecht rebuttal, p.5). I agree. The future level of benefits each customer will receive will vary by rate class, and will also vary by customer within each rate class. However, that point is not relevant to my proposal, which is to allocate the assessment Period costs according to current levels of energy and demand by rate class.

Q. PLEASE RESPOND TO THE REBUTTAL TESTIMONY OF WITNESS KNECHT REGARDING OTHER POSSIBLE APPROACHES TO ALLOCATING ASSESSMENT PERIOD COSTS AMONG RATE CLASSES.

A. Mr. Knecht discusses two possible approaches for allocating these common costs (Knecht rebuttal, p.6).

The first possible approach is a customer allocator, which he states could either be "…weighted or unweighted". An unweighted customer allocator is one simply based on the number of customers in each rate class. A weighted customer allocator is one based on the number of customers in each rate class and the variation by rate class in the unit cost of the category of costs being allocated.

The table below illustrates the potential for dramatic differences between an unweighted customer allocator and a weighted customer allocator. This illustration assumes a utility with 1,000 residential customers, 100 commercial customers and 20 industrial customers. It also assume meters for commercial customers cost 10 times the cost of a meter for residential customers, and meters for industrial customers cost 30 times the cost of a residential meter. (The Companies did not provide a projection of the variation in the unit cost of smart meters by rate class in response to OSBA I-2).

Rate Class	Number of customers	Unweighted Allocation Factor (%)	Relative unit cost of a meter (weighting factor)	Number of customers	Weighted Allocation Factor (%)
Residential	1,000	89%	1	1,000	38 %
Commercial	100	9 %	10	1000	38%
Industrial	20	2 %	30	600	23 %
Total	1,120	100 %		2,600	100%

For this illustrative utility, an unweighted customer allocator would allocate 89% of meter costs to residential customers whereas a weighted customer allocator would allocate less than half that amount, i.e., 38 %.

Mr. Knecht states that the Companies' proposal to use an unweighted allocator is "…within the range of normal cost allocation practice for these costs". Mr. Knecht's support for the Company's proposal is inconsistent with his criticism, in the West Penn Power smart meter proceeding, of that Company's failure to reflect the difference in smart meter costs by customer class in its proposed allocation of those costs (Docket No. M-2009-21239512, Knecht Direct, page 5).

The second possible approach he discusses is an allocator proportional to the allocation of the direct costs of the Companies' SMIP (Knecht Direct, page 6). Mr. Knecht states that PPL Electric Utilities ('PPL') has proposed this approach in its smart meter proceeding. What Mr. Knecht fails to state is that PPL has proposed this approach to allocate the common costs of its proposed pilot programs, not to allocate its smart meter technology costs.

PPL has already deployed smart meters on its system and is currently proposing to conduct certain pilot programs to evaluate possible enhancements of its existing system. PPL is proposing to assign the costs of each pilot program to the customer class participating in that pilot program and to allocate the program management costs associated with its pilot programs among rate classes in proportion of the direct pilot program costs assigned to each class.

Q. PLEASE RESPOND TOTHE REBUTTAL TESTIMONY OF WITNESS BAUDINO REGARDING THE ALLOCATION OF ASSESSMENT PERIOD COSTS AMONG RATE CLASSES.

A. Mr. Baudino, like Mr. Parrish, fails to acknowledge that we are not dealing with a traditional rate filing, but instead that the Companies are incurring these costs solely to comply with the smart meter plan requirements of Act 129. Mr. Baudino also misunderstands my proposal. I am not proposing that these common costs be allocated on hypothetical future class benefits. Instead I am proposing that they be allocated based upon the Companies' current levels of energy and demand which I consider to be the factors causing or underlying the Act's requirement that the Companies incur these costs. Again, Mr. Baudino and I simply have a different perspective on the factors causing these costs.

Rate Design

Q. PLEASE SUMMARIZE THE MAJOR CONCLUSION AND RECOMMENDATION IN YOUR DIRECT TESTIMONY REGARDING THE DESIGN OF THE SMT-C RATE.

A. My Direct Testimony concludes that the Companies' proposal to recover Assessment Period costs from residential customers through a SMT-C applied as a customer charge is not reasonable. My position is based upon the fact that the Companies' did not provide support demonstrating that it would be reasonable to recover these common costs from residential customers via a customer charge. Therefore I recommend that the Assessment Period costs be recovered from residential customers as a delivery charge. To be clear,

my recommendation regarding the design of the SMT-C rate to recover Assessment Period costs was for the residential rate class SMT-C rider, since rate design varies by rate class.

Q. PLEASE RESPOND TO THE REBUTTAL TESTIMONY OF WITNESSES PARRISH, KNECHT AND BAUDINO REGARDING THE DESIGN OF THE SMT-C RATE.

A. In his rebuttal Mr. Parrish first states that the Companies will incur the Assessment Period costs regardless of the energy (kWh) or demand (kW) of each rate class. While that statement is true it has no relevance to the design of the rates to recover those costs. Next he states that the Companies have historically recovered meter costs via a customer charge. That statement may be overly broad as he provides no evidence to demonstrate whether the residential customer charge approved in its last general rate case was set to recover one hundred percent of the residential revenue requirements associated with residential meters and service lines. Nevertheless, that second statement is also not relevant since the Assessment Period costs are not meter costs that can be assigned to specific rate classes but instead are costs the Companies will incur to plan and design the deployment of smart meter technology, and as such are common costs.

In his rebuttal Mr. Knecht does not oppose my recommendation that the Commission reject the Companies proposal to recover Assessment Period costs via an SMT-C rider applied as a customer charge. Instead, he recommends that, if my proposed cost allocation approach is approved, the Commission require the Companies to recover the costs allocated to each rate class via separate energy and demand charges

corresponding to those allocated costs. I do not disagree with his proposed refinement for non-residential rate classes.

In his rebuttal Mr. Baudino does not oppose my recommendation that the Commission reject the Companies proposal to recover Assessment Period costs allocated to the residential rate class via a customer charge.

Tariff Design

Q. PLEASE SUMMARIZE THE MAJOR CONCLUSION AND RECOMMENDATION IN YOUR DIRECT TESTIMONY REGARDING TREATMENT OF OPERATIONAL SAVINGS IN THE CALCULATION OF THE SMT-C RATE.

A. The Companies' proposed tariff for the SMT-C makes no reference to crediting customers with savings in distribution service operating costs that result from its smart meter plan. My Direct Testimony concludes that the text of the SMT-C rider should include a provision for crediting such savings to ratepayers when the rate is calculated and recommends that the Commission require the Companies to modify its tariff to include such text.

Q. PLEASE RESPOND TO THE REBUTTAL BY COMPANIES' WITNESS PARRISH REGARDING TREATMENT OF OPERATIONAL SAVINGS IN THE CALCULATION OF THE SMT-C RATE.

A. As I anticipated in my Direct Testimony, Mr. Parrish begins by stating there will not be any such savings during the Assessment Period. He then indicates that the best mechanism through which to reflect any operational savings would be new base rates

established in future distribution rate proceedings. The approach that Mr. Parish is proposing is not consistent with either the Act or the Commission's Implementation Order.

The Act, in Section 2807 (f) (7), specifies the Company may recover reasonable and prudent smart meter technology costs net of operating and capital cost savings it realizes from that technology. That Section also gives electric distribution companies (EDCs) the option of recovering their net costs either through deferral and recovery in future base rates or a reconcilable automatic adjustment clause. The Companies have chosen the automatic adjustment clause option, i.e., the SMT-C rider. In its Implementation Order, the Commission states that EDCs such as the Companies who have chosen the adjustment clause option shall include a tariff for that rate mechanism that reflects "…operating and cost savings realized by the EDC from the installation and use of smart meter technology".

The Companies have chosen the automatic clause recovery option rather than the base rate recovery option. (Moreover, they have given no commitment to file a base rate case, per response to OCA I-34.) Having elected the automatic clause recovery option, the Act and the Commission's Implementation Order require that the Companies file a tariff that includes a description of the credit they will provide for operating and capital cost savings. If the Companies do not expect any such savings during the Assessment Period, they can propose a value of zero for that credit during the Assessment Period.

Accounting Treatment

Q. PLEASE RESPOND TO THE REBUTTAL TESTIMONY OF MS. MORRISSEY REGARDING THE TREATMENT OF ASSESSMENT PERIOD COSTS FOR RATEMAKING PURPOSES.

A. In her Direct Testimony Ms. Morrissey recommends that the Companies' SMT Plan administrative start-up costs and Assessment Period costs be capitalized and depreciated over the useful life of that Plan. In her Rebuttal Testimony she states that my Direct Testimony is not clear as to what portion of the Assessment Period costs should be capitalized. In order to be clear, my Direct Testimony did not address the treatment of Assessment Period costs as either expenses or capital expenditures. That is an accounting issue that is not within my area of expertise.

Q. **DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

A. Yes.

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EXHIBITS TO THE

SURREBUTTAL TESTIMONY

of

J. RICHARD HORNBY

On behalf of:

PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

November 16, 2009

METROPOLITAN EDISON COMPANY, PENNSYLVANIA ELECTRIC COMPANY, AND PENNSYLVANIA POWER COMPANY
DOCKET NO. M-2009-2123950

OFFICE OF SMALL BUSINESS ADVOCATE Set I, No. 1:

"Reference Met-Ed/Penelec/Penn Power Statement No. 3, page 7, lines 14-21:

a. Does the referenced testimony imply that the costs for all smart meters and supporting systems will be allocated to the three rate class groups based on number of customers?
b. If your answer to part (a) is in any way affirmative, please explain why the costs of meters are not directly assigned to the class for which they are installed.
c. If your answer to part (a) is in any way negative, please clarify the referenced testimony."

RESPONSE:

a. No.

b. Not applicable.

c. Regarding direct expenditures for the benefit of a specific rate class group incurred subsequent to the 24-month Assessment Period, those expenditures would be recovered from the specific rate class group. For example, the costs of residential smart meters would be recovered from the residential rate class group. Similarly, the costs of commercial smart meters would be recovered from the commercial rate class group and the costs of industrial smart meters would be recovered from the industrial rate class group. Common or indirect expenditures benefiting more than one rate class group, such as the backbone infrastructure (e.g., hardware and software), would be allocated among the rate class groups based on the number of metered customers. The allocation of costs incurred during the 24-month Assessment Period and start up costs incurred prior to the 24-month Assessment Period would also be allocated among the Companies and each customer class based on the number of metered customers.

METROPOLITAN EDISON COMPANY, PENNSYLVANIA ELECTRIC COMPANY, AND PENNSYLVANIA POWER COMPANY
DOCKET NO. M-2009-2123950

OFFICE OF SMALL BUSINESS ADVOCATE Set I, No. 2:

"Reference Met-Ed/Penelec/Penn Power Statement No. 3, page 7, lines 14-21:

a. Does First Energy expect the cost per smart meter to be the same for single phase and poly-phase service? Please explain your response.

b. Does First Energy expect the cost per smart meter to be the same for residential and large industrial customers? Please explain your response."

RESPONSE:

a. The identification of capital costs including the cost of single phase, poly-phase service, operating costs, and the assignment by rate class will not be determined until after the completion of the 24-month Assessment Period in which capital expenditures and operational and maintenance costs associated with technologies that could be installed to meet the requirements of Act 129 and the Commission's Implementation Order will be assessed.

b. See the Response to subpart a, *supra*.

METROPOLITAN EDISON COMPANY, PENNSYLVANIA ELECTRIC COMPANY, AND PENNSYLVANIA POWER COMPANY
DOCKET NO. M-2009-2123950

OFFICE OF CONSUMER ADVOCATE Set I, No. 34:

"Re: SMT Surcharges. Is the Company proposing to file a rate case in a specific future year in order to reflect the reductions in its O&M costs from the smart meter investment in its revenue requirements? If yes, what is the future year? If no, why not?"

RESPONSE:

The Companies have no current plans to file rate cases in a specific year to reflect any changes in O&M costs as part of revenue requirements that may result from smart meter investment.

Composite Energy and Demand Allocation Factors by Company and by Rate Class within each Company (2008 Data)

A. Composite Factor to Allocate Total Costs Among Companies

Company	Energy (1)	Demand (1)	Composite Energy and Demand (2)
Met-Ed	42.8%	40.2%	41.5%
Penelec	43.1%	46.0%	44.6%
Penn Power	14.1%	13.8%	13.9%
First Energy Companies	100.0%	100.0%	100.0%

B. Composite Factors to Allocate each Company's costs among its Rate Classes

Company	Rate Class	Energy (1)	Demand (1)	Composite Energy and Demand (2)
Met-Ed	**Residential**	39.4%	31.6%	35.5%
	Commercial	33.6%	39.9%	36.7%
	Industrial	27.0%	28.5%	27.8%
	Total	100.0%	100.0%	100.0%
Penelec	**Residential**	31.6%	45.5%	38.5%
	Commercial	36.0%	33.1%	34.6%
	Industrial	32.4%	21.3%	26.9%
	Total	100.0%	100.0%	100.0%
Penn Power	**Residential**	35.5%	43.5%	39.5%
	Commercial	29.9%	29.0%	29.5%
	Industrial	34.6%	27.4%	31.0%
	Total	100.0%	100.0%	100.0%

Notes

1 Exhibit___(JRH-3), page 2 of 2

2 Composite factor is 50% Energy factor and 50% Demand factor

Development of Energy and Demand Allocation Factors by Company and by Rate Class Within Each Company

A. Derivation of Energy Allocation Factor

Company	Rate Class	Annual Total of Energy Use (mWh) (1)	Percent by Company	Percent by Rate Class Within each Company
Met-Ed	**Residential**	5,602,348		39.4%
	Commercial	4,771,785		33.6%
	Industrial	3,844,614		27.0%
	Total	**14,218,747**	42.8%	100.0%
Penelec	**Residential**	4,527,613		31.6%
	Commercial	5,169,302		36.0%
	Industrial	4,646,252		32.4%
	Total	**14,343,167**	43.1%	100.0%
Penn Power	**Residential**	1,663,431		35.5%
	Commercial	1,402,231		29.9%
	Industrial	1,618,862		34.6%
	Total	**4,684,524**	14.1%	100.0%
First Energy Companies	**TOTAL**	**33,246,438**	100%	

B. Derivation of Demand Allocation Factor

Company	Rate Class	Demand per Month (mW) (2)				Average June to September	Percent by Company	Percent of Total
		June	July	August	September			
Met-Ed	**Residential**	796.6	752	653.1	758.8	740.1		31.6%
	Commercial	1,015.00	997.6	982.3	747.4	935.6		39.9%
	Industrial	629.6	654.9	712.2	674.3	667.8		28.5%
	Total					**2343.5**	40.2%	100.0%
Penelec	**Residential**	1,264.40	1,312.40	1,102.70	1,205.50	1221.3		45.5%
	Commercial	1,010.60	893.9	799.5	853.2	889.3		33.1%
	Industrial	648.3	568.1	531.1	543.4	572.7		21.3%
	Total					**2683.3**	46.0%	100.0%
Penn Power	**Residential**	391.9	380.6	337.5	288	349.5		43.5%
	Commercial	280.5	231.3	217.1	204.3	233.3		29.0%
	Industrial	230.9	179.9	195.3	275.8	220.5		27.4%
	Total					**803.3**	13.8%	100.0%
First Energy Companies	**TOTAL**					**5,830.0**	100%	

Sources

1	Response to OCA Interrogatory Set I, No. 2 Attachment A
2	Response to OCA Interrogatory Set I, No. 2 Attachment B