From:	James Robert Deal
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Revised to correct grammatical errors.

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DEMAND THAT THE
UTILITIES AND TRANSPORTATION COMMISSION
BAN THE INSTALLATION AND REQUIRE THE REMOVE OF
SO-CALLED ADVANCED METERS
INCLUDING A REQUEST FOR DISCLOSURE OF PUBLIC DOCUMENTS

March 8, 2018
Revised March 12, 2018

Read online at:
www.jamesrobertdeal.org/demand-that-utilities-commission-ban-smart-meters

Washington Utilities and Transportation Commission
Sent by email to records@utc.wa.gov

In reference: to docket U-180117

Dear Commissioners:

I represent the Coalition Against So-Called Advanced Meters, formerly known as Hard Wired For Safety, a 501(c)(3) non-profit corporation. The Coalition opposes so-called advanced meters and points out their defects, the physical harms they cause, the damage they cause to property, their failure economically, their eavesdropping and surveillance capabilities, and their failure to qualify according existing regulations. So-called advanced meters and all electronic meters are a Consumer Protection Act case waiting to happen. The Washington State Utilities and Transportation Commission should halt advanced meter deployment immediately and restore analog meters. There is already sufficient evidence to support such a policy. The Commission could and should act on an emergency basis, with hearings to follow. At minimum the Commission should halt any further deployments of so-called advanced meters until hearings are held.

I will summarize the main points here and develop them below:

> We are being subjected to excessive and ever increasing levels of electromagnetic radiation from so-called smart meters, cell towers, portable phones, microwave ovens, security software, baby monitors, and Wi-Fi. The latest and worst of all is 5G. We must stop 5G deployment lest we all be fried.
>
> Electronic meters are not grounded whereas the analog meters they replace are grounded.

Electronic meters are not well protected against surges. Analog meters include a superior built in surge protector.

Electronic meters are much more likely to catch fire than the all-metal analog meters they replace.

Electronic meters utilize a cheap, switched mode power supply, SMPS, to regulate voltage, which produces harmful stray current.

So-called advanced meters, those with have the communicating and surveillance function enabled, violate privacy in two ways, by collecting private information and by making it easy for hackers to hack into our homes.

Electronic meters cost more than analog meters. They wear out in seven years, whereas analog meters last 40 years.

All electronic meters consume a significant amount of electricity just to operate. They are always on. They are computers and have circuit boards. They build up heat.

Analog meters consume only an exceedingly tiny amount of electricity to rotate their aluminum wheels as they measure watts consumed. They consume no electricity to operate if no electricity is being consumed in the building. They are sometimes off. They do not build up heat.

Advanced meters in which communicating functions are enabled consume even more electricity as they send, receive, and relay electromagnetic information thousands of times daily. They are always on.

So-called advanced meters increase total electricity consumption. You cannot be green and support so-called advanced meters.

So-called advanced meters will increase what users pay for electricity.

The savings to be had from putting meter readers out of work will be exceeded by the cost of the meters, the increased consumption of electricity, and the damage to our appliances and equipment. So-called advanced meters will not reduce costs for utility companies, will not increase profits for private utility companies, and will not increase

surpluses for publicly owned utilities. Advanced meters are an economic goof-up on both a short term and long term basis.

Electronic and so-called smart meters exceed the scope of the electric meter utility easements previously granted to utility companies, and therefore constitute a trespass.

Regulations and policies which allow some customers to opt out of having electronic meters but arbitrarily deny that right to other consumers, discriminate in ways which are unconstitutional.

Electronic meters are poorly designed and engineered. They are in every way inferior to the analog meters they are replacing. Technologically they are a complete failure.

Utility companies are going the wrong way down a dead end street, wasting enormous amounts of money to install much inferior meters. The money being wasted should instead be spent to install fiber optic.

So-called advanced meters create a new security hole into homes, and businesses. It is possible to collect billing information without doing it through an advanced meter. Utility companies could make available for free a software program that would allow consumers to measure their usage in real time and report it automatically to utility companies.

So-called smart meters are one of many profitable frauds being perpetrated on the public. They can be perpetrated because our agencies have been taken captive, through campaign donations and the revolving door, by the industries they regulate. I have proposed a way to take the money out of politics and eliminate the revolving door. See www.jamesrobertdeal.org/election-and-campaign-finance-reform.

So-called advanced meters emit – on a constant basis – large amounts of electromagnetic radiation of the type which is carcinogenic in large doses over short periods of time and carcinogenic in smaller doses over long periods of time.

Insurance companies currently cover damage from electrical surges, but actuaries may get wise and change that.

Insurance companies will not cover harm from electromagnetic radiation. Actuaries have decided that this is an unreasonable and potentially enormous risk for them to take. It is likewise an unreasonable and

potentially enormous risk for public and private utilities to take. They will be going bare with regard to the harm from electromagnetic radiation.

All of us are will be harmed by excess electromagnetic radiation in the long term, although most of us are able to ignore it for the present. Some people really are electro-sensitive in the short term. The installation of smart meters and the excessive broadcasting of microwave radiation is a callous denial of their condition. They are the canaries in the coal mine, and we should pay attention to their reactions and not dismiss them as malingerers.

The issue is not just smart meters or cell phones or Wi-Fis, or cell towers, or microwave ovens, or portable phones, or baby monitors, or security monitoring systems, or the increasing number of smart appliances in our homes, schools, and workplaces, or 5G (which absolutely should be stopped less we be fried). Instead, the issue is the total amount of electromagnetic radiation to which we are being subjected. No entity is keeping track of total exposure.

The Washington Utilities and Transportation Commission is the proper agency look at the big picture and calculate the total amount of radiation. The Commission is also the proper agency to reverse the rollout of both so-called advanced meters and 5G antennas.

The Commission should demand that manufacturers of cell phones, tablets, and other through the air connecting devices also be capable of being plugged into ethernet cables when at home, school, or work so that electromagnetic radiation from these devices can be reduced and eliminated.

I will expand on these points below.

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Electromagnetic radiation is invisible, and so it is easy to assume that it does us no harm. However, before jumping to this conclusion there are numerous questions that public officials must answer.

I will therefore be sending the Commission a separate document containing requests for public disclosure, all of them pertaining to so-called advanced meters and to electronic meters in general. In these Requests are the many

questions which the Commission and the utility companies have failed to ask and answer.

Before presenting my Requests, I will first give you necessary background information regarding these meters and point out their many flaws.

For general background, I invite you to watch the video at https://www.youtube.com/watch?v=gRR_u3oooHw.

To make it easier to follow this and other links, visit www.jamesrobertdeal.org/Demand-That-The-Utilities-Commission-Ban-Smart-Meters.

To read several other documents pertaining to these issues, please visit www.JamesRobertDeal.org/Smart-Meters.

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Advanced meters are sometimes referred to as AMI meters, which is short for Advanced Metering Infrastructure. AMI includes not only the meters but also the wireless mesh network, which relays information from one broadcasting and receiving meter to the next, and on down the line, bathing the entire area in electromagnetic radiation. These advanced meters are also frequently referred to as "smart meters". The advanced meters or smart meters I refer to herein include the meters that the city of Seattle is installing throughout its service area.

I will also discuss electronic meters in general, a term which includes the non-communicating opt out versions of the advanced meters and also the many non-communicating GE digital meters that have been installed since around 2000. Although these GE meters are not of the broadcasting version, they are only slightly less defective as the so-called advanced meters.

I will refer to the so-called advanced meters and the GE digital meters together as "electronic meters", in contrast to the all-metal, fireproof, well grounded, surge protected, electromechanical analog meters.

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So-called advanced meters and AMI mesh networks are the product of the Great Recession of 2008. The Obama Administration was looking for "shovel ready" projects on which to spend government money. The aim was to spend a lot of money in order to stimulate the economy. Said advanced meters were

claimed to be shovel ready, which was and remains completely untrue. The Obama administration and the Department of Energy were chumps. They were swindled into funding the installation of these inferior meters, paying utility companies part of the cost of their installation.

Many wonder why our Department of Energy would finance installation of such devices. The explanation is that all our agencies, both on the federal and on the state level, have been captured to varying degrees by the industries they regulate. The wireless and electronic meter industry donate to elected officials. In return elected officials appoint pro-industry hacks to head our agencies. These hacks get big bonuses before they leave their corporate jobs. After a term at relatively low pay working for federal and state agencies, they return to their corporate jobs and again get big bonuses. The revolving door should be banned. Lobbyists should be banned from connecting elected officials with money. Elected officials should not be allowed to accept contributions from industries which lobby them. Campaigns should be financed publicly. Arguments that public financing would be too expensive fail to understand that the current arrangement is many times more expensive. See www.jamesrobertdeal.org/election-and-campaign-finance-reform.

The Department of Energy should have known that that AMI was an inferior, defective, and harmful technology. Maybe the Department did know. Maybe elected officials were taking large campaign donations from wireless and advanced meter lobbyists and were paid to look the other way. Maybe the Department of Energy was being administered by former employees of through the air industries, who obtained their positions through the revolving door. Likewise, Obama was not a green politician. He was progressive only on social issues.

So-called smart meters were sold to the Obama administration and the Department of Energy via misrepresentation. They were sold with the representation that they are superior when they are inferior.

So-called smart meters were sold with the misrepresentation that they would make possible the minute by minute monitoring by consumers of their electrical consumption. However, the mesh network is unable to transmit usage data quickly enough for users to monitor their usage in real time. Only a wired connection could accomplish that. Instead, advanced meter feedback regarding usage is only made available on a next-day basis, and that is useless for giving feedback to customers as to how much electricity they are using at any given time.

So-called smart meters were sold to the Obama administration, the Department of Energy, and Seattle City Light with the representation that they would make the "smart grid" more effective by helping to balance loads over large areas. This was as misrepresentation. The minute by minute data that utility companies with advanced meters are collecting are delivered too slowly to provide useful data for load balancing. Modern automated load sensing equipment at the substation level are sufficient for that purpose.

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There are two major industry factions when it comes to connecting our devices to the internet. They both cooperate and compete with each other. On the one hand are hard wired connections, such as twisted pair DSL, coaxial cable, and fiber optic. On the other hand, are the non-wired, through the air connections such as cell towers, cell phones satellite dish, advanced meters, and Wi-Fis. While Wi-Fi is usually connected to a hard-wired source, it broadcasts through the air in home, schools, and businesses.

Current 4G technology at frequencies of 900 megahertz to 1.9 gigahertz to 2.4 gigahertz is not fast enough for television, gaming, or the delivery of large amounts of data. Hence the industries that want to connect through the air are developing 5G technology at 6 gigahertz up to 26 gigahertz and even up to 90 gigahertz, which is clearly hazardous to health. The new 5G cell antennas, with several on each block, will be powerful enough that wired connections will be unnecessary.

Utility companies are wasting hundreds of millions of dollars deploying advanced meters and mesh networks. This money would be better spent building fiber optic connections. Through the air connections should be minimized because of the harmful nature of microwave radiation.

We should be able to connect all of our devices on a hard-wired basis, at home, at work, at school, and even in internet cafes. We should be able to turn off our Wi-Fis and connect as much as possible by plugging in.

It should be possible to plug our cell phones into hard wired ethernet cable when we are at home, at work, or at school, or even at an internet café. We should then be able to switch our phones to airplane mode and converse, surf, watch movies, and game on them while they are hard wired. The fact that it is tricky or impossible to do this with a cell phone shows just how uncreative cell phone manufacturers are.

We should develop safer frequencies and lower intensities for connecting when a hard-wired connection is not available.

Electromagnetic radiation from cell phones is multiplied many times when cell phones are used inside cars. Vehicles should have exterior antennas to receive and transmit, and those inside vehicles should be able to plug into a connection to those exterior antennas and set their phones on airplane mode, thus reducing exposure to electromagnetic radiation.

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The electromagnetic spectrum is important and should be made use of. We are not Luddites. We are not opposed to better technology just to protect the jobs of meter readers. We are opposed to the reckless and rapidly increasing overuse of electromagnetic radiation at harmful frequencies, at harmful intensity levels, and in far too many places.

We are opposed because electromagnetic radiation from so-called advanced meters straddles the radio and microwave bands, and is harmful to health. The International Agency for Research on Cancer, a branch of the World Health Organization ruled in 2014 that the radiofrequency radiation produced by cell phones, which operate at the same frequency as so-called advanced meters, is a type 2B possible human carcinogen. The IARC finding, as summarized by Scientific American is that:

> … as the thousands of rats in the new study were exposed to greater intensities of RF radiation, more of them developed rare forms of brain and heart cancer that could not be easily explained away, exhibiting a direct dose–response relationship. Overall, the incidence of these rare tumors was still relatively low, which would be expected with rare tumors in general, but the incidence grew with greater levels of exposure to the radiation.

A Type 1A carcinogen is a confirmed human carcinogen, such as arsenic. A Type 1B carcinogen is a probable human carcinogen. A Type 2A carcinogen is a confirmed carcinogen in animals and therefore a probable human carcinogen. A Type 2B carcinogen is a probable carcinogen in animals and therefore a possible carcinogen in humans. These four categories are defined differently by different authorities.

The WHO is a very conservative, pro-business organization. For the WHO to make this admission regarding the harmful nature of electromagnetic radiation should then be considered believable and even an understatement of the

problem. There was one member of the IARC who wanted to classify cell phone radiation as a probable human carcinogen instead of just a possible human carcinogen, however, he was bumped from the decision making panel.

Further, the National Institutes of Health National Toxicology Program issued findings in 2016, as summarized by the Environmental Health Trust:

> The study found adverse effects after long term exposure to cell phone radiation:
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> - Increased incidences of glioma (a rare, aggressive and highly malignant brain cancer) as well as schwannoma (a rare tumor of the nerve sheath) of the heart were found in both sexes of rats, but reached statistical significance only in males.
> - Increased incidences of rare, proliferative changes in glial cells of the brain and in Schwann cells (nerve sheath) in the heart of both sexes of rats, while not a single unexposed control animal developed these precancerous changes.
> - DNA damage was induced with both modulations of radiofrequency radiation (RFR) in both rats and mice (mixed results in tissues and brain regions).
> - Results from this study clearly show that biological impacts occur at non-thermal exposures like those that take place from cell phones today.

Such conclusions regarding radiation in cell phone bands applies equally to so-called advanced meters because the meters and cell phones operate at the same frequencies.

The NIH points out that the connection is dose related, meaning that there is clear correlation between cancer incidence and level of exposure. The harms caused by electromagnetic radiation are cumulative over time. Researchers refer to the harms from electromagnetic radiation as being “dose-response dependent” or “exposure dependent”. As the dose goes up, the harm goes up in a linear manner. As our total lifetime dose of electromagnetic radiation increases, the incidence of cancer increases at a parallel rate.

It is hard to prove cancer causation in humans because you cannot put them in cages and expose them to microwave radiation for X hour per day for X days. However, the case has now become conclusive. Electromagnetic radiation in the cell phone bands and up should be reclassified from possible human carcinogens to probable and even confirmed carcinogens in humans. It is another indication that agencies have been subverted by the industries they

regulate that we tend to give the benefit of the doubt to big cash flow businesses instead of to human health concerns.

The carcinogenic effect is not immediate. Not all people will contract cancer from this radiation. But many will. The effect is cumulative over time. We could dramatically reduce exposure to electromagnetic radiation and therefore dramatically reduce the harm.

The latest example is John McCain who developed glioblastoma where he had long held his cell phone on the left side of his face.

Further, radiation in the cell phone bands causes damage to mitochondria. Dr. Joseph Mercola says:

> The primary pathology behind cellphone damage is not related specifically to brain tumors, or even to cancer. Instead, the real danger lies in damage from the reactive nitrogen species peroxynitrites. Increased peroxynitrites from cellphone exposure will damage your mitochondria, and your brain is the most mitochondrial-dense organ in your body.

On top of all that is the very clearly validated fact that microwave radiation damages eyes. See Effects of microwave radiation on the eye: the occupational health perspective, which says:

> Microwaves act on living tissue through two types of mechanisms, thermal and nonthermal. Lens opacities can be induced in experimental animals at relatively high intensities (power densities greater than 100 mW/cm2). For lower intensities, lens changes may depend on the cumulative dose. At "nonthermal intensities", microwaves can act as a trigger and set off changes in the living tissues (e.g. Ca++ efflux). Some cataract-causing agents (alloxan and galactose) act synergistically with microwaves. Microwaves also accelerate formation of cataracts due to diabetes. The corneal endothelium can be damaged by microwaves alone or in combination with some drugs. Microwave degeneration of retinal nerve endings and a small increase in retinal permeability were also found in animals. The effect of long-term low-intensity microwave exposure on the human lens remains poorly understood. Several reports have implicated occupational microwave exposure as a factor in increasing the rate of lens aging and retinal injury in microwave workers. In Canada, recommended microwave exposure limits are set at 25 mW/cm2 for microwave workers and at 1 mW/cm2 for the general public (both averaged over 1

> minute). The Australian microwave exposure safety standard (1985) recommends pre-and post-employment eye examinations for workers.

That's a pretty clear indication that the current levels of microwave radiation in the cell phone bands cause damage to eyes and premature cataracts. I know this to be so by personal experience. I am extremely near sided, at around 20/400 and eight diopters. I like to read with my glasses off and with book or newspaper or cell phone around six inches away. In bed I would read usually with my left eye only. I would sometimes read hours each day with my cell phone six inches from my eyes. And now I am ready for cataract surgery, first in the left eye which is damaged the most. There was no warning from the cell phone vendors that my cell phone could ruin my eyes. I have a Consumer Protection Act case against certain cell phone companies.

There should now be no doubt that microwave radiation in the cell phone bands is harmful to health. To ignore this now proven link is negligent and even reckless.

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Around 3.0% of the population is electro-sensitive. Electromagnetic radiation is gradually harming us all, but most of us do not perceive the harm. The electro-sensitives do. Why are they sensitive? They may have been heavily overdosed in the past by radiation or perhaps chemicals and thus may have learned to identify the insult. When they are exposed again, they react.

If utility companies are going to install electronic meters, including so-called advanced meters, they should install protection for those who are electro-sensitive. Utility companies in Europe are installing microwave repelling paint, Faraday microwave insulation, and dirty energy filters for those who are electro-sensitive. Actually, utility companies should provide such protection to all customers – unless they quit irradiating us by terminating the smart meter program entirely.

Supporters of wireless technology ridicule those who question it as tin foil hat conspiracy theorists. If advanced meters and 5G are implemented, we can expect many people to wear clothing and headgear which will repel microwave radiation. These people will not be crazy tin foil hat conspiracy theorists.

There are some conspiracy theories which are crackpot. There are other conspiracy theories which are valid, and the over-radiation of us all is a valid conspiracy theory.

Again, the savings achieved by putting meter readers out of work is counterbalanced by other costs, and the cost of protection those harmed by the radiation is another big cost.

I would speculate that the potential liability of companies which have built and sold a lot of so-called advanced meters and AMI mesh networks is so large that they are effectively bankrupt.

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The wireless spectrum should be used more sparingly, at safer wavelengths, at safer frequencies, and at safer energy intensities. Unsafe bands and intensities should not be used at all. The spectrum should not be filled up unnecessarily or over-used.

When wired connections are available, wired connections should always be used instead of wireless connections. When hard wired connections can be installed for a reasonable price, they should be installed. The radio spectrum should not be junked up with a cacophony of radiation from so-called advanced meters, their wireless mesh network, and the latest and worst offender 5G.

If meters are to be made smart, they should be made smart by way of a hard wired connection, not through the air.

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Smart meters are not necessary. They represent huge sums of money spent on infrastructure that provides no benefits or savings to the customer and which provides no net savings or increase in profits or surplus to utility companies.

Seattle City Light, for example, raised $100 million through a bond initiative and is wasting it to build a defective, uneconomic, and unhealthy advanced meter program. Instead utility companies should use the same money to extend fiber optic connections throughout their service area, as Mount Vernon has done, with a gigabyte up and a gigabyte down for $70 per month. Hight tech, heavy internet dependent companies are relocating to Mount Vernon for this reason. Once fast, hard wired internet connections are available, cell phone and tablet users should then be able to plug into them and perform all cell phone functions in airplane mode, without subjecting themselves to any radiation.

Seattle, for example, should ditch its current flawed meter program. If it wants electronic reporting of usage, it should invite manufacturers to design a digital, grounded, surge protected analog meter than would also report total usage only and do so once each month.

A much more economical solution would be to provide customers with free software which they could use to monitor their own real time usage. In turn, customers could automatically report usage to the utility companies. Advanced meters would be completely unnecessary.

We are already flooded with radiation in the cell phone bands, whether from cell towers, cell phones, Wi-Fis, Bluetooth, microwave ovens, baby monitors, security devices, or portable phones. More radio and microwave radiation will come from the many new smart appliances being introduced as part of the foolish and reckless Internet of Things movement.

There are plans to implement 5G soon. Instead of 4G electromagnetic radiation in the relatively high 800 megahertz to 1.9 to 2.4 gigahertz range, 5G will use microwave radiation in the 6 to 27 gigahertz range and up to 90 gigahertz, with very short millimeter wavelengths and high energy levels. The plan is to erect small cell broadcasters – the size of refrigerators – on telephone poles and light poles throughout our cities.

People do not really need to be able to watch movies and do gaming on portable devices operating through Wi-Fi or direct from a cell tower. They can go home and log into their hard wired computer. They should be able to go home and plug their cell phones into an ethernet connection and watch movies that way. It should be easy for cell companies to create an adapter or connector which would make this possible, but none has been creative enough to do so. The latest iPhone comes with no plugin connection at all. It does absolutely everything wirelessly. Apple has really gone the wrong way down a dead end street.

Even now internet service providers such as Frontier are installing 5G Wi-Fi as a built-in part of new routers. These Wi-Fis are turned on by default, with customers not even being notified that they are turned on, with no notice that customers can disable them, and with no notice that they can continue to use their existing 4G Wi-Fis. It is our position that states, cities, and utility commissions should prohibit deployment of 5G. As I say often, and as I can't say often enough, 5G must be stopped or it will fry us all.

All of these radiation emitters are and will be chirping away at each other more and more, filling our streets, homes, schools, and work places with an ever-

increasing jumble of many wavelengths, frequencies, and intensities 24 hours each day. The extent of harm from so many sources of microwave radiation has not been totaled up. The wireless industry does not want to know what the total is, and because the wireless industry controls our regulatory agencies, our agencies do not want to know.

Our headlong rush into wireless everything would be judged by a court of law to constitute both negligence and recklessness.

The burden of proof regarding the safety of electromagnetic radiation should be on those who are shortening wavelengths, increasing frequencies, and increasing energy intensities, and not on those who are subject to being irradiated by them.

Most single-family homes, most apartments, and most places of business already have some hard wire connection available, such as twisted pair DSL telephone, coaxial cable, and even fiber optic. Those connections should be used whenever possible, instead of wireless connections. Wireless connections should be used only as needed and at wavelengths, frequencies, and intensities that minimize harm, especially in relation to those who are electro-sensitive.

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Analog electromechanical meters provide a path to ground. Circuit breakers, power strips, and three-pronged plugged appliances all need a path to ground to do their job of providing protection. Analog meters provide that path to ground, whereas electronic meters do not.

Electronic meters fit into the same wall socket as analog meters, but they do not connect to the available path to ground. A meter that is not grounded is more prone allow voltage surges to enter the building and damage wiring and electrical equipment.

Analog meters contain a spark-gap surge protector which will divert most surges to ground and prevent them from entering the building. Spark-gap protection is far better than the puny surge protection provided by electronic meters.

It should be clarified that spark gap protection will not protect against a direct lightning strike. Such protection could cost many thousands of dollars.

However, analog meters will protect against less than direct strikes, for example when lightning strikes the ground hundreds of feet away and travels

through the ground to the building. The spark gap surge protector in an analog meter will in many cases divert such indirect, ground travelling lightning strikes to ground, while electronic meters will catch fire, set fire to the building, allow 2,000 amp surges into the building, and fry electronics and wiring.

Lightning strikes are fairly rare in the Northwest. The most common cause of surges here is when there is a storm, when trees fall, and when wires get crossed. A spark gap surge protector will protect against voltage spikes from crossed wires, while the insufficient surge protector in an electronic meter will not.

Some believe that circuit breakers in their panel will protect the building against strong surges from outside the building. This is not true. Circuit breakers in the panel only flip and provide protection when devices within the building are drawing too much current. They do not flip in response to surges coming from outside the building.

Electronic meters contain a varistor, which is also known as a metal oxide varistor or VOM. Varistors were added to electronic meters to remedy the fact that they lack a path to ground, and to cut down on the fires which electronic meters were causing.

The varistor is an absorption surge protector. It does not pass current to ground. It provides protection only up to 300 volts AC. Many smaller surges will occur, and the varistor will absorb them. However, small surges have a cumulative effect on the varistor. Small surges happen frequently due to substation switching and other utility operations. The point will come when a relatively small surge exhausts the varistor's capacity. It will burn out. The meter will then catch on fire. Current will surge into the building and damage wiring and equipment.

Manufacturers of the varistors typically used in digital meters advise that they can survive only a certain number of small surges before they break down. A customer would never know when the varistor in his or her electronic meter will break down and catch fire.

As pointed out above, the most common form of surges in the Northwest is not from lightning strikes but from line surges caused by crossed wires. Line surges are common. They occur when a pole or tree branch falls on two lines and the two lines come into contact. When lines cross, they can send more than the rated voltage to the transformer up on a neighborhood pole that feeds current out to individual buildings.

The line voltage at the poles can be from 7,200 to 36,000 volts, depending on the substation and the utility. The most common is 7,200 volts. The transformer on the pole is a simple conversion device. There may be a ratio of 50 turns on the high voltage side to one turn on the stepped down side. If wires are crossed, the input is doubled, and this in turn doubles the output. So, stepped down voltage will double from a normal 240 volts to 480 volts in an instant.

When the varistor in an electronic meter, which is rated for 300 volts, meets 480 volts, it cannot handle it. The substrate separates from the circuit board and explodes. A bridge of 480 volts or more crosses the remaining circuit board. The circuit boards are only rated for 12 volts DC, so the circuit board melts and catches fire. The surge passes into the home and into all electrical equipment.

Apparently, insurance companies are still paying for damage from surges, However, because this is a clear design defect, it is likely that insurance companies will either exclude all coverage from surges or make surge coverage a protection for which customers will have to pay extra, as in the case of flood and earthquake coverage.

A circuit board does not belong inside an electric meter. It is too fragile.

Surges also occur when power has gone down and comes back up. There is a system-wide draw by many motors starting up all at once. This drops system voltage. The system sometimes over-reacts and increases voltage too much, creating a system wide surge. Again, varistors in electronic meters burn out. The meters explode and catch fire.

Because electronic meters are not grounded and because their varistor surge protector is good only to 300 volts, and because they contain plastic and circuit boards, they will catch fire and in turn catch a building on fire. Google for “smart meter fires”.

When a digital meter blows, there is a loud bang and popping noises, followed by flickering lights and then a fire. A massive amount of current can enter the building up to 2,000 amps. Goodbye appliances, equipment, and wiring.

On the other hand, an analog meter is all metal. It has a rugged, fireproof Bakelite back plate. It does not catch fire.

Electronic meters are computers masquerading as meters. They sit in the same socket as an analog meter, but they lack several of the most important features of analog meters.

The National Electrical Code requires a properly sized circuit breaker in front of all electronic devices. Analog meters have a robust spark gap surge protector and comply with NEC Code 240.4. However, digital meters do not comply, and their manufacturers have never applied for nor received a waiver. This is one of many examples of laws which are unenforced if big cash flows will be interrupted.

So-called advanced meters are therefore illegal. When a law is being broken, negligence is per se. That means that plaintiffs will not have to prove negligence. They will only have to prove they have been harmed – physically or financially. Consumer protection laws generally provide for reasonable attorney fees for plaintiffs' counsel.

I invite interested class action, environmental attorneys to give me a call.

Electronic meters are computers masquerading as meters. They sit in the same socket as a analog meter, but they lack several of the most important features of analog meters.

All meters are subject to NFPA 70: National Electrical Code (NEC), Article 240 - Overcurrent Protection - 240.4 Protection of Conductors). Washington law requires compliance with the National Electrical Code. See WAC 296-46B-010 which incorporates the entire NEC by reference.

For an electronic meter to comply with NEC, a properly sized 200-amp circuit breaker would have to be placed in front of the meter so the electronic meter will be able to survive most surges. None of these electronic devices were deployed with such circuit breakers added. The utilities ignore this regulation and just swap one device for another in total disregard to the enormous risks to consumers.

Had the utility companies complied with NEC requirements and put a grounded, surge protected circuit breaker in front of electric meters, the numerous fires, explosions, melting of devices, extensive property damage and in some cases deaths could have been avoided. The worst that could have happened would have been a popped circuit breaker.

However, adding a circuit breaker to the installation would have increased the cost of building these electronic meters by around $200, and would have

changed the profit maximization calculation. The manufacturers of electronic meters had to build them cheaply if they were to compete with analog meters, which can be bought reconditioned for $25 and come with grounding and surge protection built in.

Just because the federal Department of Energy is encouraging and even subsidizing the installation of electronic meters does not make them legal. Our agencies cannot be trusted because pro-industry hirelings have infiltrated them.

Most of us are trusting, too trusting, trusting to the point of being naive. We cannot imagine that there are no limits to the greed of corporations which have no codes of ethics. Corporations with no codes of ethics are evil versions of artificial intelligence. They will do anything to protect and increase profits, even if they will be sickening their own children. Actually, corporations do not have children. They do not care about the children of the humans who are complicit with their malignant form of artificial intelligence. Capitalism's main flaw is its inability to reign in its own excesses. It is blinded by greed.

I say in one of my songs:

> Do unto others - As you would have
> As you would have them - Do unto you.
>
> Hey, mister rich guy, I'm talking to you.
> Hey, big company, I'm talking to you.
> Hey, big government, I'm talking to you too.
> Do unto others applies to all.
>
> Profits must be - Goal number two.
> After doing something - Good for the world.
>
> You can make a tidy profit without fracking up the world.
> Do unto others applies to all.

People sometimes ask me if I am concerned that the fraudsters selling such profitable frauds will assassinate activists. This is unlikely because the fraudsters have other ways to make big profits; they are just lazy and will not change until forced to do so, whether by the passage of new laws or the filing of litigation.

Again, this is one of many laws which are routinely ignored when the laws interfere with powerful cash flows.

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In addition to emitting microwave radiation in the 900 megahertz to 2.4 gigahertz range, electronic meters emit dirty electricity at around 20,000 cycles per second. This is because electronic meters include a switched mode power supply to regulate voltage. The SMPS turns power on and off 20,000 times per second to cut off voltage peaks and prevent heat buildup.

Analog meters do not build up heat, and so analog meters need no SMPS.

The SMPS produces dirty electricity, also known as DE for short, technically known as "High Frequency Voltage Transients", also known as HFVT or "Conducted Emissions" or CE. Dirty electricity is the rapid, erratic and violent change in voltage that happens thousands of times per second instead of the normal 60 cycles per second electricity we are used to here in the USA.

Stray current is harmful to our health and damages appliances and equipment, burning them out prematurely. Wikipedia says:

> Disadvantages [of SMPS] include greater complexity, the generation of high-amplitude, high-frequency energy that the low-pass filter must block to avoid electromagnetic interference (EMI), a ripple voltage at the switching frequency and the harmonic frequencies thereof.
>
> Very low cost SMPSs may couple electrical switching noise back onto the mains power line, causing interference with A/V equipment connected to the same phase. Non-power-factor-corrected SMPSs also cause harmonic distortion.

Given these scientific findings, utility companies should not presume the safety of the additional radio and microwave radiation that advanced meters and their mesh network will produce. To the contrary, utility companies should presume these meters to be unsafe until proven otherwise. For health and safety reasons alone, installation of said advanced meters should cease immediately

The conducted emissions pulsed out by electronic meters exceeds FCC Class B specifications and are not compatible with consumers' existing electrical systems and appliances. This leads to early failure of appliances. Expect insurance companies to add exclusions to coverage against surges.

These electrical transients propagate through the electrical system of a building, turning it into an antenna which broadcasts unwanted electromagnetic radiation and dirty electricity upon occupants.

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Advocates of so-called advanced meters claim that they will enable consumers to monitor their usage in real time. However, the system lacks the transfer speeds sufficient to enable monitoring in real time. So usage can only be viewed on a next day basis.

On the other hand, there is real time monitoring software available on the open market, which does have the power to do usage monitoring in real time. Such software starts at $129. Search Amazon for the Eyedro Home Electricity Monitor. Thus, one of the major justifications given for so-called advanced meters – real time monitoring - is bogus.

The usage monitoring made available by said advanced meters will not result any savings to consumers. To the contrary, it will increase electric bills significantly.

The detailed minute by minute usage information obtained by said advanced meters is useless to customers who want to keep their bills down by avoiding electrical usage during peak times because such information is available only on a next day basis. Therefore, one of the major justifications given for so-called advanced meters – giving customers real time monitoring - is bogus.

The detailed minute by minute usage information obtained by said advanced meters is useless to system managers in their task of balancing overall loads. Measurements made at the substations are more than adequate for that purpose. Therefore, another of the major justifications given for so-called advanced meters is also bogus.

So-called advanced meters are receiving, broadcasting, and passing along radio and microwave reports every few seconds, up to 190,000 times per day, and in doing so will be consuming a considerable amount of electricity. For that reason, independent of other factors, they will consume more electricity than analog meters – which use only a minute amount of current to turn their fireproof aluminum wheels and report accurately on total watt hours used.

Reports from other service areas suggest that such receiving, broadcasting, and relaying consumes enough electricity to add around $10 per month to electric bills. Therefore, for this reason, independent of other factors, said advanced meters will consume more electricity and cost customers more money than analog meters.

In addition, so-called advanced meters do not measure usage as accurately as analog meters. Utility companies bill customers for the kilowatt hours of electricity consumed, but the GE digital meters do not measure kilowatt hours. They measure voltage and amperage peaks and use an unknown algorithm to make an estimated conversion of the peaks into watt hours. These calculations can be wrong, especially when the customer has various machines that turn on and off frequently and make brief but large voltage draws when motors turn on. This can result in artificially high watt hour reports and higher billings. Electronic meters perform differently in hotter, colder, dryer, and wetter conditions. On the other hand, analog meters measure watt hour consumption very accurately, regardless of high current draws or changing weather conditions.

Because the placement of said advanced meters will increase the amount of electricity consumed, they violate the letter and the spirt of the Kyoto and Paris climate protocols. They are the anthesis of green.

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Utility companies want to save money by reducing the number of meter readers. Any such savings is more than offset by other factors: the fact that so-called advanced meters cost more, that they break down after only seven years, that they will subject utility companies to liability, and that they will raise insurance rates or that insurance companies will exclude coverage, both for consumers and for utility companies.

The millions of dollars being spent to install smart meters and mesh networks should instead be used to equip every home with fiber optic or other fast internet connections. Through these fast connections, customers could monitor their own usage and report it to their utility companies on an automated basis through free software from the utility company. They could also use the software to monitor their usage on a real time basis.

Only if customers fail to report their own usage would the utility company charge the customer for a meter reading. And if customers are charged meter reading fees, those fees should be equal to the actual cost of reading meters. The $15.37 per month opt-out meter reading fee which Seattle is charging far exceeds the real cost of having a person read a meter.

Effectively, such large opt out fees, which are not rationally related to real costs, constitute an illegal form of discrimination against the poor and people of color, because they are unable to afford these extra fees.

As mentioned elsewhere, cell phones, tablets, and other wireless devices should all be capable of being plugged into hard wired connections at home, school, and work, so that cell phone talk, texting, Internet browsing, back up, and software updating can all be done through wired connections. We should be able to plug in on a hard wired basis and turn off our Wi-Fis at home, school, and work.

Schools especially should be connected on a hard-wired basis, not by way of Wi-Fis in every classroom. I pity the child who sits right by the Wi-Fi day after day. Wi-Fis in schools should turned off. The cost of running category six cable to each desk is small relative to the health of our children.

Likewise, connections in homes and workplaces should be wired whenever possible. Wi-Fis should be turned off at night or when they are not being used.

Necessary hand-held gadgets should connect to Wi-Fis designed to operate at safer frequencies and lower energy levels.

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The Coalition Against So-Called Advanced Meters is generally opposed to connecting nearly everything to the Internet, which seems to be goal of proponents of the Internet of Things. Most things should not be connected. There is nothing I really want to discuss with my oven. I do not want my refrigerator to order food for me. I am willing to walk around my home to turn my lights on and off. I need the exercise.

Equipment and appliances in our homes should not be connected to the internet. By definition, items connected to the Internet can be hacked. They will always be potential security holes. Will smart appliances all obtain SSL certificates? Who will upgrade software on connected items whenever a new virus comes out? No one will be compensated to keep up with security, and so electronic meters will be a gateway to a general loss of privacy.

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In summary, so-called advanced meters will cost consumers more than they are paying currently. Utility companies will not save money and will not increase their profits or surpluses. Such meters will raise insurance rates for both utility companies and for customers or will result in termination of coverage for surges. Such meters will expose consumers to more intense and more concentrated radiation than analog meters, which produce no radiation. They are more wasteful of electricity than analog meters. They are more

intrusive of privacy than analog meters. They are more hackable than analog meters. They will make some people sick in the short term, and they will affect the health of all of us in the long term.

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Seattle acknowledges that utility easements are required in the Seattle Right of Way Improvements Manual at 4.15.1, which states:

> Utility Easements
>
> Need for utility easements: When public utilities for sewer, storm, or power facilities are constructed on private property, a utility easement will need to be granted to the City. These easements are needed to establish rights for the City including, but not limited to, construction, operation, and maintenance access as needed to own and operate the facility. http://www.seattle.gov/rowmanual/manual/4_15.asp

According to the Washington courts, the general rule regarding limitations on the extent of easements is:

> We believe the servient owner is entitled to impose reasonable restraints on the right-of-way to avoid a greater burden on the servient owner's estate than that originally contemplated in the easement grant, so long as such restraints do not unreasonably interfere with the dominant owner's use"…. Rupert v. Gunter, 31 Wn. App. 27, (1982)".
>
> A servient owner is entitled to impose reasonable restraints on a right of way to avoid a greater burden on the servient owner's estate than that originally contemplated in the easement grant, so long as such restraints do not unreasonably interfere with the dominant owner's use. (Green v. Lupo, 32 Wn. App. 318, (1982).

Utility easements are easements just like road easements. Utility easements are subject to the same legal analysis as other easements. Easements have an intended scope, and so-called advanced meters exceed that intended scope.

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Analog meters are called "meters". So-called advanced meters and electronic meters generally are also called "meters". But the use of the same name is not proof that the term as used in utility easements granted many years ago is the equivalent of the term as used when applied to so-called advanced meters.

Our utility easements did not authorize anything less than a grounded, surge protected, and fireproof meter. Nor did the utility easement given in the past contemplate a downgrading of meters from rock solid and reliable to defective and insecure, which is another reason why electronic meters exceed the scope of the easements granted.

While the electronic GE digital non-communicating meters do not collect and broadcast our personal information, they too are not grounded, are not surge protected, are not grounded, and are not fireproof. As a bonus they come equipped with the same exterior terminal port as the communicating meters, into which someone with the right size optical probe can gain access unencrypted.

Due to their overall defectiveness, they also exceed the scope of utility easements granted.

In addition to being meters, these so-called advanced meters are wireless capable transmitters. They receive and pass along digital information from meter to meter to meter. None of this was contemplated when meter easements were entered into in the past.

Our utility easements did not authorize the collection of a minute by minute record of our every electrical behavior, nor the erecting of a Wi-Fi broadcasting and relay device on our homes, businesses, and schools, nor the creation of security holes.

There are marketing companies that are currently buying advanced meter information. Although Seattle has issued assurances that it will not sell personal and private data, there is nothing in Seattle regulations that would prohibit Seattle City Light or Landis+Gyr from doing so.

The electric meter easements given in the past years ago did not make any reference to a utility company collecting customers' private information and then having the right to sell it for a profit and doing so without obtaining the consent of customers and without compensating customers for the sale of their information.

Previous easements did not authorize a meter which could reach into our homes and turn on or off any or all electrical devices nor take over our cameras and watch us. The original easements did not contemplate this level of intrusion and control.

The utility easement did not contemplate the removal of completely confidential, non-hackable meters and their replacement with advanced meter surveillance devices, and so for that reason they exceed the scope of the easements granted.

Utility companies therefore have no easements which authorizes the install said advanced meters, and therefore utility companies should be asking customers to opt into receiving advanced meters and electronic meters instead of requiring those who do not want said meters to opt out.

Therefore, if a utility company erects so-called advanced meters without getting a new and broader easement, it is committing trespass.

The 4th Amendment to the United States Constitution says

> "The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated …",

Article 1, Section 7 of the Washington States Constitution says:

> "No person shall be disturbed in his private affairs, or his home invaded, without authority of law".

The 4th Amendment and the 14th Amendment are limitations on the power of federal and state governments. They do not limit the behavior of non-governmental persons unless they are acting as agents for government.

Article 1 Section 7 of the Washington Constitution may be broader in scope than the federal 4th and 14th Amendments because it is worded in the passive voice. It says, "no person shall be disturbed …", which may mean that there is constitutional prohibition of both government and non-governmental utility company from intruding into our privacy.

The routine collection of personal and private information with the potential to sell that information to third parties and to do this without the consent of customers and compensation to customers, the power to reach into homes and gather private information and even to turn off individual electrical appliances, and the setting up and maintain of equipment that could allow hackers to observe us electronically, visually, and aurally is a violation of customers' privacy rights under the US and Washington Constitutions.

So-called advanced meters have an exterior terminal port. Utility workers with the right size optical probe can plug into this port and have complete access to the said meter and to the entire AMI network. An intruder in possession of one of these probes could do the same thing. This is an unacceptable hole in our privacy and grid security.

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There should be no extra fees charged to those who decide to opt out or who decline to opt in, neither initial one-time fees nor continuing fees. The initial opt-out fee should be zero because it costs nothing just to leave an analog meter in place. There should be no continuing monthly opt out fee, but if there is to be one, it should cost no more than the actual cost to send out a meter reader. If consumers install utility measuring software on their computers and report their own meter readings electronically, they should not be charged any monthly fee.

Consumers who refuse to accept an advanced meter should not be required to accept a non-communicating advanced meter or a GE digital non-communicating meter. They should be allowed to retain their analog meter or in its place accept a new or refurbished analog meter.

It is believed that non-communicating advanced meters are exactly the same meters as the communicating meters, with the sole difference that the communicating function is turned off. It is believed that the communicating function can easily be turned on remotely from Seattle City Light headquarters of by Landis+Gyr, agent for Seattle City Light. The customer will have no way of knowing whether surveillance has been activated, and Seattle has no contractual duty to notify customers that surveillance has been activated, that his or her personal and private information is being collected, or that it is being sold.

Apparently, insurance policies still cover fires caused by electronic meters and damage to wiring and appliances caused by surges. However, insurance company actuaries will probably be raising rates to cover the risk of surges in areas where electronic meters are installed or excluding coverage for fires and other damages caused by surges.

Insurance policies already exclude coverage of harms caused by electromagnetic radiation. Insurance companies do their scientific research. They refuse to cover harms resulting from excessive risks. For example, insurance companies do not insure nuclear power plants or flood damage. Those markets are too risky and are left to the federal government. They do not

cover earthquake damage unless there is a special rider which is costly and has high deductibles.

Insurance actuaries pay attention to science. The fact that insurance companies are not willing to cover certain risks associated with so-called advanced meters should influence utility companies to discontinue taking such risks.

Because of the insurance implications relating to so-called advanced meters, I will be sending a copy of this letter to the Insurance Commissioner, Michael Kreidler.

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To summarize, let's compare our trusted analog meters. They provide the path to ground that electrical equipment can take advantage of. They contain spark-gap surge protection. They do not catch fire. They consume only a minute amount of electricity to turn the wheels as they very accurately measure watt hours used. They cost less than electronic meters and last longer. They contain no SMPS and therefore emit no dirty electricity.

Conversely, electronic meters lack a path to ground. They contain inferior surge protection in the form of a varistor, which is protective only up to 300 volts. They catch fire. Due to their switched mode power supply they emit dirty electricity and turn the entire home electrical system into an antenna, further exposing occupants to harmful electromagnetic radiation. They consume more electricity to operate. They are always on, always busy. They do not measure watt hours used but estimate watt hours based on average voltage and amperage peaks. They increase electric utility bills. They use more total electricity. They cost more. They have a shorter life expectancy.

Newer is not always better. Computerized is not always better. This is especially true in the case of electronic meters. The fact that electronic meters are so thoroughly inferior indicates that vendors have failed to fully inform the utility companies and have perhaps knowingly misled them into buying these inferior and defective meters.

The salesmen who did the misleading may have believed the lies told about so-called advanced meters and may himself been duped. Maybe he is being paid well and knows no other way to earn as much money. Upton Sinclair said, "It is difficult to get a man to understand something, when his salary depends upon his not understanding it!". However, at the highest levels, there are definitely knowing fraudsters.

Seattle should make inquiry into the representations made by the vendors of these meters. The city attorney or the Attorney General should bring a Consumer Protection suit against that vendors if misrepresentations were made.

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Chris Ivanovich is a member of Coalition Against So-Called Advanced Meters. He owns a ten-unit apartment building at 4500 Phinney Ave North, Seattle WA 98103. His ten tenants are members of the group as well. Acting through and on behalf of our group, I represent Chris and his ten tenants. They are all opposed to so-called advanced meters.

There are eleven new advanced meters in Chris' building. They are lined up in a row in the laundry area downstairs. There are ten meters for the ten tenants and one for landlord supplied electricity for common areas. All the tenants will be bathed in constant spikes of electromagnetic radiation, every few seconds, 24 hours per day. Units 1 and 2 are immediately above the laundry area and will be irradiated most intensely. The occupants of those units are the most concerned. Some tenants may choose to move to avoid the increased microwave radiation. Tenants doing their wash will also be irradiated intensely.

The tenants are concerned by the fact that Seattle City Light or its subcontractor Landis+Gyr will be recording their every electrical behavior. They will know when the tenants are home and when they are away. They will know when they turn off their lights at night and turn on a vibrator. Smart meter technology is capable of turning appliances and computers on or off and in theory capable of taking over microphones and cameras.

The Tenants are concerned that there is no prohibition against Seattle City Light or Landis+Gyr selling this private information to marketers, doing so without obtaining the tenants' consent, and doing so without compensating the tenants for the sale of their private information.

Even if the tenants were allowed to opt out, they would be issued a new, unsafe, advanced meter, but one with the surveillance and communicating functions disabled, not an analog meter.

As mentioned above, it is believed that non-communicating advanced meters are identical to regular advanced meters except that the communicating function has been turned off remotely and can be turned back on remotely, all without notice to the customer.

The tenants are concerned that because the so-called advanced meters will be connected to the Internet, it is possible that they can be hacked, whereas the tenants' previous analog meters, not being connected to the Internet, could not be hacked.

The tenants are concerned that many or most meter readers will be put out of work. The tenants are concerned that any savings to be obtained by laying off meter readers will be more than offset by the additional costs imposed by said advanced meters, both for increased electrical usage for broadcasting and surveillance and also for the shorter lifespan of said advanced meters. They believe that the savings claimed is a false savings when all factors are considered. They also believe that the additional monthly opt-out fee of $15.87 an arbitrary number and exceeds the true monthly cost of having a person read their meters.

Given the low level of encryption of said smart meters, their mesh network, and the fact that they come with a slot into which an optical probe can be inserted, through which slot one can gain access to the meter and the system, the tenants are concerned that Seattle City Light will not be able to secure said advanced meters and that Seattle City Light will have to engage expensive experts to try to secure said advanced meters and their mesh network from hackers and that this added cost, apart from other factors, will raise their electric bills.

The tenants are concerned because said advanced meters consume electricity in order to operate. Conversely, the analog meters they have now consume almost no electricity as their wheels turn. For this reason, independent of other factors, said advanced meters will use more electricity and raise electric bills.

The tenants are concerned that said advanced meters will be sending, receiving, and relaying microwave bursts every few seconds, 24 hours per day, and that for that reason, independent of other factors, said advanced meters will use more electricity than analog meters and increase the tenants' utility bills.

The tenants are also concerned because credible experts in the field report that electronic meters do not measure electricity as accurately as their previous analog meters.

The tenants are aware that those living in single family homes may opt out of having so-called advanced meters. They are aware that those who rent a single family house or buildings up to four units may also opt out, provided their

landlords agree. However, they are aware that because they live in a building with more than four units, they will not be allowed to opt out. The tenants are offended by this irrational discrimination.

There are more reasons and not fewer reasons why occupants of larger buildings should be allowed to opt out: In larger buildings more people are closer to more so-called advanced meters. Further, in larger buildings it is more likely and not less likely that there will be hard wired connections throughout the building, so that any monitoring of usage (total monthly usage only) could be done via a hard-wired connection. Further, those who live in larger apartment buildings generally have lower incomes and more of them are people of color, and so this opt-out policy discriminates against these disadvantaged classes.

The tenants are also offended that the schools, businesses, and hospitals they visit and where they might work, are not allowed to opt out.

The tenants are offended that people with solar roofs, who are net metered, will not be allowed to opt out. This policy will discourage owners from installing solar roofs and encourage those who already have them to stop using them.

The tenants are also offended by the fact that renters may not opt out unless their landlord consents.

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As mentioned earlier, another member of Coalition Against So-Called Advanced Meters is Chris Ivanovich. Chris owns the ten-unit building at 4500 Phinney Ave North, in which the ten tenants mentioned above live. His father built it in the 1950s.

Chris opposes said advanced meters on principle. He intends to opt out of having an advanced meter for his personal residence. Chris is genuinely concerned that his tenants will be irradiated against their will.

Chris also has financial concerns. He and his family depend on the income from the building. Chris is concerned that if so-called advanced meters are installed in his building that his tenants will – if they can – move to other places where they will not be irradiated.

Chris is concerned that potential tenants will be less likely to move into his building if they know that they will be irradiated by said advanced meters.

Chris is concerned that he might have to disclose to potential tenants that they will be irradiated by said advanced meters.

Real estate brokers and real estate multiple association will have to decide whether to require sellers to disclosure to potential buyers and potential tenants that they will be irradiated by said advanced meters.

Chris is concerned that it may be especially hard for him to rent the two units that are right above the basement and thus closest to the bank of said advanced meters or that he may have to reduce the rent for those two units in order to rent them.

Chris pays the cost of electricity for common areas, and Chris is concerned that said smart meter for said common areas will raise his electric bill. Chris is also concerned that his insurance premiums will go up.

Chris also takes the position that the easement given by his father in the 1950s when his father built the apartment building, or the easement given by some previous owner did not and does not authorize the addition of broadcasting capabilities nor the addition of information collection capabilities and the potential for the sale of that information, nor the installation of a generally inferior meter, one that is not grounded, not surge protected, and not fireproof.

For all the above reasons, Chris is concerned that said advanced meters will raise his expenses, reduce his income, and thus reduce the value of his building.

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On behalf of Coalition Against So-Called Advanced Meters, formerly known as Hard Wired For Security, I hereby demand that Seattle City Light terminate the installation of so-called advanced meters and replace those installed with analog meters.

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I am also submitting Requests for Disclosure of Public Records.

If the Washington Utilities and Transportation Commission does not already have research reports or other items responsive to the following requests, it means that the Commission has failed up to the present to do its due diligence regarding so-called advanced meters.

If the Commission fails to develop research reports on all of the issues raised by our Requests for Production of Documents, this will be evidence of its recklessness.

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There is one final issue which deserves mention. Somehow the Seattle City Council was bamboozled into voting – nine to zero – to implement its smart meter and mesh network initiative. Mark Twain said, "It's much easier to fool someone than to convince them they have been fooled. To change is to admit one was wrong, and people do not like to admit they were wrong.

I am amazed at how impervious to reason the previous Council was regarding this issue. Fortunately, there are some new members on the Council now, and so I would hope that the new Council will reconsideration its decision.

The previous Council and Mayor believed the advanced meter scam despite the enormous price tag. They did so despite the reams of paper submitted by members of Safe Utility Meters Alliance Northwest, also known as SUMA-NW, and despite the hours of testimony which SUMA-NW presented.

It is also fair to inquire as to whether Council members were accepting campaign donations directly or indirectly from the smart meter and wireless industries.

One also has to wonder whether Council members were subjected to techniques of group manipulation, which were perfected by Edward Bernays, double nephew of Sigmund Freud and the father of public relations. Even the socialist Council member Kshama Sawant, who should be most likely to be concerned about the health and welfare of ordinary people instead of big corporations, was duped.

Techniques of advertising, propaganda, marketing, and hypnosis overlap. People can be manipulated into believing and doing the strangest things through a combination of suggestive techniques, including the following: presentation by a believable presenter such as a doctor, dentist, or scientist; repetition; some arguments which appear to prove the case; a creation of prejudice against those who disagree, such as suggestions that those who oppose smart technologies are conspiracy theorists; and providing pat answers so that exits from manipulation can be prevented.

Sincerely,

James Robert Deal, as Attorney for
Coalition Against So-Called Advanced Meters
WSBA Number 8103

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REQUEST FOR DISCLOSURE OF PUBLIC RECORDS REGARDING ELECTRONIC METERS

March 8, 2018
Revised March 12, 2018

Read online at:
www.jamesrobertdeal.org/demand-that-utilities-commission-ban-smart-meters

Ashley Huff
Washington Utilities and Transportation Commission
Sent by email to: ashley.huff@utc.wa.gov; records@utc.wa.gov

Dear Mr. Huff,

Regarding this request for public disclosure, when I ask for "items", I am asking for any correspondence, letters, research, studies reports, writings, emails, recordings, memos, notes, or documents of any kind, whether in printed or electronic form, and whether in your possession or under your control.

When I refer to "you" I am referring to all executive and staff members of the Washington Utilities and Transportation Commission.

Items are considered to be under your control if sub-contractors of the Washington Utilities and Transportation Commission possess them – because the Washington Utilities and Transportation Commission has the right to request and receive them.

The term "advanced meters" refers to and includes the new electronic meters that Seattle City Light and other utility companies, public and private, are currently installing. They are also referred to as AMI meters. They include data collection, surveillance functions and broadcasting and relay functions that report data to headquarters. There are also advanced meters in which the communicating functions have been disabled.

The term "electronic meters" is broader. It includes the advanced meters as defined above and also such non-communicating meters as the GE electronic meters. The term does not include analog electromechanical meters.

When I refer to “surveillance features” or “broadcasting features” and I am referring to the components of advanced meters that record personal and private information of electric customers regarding their electrical behavior and that transmits that data through a mesh network to neighboring advanced meters and eventually to headquarters.

When I refer to “analog meters” I am referring to the all metal, fireproof, grounded, and surge protected analog electro-mechanical meters that are currently in place on most Seattle homes and businesses.

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The Coalition also requests that any fees for providing the items requested be waived, given that obtaining responses to these requests is in the public interest. The requested items will be made available to the general public free of charge on one of my web sites and is not for commercial use.

In the event that you are unwilling to waive fees for providing the items requested, you should inform me of the total charges in advance of fulfilling our request. We would prefer that responses not be sent in paper format but instead that they be sent by e-mail attachment, by posting to a Dropbox account, or some similar account, or by mailing a CD-ROM.

We look forward to receiving your responses to these requests within five business days, as the statute requires.

If there are requests that will take more than five business days for you to respond to, then you should respond to those requests for which you have responses readily available, and regarding those requests that will require more than five days to respond to, please identify those requests and give an estimated time when you may be able to respond.

Therefore, please respond to the following requests for disclosure of documents:

1. Please send me any items that list and describe the types of electrical meters that public and private utilities are installing in Washington, for ordinary residences, for medium usage customers, and for high usage customers.

2. Please send me any items that list and describe the activity or participation of Landis+Gyr in connection with so-called advanced meters in Washington.

3. Please send any items which list the utility companies, public and private, which have installed or are planning to install so-called advanced meters.

4. Please send me any items that address whether the broadcasting and surveillance features of so-called advanced meters and the right of the public utility to collect and/or resell private data were "originally contemplated" when electric utility easements in Washington were created.

5. Please send me any items that address whether the additional costs that said advanced meters will impose for their broadcasting and surveillance features were "originally contemplated" when electric utility easements were created.

6. Please send me any items that address whether meters which would have to be replaced in seven instead of 40 years were "originally contemplated" when electric utility easements were created.

7. Whereas the 4th Amendment to the United States Constitution says

> "The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated …", and

Whereas Article 1, Section 7 of the Washington States Constitution says:

> "No person shall be disturbed in his private affairs, or his home invaded, without authority of law",

please send me any items pertaining to whether the surveillance and broadcasting aspect of said advanced meters violate customers' rights to privacy under the foregoing constitutional provisions.

8. Please send me any items that allow, authorize, or bar public or private utilities or their agents regarding the sale of private information that they collect through the surveillance and broadcasting features of advanced meters.

9. Please send me any items pertaining to whether said advanced meters are subject to being hacked.

10. Please send any items pertaining to whether such potential for hacking violates consumers' rights to privacy by making customers more exposed to being hacked.

11. Please send any items pertaining to whether exposing consumers to the increased likelihood of being hacked is negligence on the part of the public or private utility.

12. Please send any items regarding the external socket on said advanced meters, into which an optical probe can be inserted, including information regarding whether a person plugging into said socket can access said meter, and/or the entire mesh network, and/or the entire electrical system.

13. Please send me any items that pertain to advanced meter opt out policies in public and private utilities, including any items that pertain to how much should be charge in order to opt out.

14. Please send me any items that address the opt out policies of public and private utilities with regard to apartments with more than four units, schools, businesses, hospitals, and homes with net metered solar roofs, including any items that explain why these users are not allowed to opt out.

15. Please send me any items that address how much electricity advanced meters which have the communicating function engaged consume as they operate.

16. Please send me any items that address how much electricity advanced meters which have the communicating function disengaged consume as they operate.

17. Please send me any items that address how much electricity analog electromechanical meters consume as they measure usage.

18. Please send me any items that pertain to the cost of new and refurbished analog electro-mechanical meters.

19. Please send items that address the availability of new and refurbished analog meters.

20. Please send me any items that show the cost of the AMI mesh network including relays, computers, and the cost of installation.

22. Please send me any items that address the expected useful life of analog electro-mechanical meters.

23. Please send me any items that address the expected useful life of electronic meters and advanced meters.

24. Please send me any items that address whether advanced meters that have the communicating function enabled will be busy 24 hours per day on a minute-by-minute basis, sending, receiving, and relaying microwave transmissions that report on electrical usage.

25. Please send me any items that address whether the communicating function of said smart meters will increase electric bills and by how much.

26. Please send me any items that show whether so-called advanced meters meet the accuracy requirements of WAC 480-100-338. Please included actual test results. Please include test results for analog electro-mechanical meters.

27. Please send me any items pertaining to adverse effects of said advanced meters on birds and insects.

28. Please send me any items pertaining to electro-sensitivity to electromagnetic radiation. Please include any items pertaining to the portion of the population that is electro-sensitive. Please include any items pertaining to the effects of said advanced meters on those who are electro-sensitive.

29. Please send me any items pertaining to adverse effects of so-called advanced meters on eyes, for example, in exacerbating cataracts.

30. Please send me any items pertaining to the dollar amount of up-front opt out fees and continuing monthly opt out fees.

31. Please send me any items that address whether leaving present analog meters in place will incur any up-front cost at all and if so, how much.

32. Please send any items that address why a person who opts out of receiving a new communicating advanced meter is required to accept a new non-communicating advanced meter instead of being allowed to keep his or her existing analog meter or receive a new or reconditioned analog meter.

33. In light of the fact that part of utility companies' justification for installing advanced meters is to reduce the number of meter readers and save money on their salaries, please send me any items pertaining to why advanced meters report and relay information minute by minute and even every few seconds instead of once each billing cycle.

34. Please send any items that address the potential for said advanced meters to catch fire.

35. Please send any items that address the policy of utility companies, public and privately owned, to remove said advanced meters immediately after they have caught fire, instead of retaining them for inspection by insurance investigators and the fire department.

36. Please send me any items that address whether those advanced meters which communicate and those which do not communicate are of the same design, with the communicating function either enabled or disabled, and whether the communication function can be turned on or off remotely by the utility company, by physically toggling a certain switch on said meters, or only by replacing a communicating advanced meter with a non-communicating meter.

37. Please send me any items that address whether and how non-communicating advanced meters can be changed remotely from non-communicating to communicating mode.

38. Please send me any items that discuss how customers will know if their so-called advanced meter has been changed from non-communicating mode to communicating mode.

39. Please include any items that discuss the varistor in electronic meters. Include any items which discuss the maximum current levels which they protect against.

40. Please send any items that address the potential for said advanced meters to catch fire.

41. Please send me any items pertaining to the qualifications of the installers of said advanced meters and whether they are certified electricians.

42. Please send me any items that pertain to surge protection in advanced meters and in electronic meters generally.

43. Please send me any items that pertain to grounding or the lack thereof in advanced meters and electronic meters.

44. Please send me any items pertaining surge protection in analog meters.

45. Please send me any items pertaining to grounding in analog meters.

46. Please send me any items pertaining to current, future, or possible implementation of 5G cellular technology and broadcasting antennas in Washington.

47. Please send any items that discuss whether so-called advanced meters and electronic meters increase total electrical usage.

48. Please send any items that discuss whether advanced meters and electronic meters violate the letter and the spirt of the Kyoto and Paris climate protocols.

49. Please send any items that discuss the number of meter readers needed to read meters as a percentage of the total number of meters.

Sincerely,

James Robert Deal, as Attorney for
Coalition Against So-Called Advanced Meters
WSBA Number 8103