

**From:** [Mark Wahl](#)  
**To:** [UTC DL Records Center](#)  
**Subject:** Comments on Public Counsel Submission to U-180117  
**Date:** Tuesday, March 13, 2018 4:38:51 PM  
**Attachments:** [Mark W Response to Public Council Document.pdf](#)

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For: Docket: U-180117

From: Mark Wahl

Date: March 13, 2018

Title: COMMENTS ON THE SUBMISSION FROM THE PUBLIC COUNSEL

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
**RE: COMMISSION POLICY ON CUSTOMER CHOICE FOR SMART METER INSTALLATION**  
**DOCKET U-180117**  
**COMMENTS ON THE SUBMISSION FROM THE PUBLIC COUNSEL**

This is a brief statement of concern about the 12-page submission to the Docket from Carla Colamonici for the Office of Public Counsel. This feels called for in view of some considerable limitations on what was seemingly relied upon to constitute an opinion that could carry some weight with your group.

A main concern is that the report concludes with and supports the view that a reasonably-priced opt-out option containing an initial fee and monthly surcharge will basically solve the problem of “customer choice” that the WUTC policy analysts are now considering. However the evidence alluded to for this opinion has some serious holes in it. Consumers’ concerns go well beyond whether or not a so-called “smart” meter is placed on their dwellings. The Counsel document shows only dated and rudimentary knowledge that seems to minimize even the problems caused by meters on buildings and it exhibits no knowledge that consumers have concerns with the whole AMI meter system that an opt-out will not address.

In the Counsel document, the only mention of reasons for customer concerns about participating in the AMI program is found on page 3. “Many customers refusing smart meters cite to health, security, and privacy concerns. While the actual effects of these concerns are highly debated and contentious, utility customers should have the option to refuse a smart meter based on these individual concerns.” (Note that the opt-out is already indicated here as perhaps the only option.) The footnote 6 for this statement leads to a document that contains it essentially verbatim. It is a 2012 article from Black & Veatch (<https://www.bv.com/docs/articles/the-opt-out-challenge.pdf>) containing quite dated, industry-biased statements on the harmlessness and virtues of smart meters.

For example, the above article authoritatively states things that have been thoroughly disproved, e.g., “Significant research and studies clearly document that smart meter RF transmissions present no harm to health or the environment, yet this is a key concern voiced by consumers.” There are several tired, scientifically-debunked statements like “RF emissions from smart meter systems are significantly less than those from common devices such as cordless phones, microwave ovens and the natural RF emissions from the planet Earth. Smart meter RF emissions are even less than what you are exposed to from an individual standing next to you.”

A vast wealth of more recent peer-reviewed information is available that shows how strong the RF from smart meters really is and what damaging health effects can and do result. Other countries outside the US have chosen to take RF health concerns far more seriously. The FCC’s permissive heating criterion (from the 1980s) that underlies its mandated radiation limits has been thoroughly discounted by all serious researchers as a regulation that belongs in a category somewhere between the dinosaur and the ostrich. I won’t try to rebut each outmoded inaccurate assertion of this paper that appears to have been taken quite seriously by the author of the Counsel’s commentary here, but I refer to my own **March 7, 2018 submission to this WUTC Docket under “Mark Wahl”** that gives a much more nuanced and referenced look at the reasons that customers are resisting smart meters and considering an opt-out as an insufficient remedy for the problems of the AMI system.

People who opt-out still must live with many problems beyond the “health, security, and privacy concerns” only passingly mentioned in the Counsel’s document. These are such things as built-in factors that inflate meter readings, under-read reverse inputs from distributed energy sources, engender

ultimate rate hikes, strongly increase cyber-vulnerability to catastrophic system-wide crashes, and create heightened risk of exposure of company customer data, among other problems.

In this writer's opinion, the WUTC should not grab onto the simple "opt-out" recommendation of the Counsel as the policy for the upcoming years. At the *very least* they should also consider free-opt-out and opt-in options as being more fair, but certainly the WUTC must also not believe they have addressed all of the many problems of the AMI systems by adopting an opt-out policy. The Counsel mentions the huge burst of corporate AMI installation activity, about to begin with Avisia, PSE and others. WUTC, putting all of its eggs in the "opt-out" basket could find itself behind the curve as they are asked to raise rates to support these flawed programs. (Several states have scrutinized these programs, sometimes early, sometimes too late, and have found they have less ROI than predicted.) Concurrently, electrical customers from here on out will be growing in sophistication about the problems of AMI. They will be growing in their disgruntlement about the lack of AMI's supposed benefits as they see (as already some WA PUD customers have) their meter readings suddenly rise, electric rates on a rising ramp, and their health being challenged.

In examining customer options please avail yourself of all data showing that these AMI programs raise a variety of very real risks while they provide only minor benefits to customers. Check the data that electric companies also create low-balled estimates of the vast ever-growing complexity and expenses of the AMI systems even as they continue to predict increased efficiency and energy saving. Check the cases of where it has happened that when savings inevitably fall short of costs, rate-payers find themselves making up the difference as they endure many other risks to health and security as well.