



**BEFORE THE CALIFORNIA PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

FILED

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Application of PACIFIC GAS AND
ELECTRIC COMPANY for Approval of
Modifications to its SmartMeter™ Program
and Increased Revenue Requirements to
Recover the Costs of the Modifications

(U-39-M)

Application No. 11-03-014

(Filed March 24, 2011)

**DECLARATION OF DAVID L. WILNER IN SUPPORT OF
EMERGENCY MOTION TO REQUIRE PG&E TO RETAIN ANALOG METERS**

Dated: October 3, 2011

David L. Wilner
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**DECLARATION OF DAVID L. WILNER IN SUPPORT OF
EMERGENCY MOTION TO REQUIRE PG&E TO RETAIN ANALOG METERS**

I, David L. Wilner, declare as follows:

1. I am familiar with the record in this proceeding, and am prepared to competently testify as to the matters set forth in this motion if requested to do so.

2. I have been informed by Hialeah Meter Company in Florida that it reconditions and calibrates electromechanical electrical meters (analog meters) to conform with ANSI standards.

3. This firm can supply 100,000 or more reconditioned analog meters at competitive rates over a reasonable period of time.

4. I have also been advised that this firm, and others that are qualified, can recondition analog meters taken out of service by electric utilities on an ongoing basis. As such, there would be an ample supply of analog meters in the future.

5. PG&E has advised me that it has approximately 552,600 analog meters in service, and no longer has the capability to recondition and recalibrate analog meters as it has done in the past.

6. PG&E has also advised me that a General Electric licensee located in Taiwan may be manufacturing analog meters as well.

7. PG&E has also stated that there is another domestic company (Vision Metering) in South Carolina that also refurbishes analog meters.

8. The information stated about PG&E's failure to provide an analog meter to Mr. Vyas, and the fact that the digital meter that PG&E installed instead did not solve his problem is accurate.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 3rd day of October, 2011, at Novato, California.

/s/

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