

FILE

1

LEBOEUF, LAMB, GREENE & MACRAE LLP

NEW YORK
WASHINGTON, D.C.
ALBANY
BOSTON
CHICAGO
HARTFORD
HOUSTON
JACKSONVILLE
LOS ANGELES
PITTSBURGH
SAN FRANCISCO

200 NORTH THIRD STREET, SUITE 300

P.O. Box 12105

HARRISBURG, PA 17108-2105

(717) 232-8199

FACSIMILE: (717) 232-8720

E-MAIL ADDRESS: SDEBROFF@LLGM.COM

WRITER'S DIRECT DIAL: 717-232-6453

LONDON
A MULTINATIONAL
PARTNERSHIP
PARIS
BRUSSELS
JOHANNESBURG
(PTY) LTD.
MOSCOW
RIYADH
AFFILIATED OFFICE
BISHKEK
ALMATY
BEIJING

March 23, 2006

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, OH 43215-3793

PUCO

2006 APR -3 PM 4:25

RECEIVED DOCKETING DIV

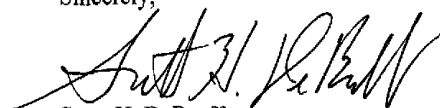
RE: **CASE NO. 05-1500-EL-COI - NOTICE OF APPEARANCE FOR
CELLNET TECHNOLOGY, INC IN THE MATTER OF THE COMMISSION'S
RESPONSE TO PROVISIONS OF THE FEDERAL ENERGY POLICY ACT OF
2005 REGARDING NET METERING, SMART METERING AND DEMAND
RESPONSE, COGENERATION AND POWER PRODUCTION PURCHASE AND
SALE REQUIREMENTS, AND INTERCONNECTION**

Attention Docketing Clerk:

Enclosed please find the original and fifteen (15) copies of the above-referenced
Notice of Appearance on behalf of Cellnet Technology, Inc.

There are two (2) additional copies enclosed for stamping to be returned in the
enclosed self addressed stamped envelope.

Sincerely,



Scott H. DeBroff

Attorney for Cellnet Technology, Inc.

SHD/bia
Enclosures

This is to certify that the images appearing are an
accurate and true reproduction of a case file
document delivered in the regular course of business
technician KW Date Processed 4-4-06

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

**IN THE MATTER OF THE COMMISSION'S
RESPONSE TO PROVISIONS OF THE
FEDERAL ENERGY POLICY ACT OF 2005
REGARDING NET METERING, SMART
METERING AND DEMAND RESPONSE,
COGENERATION AND POWER
PRODUCTION PURCHASE AND SALE
REQUIREMENTS, AND
INTERCONNECTION.**

CASE No. 05-1500-EL-COI

RECEIVED-DOCKETING DIV
2006 APR -3 PM 4:25
PUCO

ENTRY OF APPEARANCE

SCOTT H. DeBROff, Esquire
LeBoeuf, Lamb, Greene & MacRae, L.L.P.
200 North Third Street, Suite 300
P.O. Box 12105
Harrisburg, PA 17108-2105

TEL: (717) 232-6453
FAX: (717) 232-8720
eMail: SDeBROFF@LLGM.COM

DATED: MARCH 24, 2006

COUNSEL FOR CELLNET TECHNOLOGY, INC.

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

**IN THE MATTER OF THE COMMISSION'S
RESPONSE TO PROVISIONS OF THE
FEDERAL ENERGY POLICY ACT OF 2005
REGARDING NET METERING, SMART
METERING AND DEMAND RESPONSE,
COGENERATION AND POWER
PRODUCTION PURCHASE AND SALE
REQUIREMENTS, AND
INTERCONNECTION.**

CASE No. 05-1500-EL-COI

ENTRY OF APPEARANCE

AND NOW COMES **Scott H. DeBroff, Esquire** of LeBoeuf, Lamb, Greene & MacRae LLP, on behalf of his client, **Cellnet Technology, Inc.** ("Cellnet") and avers the following:

1. Cellnet is a party interested in the above-captioned docket as it is a meter technology provider which is interested in the efforts of the Public Utilities Commission of Ohio ("PUCO" or "Commission") to examine Advanced Metering capabilities and potential development into the State of Ohio. Cellnet has existing business relationships with several Ohio utilities and has a real and substantial interest in the above-captioned proceeding.

2. Cellnet Technology, Inc., with its headquarters in Atlanta, Georgia, supplies natural gas, water, and electric utilities with highly reliable, field-proven products that enable them to

communicate with residential and commercial and industrial (C&I) meters using wireless and IP network communications.

3. The above-captioned proceeding started via a Commission Order on December 14, 2005. As the Commission indicated, on August 8, 2005, President George W. Bush signed the Energy Policy Act of 2005 (EPAct 2005) into law. EPAct 2005 amends PURPA and requires state regulatory authorities, with respect to electric utilities, to consider and make a determination regarding the issues set forth below. Such issues and requirements include Sections 1251-Net metering, 1252-Smart metering, 1253-Cogeneration and small power production purchase and sale requirements, and 1254-Interconnection.

4. As the Commission indicated, in light of Sections 1251, 1252, 1253 and 1254 of EPAct 2005, the Commission has found that it's prudent to initiate a Commission-ordered investigation to review their actions with respect to net metering; smart metering and demand response; cogeneration and small power production, particularly the sale of stand-by power; and interconnection.

5. Consistent with Section 1252 of EPAct 2005, the Commission is interested in understanding the effect of "smart" or real time pricing metering on customers' demand response. They are also interested in understanding more about the different metering technologies that exist, their cost, any associated communication requirements, and proposed policies for the extent, the cost-effectiveness and the benefits to which such technologies might be deployed and seek comments on these matters.

6. Cellnet wishes to participate in this docket as a full party and asks that it be granted full party status and notice of all activities related to this proceeding. Further, Cellnet requests that it be placed on the Official Service List in this proceeding, and served with all pleadings, notices and orders.

7. Cellnet understands that Comments to the Commission's initial questions were due earlier this year and the Company is interested in participating in the process going forward and is satisfied to contributing comments in the remainder of the rulemaking.

8. Cellnet looks forward to sharing its thoughts and comments to the Commission and looks forward to actively participating in the series of technical conferences that the Commission will hold concerning Smart Metering and Demand Response. Cellnet will share its thoughts and perspectives regarding the progress of advanced meter reading (AMR) and advanced metering infrastructure (AMI) across the country as the Commission will allow.

9. All correspondence and pleadings in this docket should be directed to:

Scott H. DeBroff, Esquire
LeBoeuf, Lamb, Greene & MacRae, L.L.P.
200 North Third Street, Suite 300
P.O. Box 12105
Harrisburg, PA 17108-2105
Tel: (717) 232-6453
Fax: (717) 232-8720
eMail: sdebloff@llgm.com

10. Attorney DeBroff will represent Cellnet in this case, and on the basis of this notice, we request that copies of each document hereafter issued by this Commission in this matter be directed to the LeBoeuf address listed above.

Respectfully submitted,

Dated: **March 24, 2006**

By: Scott H. DeBroff
Scott H. DeBroff, Esquire
LeBoeuf, Lamb, Greene & MacRae, L.L.P.
200 North Third Street, Suite 300
P.O. Box 12105
Harrisburg, PA 17108-2105

Tel: (717) 232-8199

Fax: (717) 232-8720

eMail: sdebroff@llgm.com

Counsel for Cellnet Technology, Inc.

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

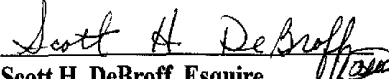
**IN THE MATTER OF THE COMMISSION'S
RESPONSE TO PROVISIONS OF THE
FEDERAL ENERGY POLICY ACT OF 2005
REGARDING NET METERING, SMART
METERING AND DEMAND RESPONSE,
COGENERATION AND POWER
PRODUCTION PURCHASE AND SALE
REQUIREMENTS, AND
INTERCONNECTION.**

CASE NO. 05-1500-EL-COI

CERTIFICATE OF SERVICE

I certify that I have by first class mail, this day served a true copy of the original attached **Entry of Appearance** on the Public Utilities Commission of Ohio, who in turn will, by electronic mail, serve all parties of record in this proceeding or their attorneys of record.

Dated: **March 24, 2006**

Respectfully submitted,
By: 
Scott H. DeBroff, Esquire
LeBoeuf, Lamb, Greene & MacRae, L.L.P.
200 North Third Street, Suite 300
P.O. Box 12105
Harrisburg, PA 17108-2105

Tel: (717) 232-6453
Fax: (717) 232-8720
eMail: sdebloff@llgm.com

Counsel for Cellnet Technology, Inc.