

Elster Integrated Solutions, LLC
STA Extension Request
Call Sign WD9XIV

EXHIBIT

Elster Integrated Solutions, LLC (“Elster”) seeks extension of special temporary authority (0275-EX-ST-2008) to continue small-scale testing of equipment developed under contract with Dominion Power, an electrical generation company. Elster requests an additional 6 months, until June 1, 2009, to continue residential testing in ten Virginia locations, as described below.

This request does not propose any change to the technical aspects of the testing program, testing locations, or the scope of the experimental program. This request decreases the overall number of transceivers in the experiment from 1500 to 1100 and changes the mix of transceivers. The original STA covered 500 transceivers for electric meters and 1000 transceivers for thermostats. The instant request includes only 1100 transceivers for electric meters. The remainder of the test program will employ thermostat transceiver units that are FCC-certified. This request seeks a 6-month extension for electrical meter transceivers to allow full roll-out and testing over additional seasons.

City	Latitude	Longitude	Approximate Radius
Arlington	38-52-49N	77-06-30W	16 km
Herndon	38-58-17N	77-23-19W	16 km
Falls Church	38-53-04N	77-10-34W	16 km
Richmond	37-31-58.8N	77-28-1.2W	16 km
Glen Allen	37-39-36N	77-29-08W	16 km
Reston	38-57-16N	77-20-47W	16 km
Alexandria	38-48-59N	77-04-17W	16 km
Ashland	37-45-34N	77-28-38W	16 km
Hanover	37-45-60N	77-23-13W	16 km
Midlothian	37-30-12.8N	77-39-4.6W	16 km

Justification for Extension Request

Roll-out of experimental units under the original STA faced delays, but the experiment is currently underway with active tester participation. Dominion Power and Elster have begun collecting valuable information about consumer actions, system management, and product improvements, but need further time to complete roll-out to fulfill the objective of the testing program.

The power utility and the public utilities commission seek an appropriately-sized sample to determine the effectiveness of the equipment and the energy conservation algorithms over a statistically significant population. The utility also needs to measure the impact of their power reduction actions (e.g., thermostat adjustments) upon power generation and distribution systems. Due to roll-out delays, Elster and the utility have not yet been able to complete the planned installation of experimental units so as to create

the sample size in the program design. Extension of the STA will allow completion of installations and the receipt of appropriate experimental data.

In addition to completing equipment roll-out to ensure statistically significant samples, Dominion Power has requested that the experimentation continue through multiple seasons so that the utility may obtain data about differing consumer patterns based on seasonal use. Without extension of the STA, Elster will be forced to prematurely end the experiment.

Experimental Units

As explained in the original application (0275-EX-ST-2008), the devices being tested provide a radio connection between the residential electric meter and the interior thermostat to reduce electrical consumption during times of peak demand and peak rates.

For each home in the trial, one transceiver unit is embedded in the metering equipment owned by the electrical carrier and remains outside the control of the residential user. The other end of the communication link is another transceiver unit embedded in the home's thermostat. Residential users participating in the test are customers who have specifically requested to participate in the test. Elster and Dominion Power do not charge residential participants a fee. Elster receives compensation from the utility company for training, installation, and data collection hardware and software.

The equipment has been designed to operate within transmitting power levels acceptable for Part 15 devices and on a frequency (2.405 – 2.480 GHz) on which the Commission authorizes Part 15 devices. The transmitting methodology is a standard-design [IEEE 802.15.4, similar to "ZigBee"]. Accordingly, no harmful radio interference should result from the tests proposed herein.

Experiment Purpose

As explained in the original application, the purpose of the test is to allow the power utility to assess the reactions of residential customers to the pricing and usage information supplied through the system and to determine whether the system provides information in a form that allows the customer to govern usage during peak hours to reduce the customer's electrical bill and to reduce the demand on the electrical system. The system also allows the utility to adjust energy usage in the home through making slight adjustments to the thermostat settings. The customer has the option to override these adjustments, and the utility's monitoring of this behavior is important to the study. Based on information from this test, Elster will proceed to revise the developmental equipment as necessary and seek Part 15 certification for the devices.

The residential testing envisioned in this STA Extension Request continues to differ significantly from that requested for testing in Louisiana with Entergy (0291-EX-ST-2008, "Baton Rouge STA Request"). Unlike the Baton Rouge STA Request, the

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Virginia STA Request includes a single pilot project. The Virginia STA Request also seeks consumer usage information from a different market segment than the Baton Rouge STA Request. First, Dominion Power seeks information from larger residential dwellings with higher energy consumption. Entergy, on the other hand, seeks information on residential dwellings that more closely approximate the average home size in its community. Second, the climates vary between Virginia and Louisiana (Louisiana is much hotter), and thus residential customers make different demands on the electricity grid. Third, Elster recognizes societal and cultural differences between Virginia and Louisiana that may impact the use and effectiveness of the experimental equipment and thus will provide stronger experimental data for analysis.

End-of-Test Retrieval and/or Relabeling

As stated in previous communications to the Commission, Elster maintains sole responsibility for end-of-testing removal or relabeling of experimental devices and will not delegate its responsibility to the utility or the home owner. Mr. Chris Kozlowski (or a successor employee should Mr. Kozlowski leave) will be responsible for this task.

To accomplish the installation, retrieval, and/or re-labeling of devices, a well-respected energy industry installation implementation contractor, GoodCents Solutions, has been and will continue to be utilized. For more than 28 years, GoodCents has managed utility-sponsored residential installation programs. For more information on GoodCents' excellent track record, please see www.GoodCents.com.

GoodCents was chosen for installation and end-of-testing revisits to residential locations as the most efficient, secure, and effective means to fulfill the experimental obligations. GoodCents has extensive experience with the residential installation of electric utility-related equipment, maintains employees familiar with residential installation, and has an established tracking program for identifying residential customer equipment that will ensure the proper removal and disposition of equipment at the conclusion of the experimental periods. As both the installation and end-of-testing contractor, GoodCents will have utmost familiarity with the project, product, and locations that makes it the most qualified contractor to retrieve or re-label the devices quickly, efficiently, and properly.

Elster has been maintaining a tracking program to maintain data on compliance status for the devices. Using GoodCents at both the installation and end-of-testing stages allows Elster to easily track where and how many devices have been installed, removed, and/or re-labeled based on unique serial numbers assigned to each device. Elster maintains data on the tracking numbers of each unit installed, the installation location(s) of the device(s), and the status of each unit's potential FCC certification.