

From: [Olemara Peters](#)
To: [UTC DL Records Center](#)
Subject: Docket U-180117 re AMI Opt-Out/Opt-In - SCL's contradictory info
Date: Tuesday, March 13, 2018 3:12:32 PM

Docket U-180117 re AMI Opt-Out/Opt-In - SCL's contradictory info

From: Olemara Peters

March 13 2018

Dear WUT Commissioners,

The e-thread I'm copying below is a small example of the kind of runaround encountered at SCL, in attempts to get even a reliable answer about the "Opt-Out" that SCL purports to be offering.

I don't wish to comment about individuals — Mr. Thomsen (SCL "Senior Strategic Advisor, Communications & Public Affairs") has provided only the latest of countless SCL self-contradictions. But this sequence is a succinct enough example to be worth your looking at. It yet-again makes me wonder:

- How many more seemingly nice clear answers (e.g. in Mr. Thomsen's Sept 25 email below) have likewise gotten reversed since?
- What's to stop any of his (let alone any other staffperson's) current purportedly-definitive statements from changing further?

Even apart from concerns of content (AMIs' and other "smart"-meters' inappropriatenesses as to bioharm, privacy, security, fire-safety, overbilling, replacement-expense, etc. — all with no resolutions other than SCL's denials) --

how can SCL be talking about what to charge for "Opt-Out," when

- they are this unclear about even whom they'll allow TO "Opt-Out"? and
- they are willing to consume their "customers'" time, this unlimitedly, to follow such zigzag? What business treats people it calls its "customers" like this? (And I don't imagine SCL is the only one. The questions I've attempted to ask PSE, too, about their AMR's they've imposed on my property, have never gotten anywhere either.)

And, how can the WUTC plan to complete discussion, about an "upgrade" whose policies slipslide so spectacularly? Do you in fact have authority to require a utility to stand behind its statements reliably?

Please, keep your comments-window open for folks' further adventures about Opt-Out / Opt-In!

Please see my previous comments,

- [emailed Mar 12] DOCKET U-180117 - reply to WUTC's questions
- [emailed Mar 13] DOCKET U-180117 AMI's Opt-Out / Opt-In? (my March 8 cmt, updated)
- [emailed Mar 12] DOCKET U-180117 - AMI repelling wild birds

Thank you!

Sincerely,

Received
Records Management
03/13/18 15:20
State Of WASH.
UTIL. AND TRASP.
COMMISSION

Olemara Peters
Redmond, WA

Begin forwarded message:

From: "Thomsen, Scott" <Scott.Thomsen@seattle.gov>
Subject: RE: AMI "Opt-Out" -- available for condo owners?
Date: March 13, 2018 at 8:20:19 AM PDT
To: Olemara Peters <claricom@frontier.com>

Olemara,

Thank you for your email. I'm happy to answer this and any other questions you might have.

At the time of my correspondence with Liselotte Kragh, there was an effort to differentiate condominium owners from renters in large apartment complexes. That fall, our position was clarified, eliminating that distinction. I apologize for any confusion.

Multi-family buildings with five or more units are not eligible for opting out.

Single family homes, duplexes, triplexes and four-unit buildings are eligible.

If you own the home, you can opt out and request a non-communicating digital meter. If you are a tenant, you need to get approval from the property owner in order to opt out.

Please let me know if there is anything else I can help you with.

Sincerely,

SCOTT THOMSEN
SEATTLE CITY LIGHT
TEL (206) 615-0978 CEL (206) 200-9614

From: Olemara Peters [<mailto:claricom@frontier.com>]
Sent: Monday, March 12, 2018 8:57 PM
To: Thomsen, Scott <Scott.Thomsen@seattle.gov>
Subject: AMI "Opt-Out" -- available for condo owners?

Hello Mr. Thomsen,

I'm cheered by your (June 16 2017 email to Liselotte Kragh, copied below) nice clear explicit answers.

Please can you confirm whether

24. If you are the owner of your own unit, whether it be a single-family home, a condo, a part of a duplex, a triplex etc. and **it is individually metered**, you can **opt-out** from smart meters and request an **opt-out digital meter** instead.

is still the policy?

I've been getting contradictory answers about this (I'm copying a sampling of them below), so would be very glad to hear definitively from you.

Sincerely,
Olemara Peters

<http://www.seattle.gov/light/ami/opt-out.asp>

Eligibility Guidelines to Opt-Out

- Customers who live in multi-unit apartment buildings with 5 or more units are not eligible to opt-out.

on the <AMI-opt-out-application.pdf> :

Eligibility Guidelines to Opt-Out

- Customers who live in any type of multi-unit dwelling with five or more meters in one location (i.e. a meter room or exterior wall) are not eligible to opt out.

From: SCL_Advanced_Metering
<SCL_Advanced_Metering@seattle.gov>
Subject: RE: AMI "Opt-Out" -- available for condo owners?
Date: March 12, 2018 at 8:04:14 AM PDT
To: Olemara Peters <claricom@frontier.com>

Dear Olemara

The Opt Out eligibility guidelines state "Customers who live in any type

of multi-unit dwelling with five or more meters in one location (i.e. a meter room or exterior wall) are not eligible to opt out."

So if the meters are not centrally located in the building on a wall or in a room you would be able to Opt Out. Hope this answers your question.

Thank you

Seattle City Light
Advanced Metering

From: Olemara Peters [<mailto:claricom@frontier.com>]
Sent: Saturday, March 10, 2018 3:13 PM
To: SCL_Advanced_Metering
<SCL_Advanced_Metering@seattle.gov>
Subject: Re: AMI "Opt-Out" -- available for condo owners?

Dear Ms. Woo,

Thank you again for your clarifications below! Please can you confirm that they are still accurate? (The condo building in question is more than 5 units.)

Sincerely,
Olemara Peters

From: SCL_Advanced_Metering <SCL_Advanced_Metering@seattle.gov>
Subject: RE: AMI "Opt-Out" -- available for condo owners?
Date: September 25, 2017 at 2:15:45 PM PDT
To: Olemara Peters <claricom@frontier.com>, SCL_Advanced_Metering <SCL_Advanced_Metering@seattle.gov>, "Langdon, Dan" <Dan.Langdon@seattle.gov>
Cc: SCLEnergyAdvisor <SCLEnergyAdvisor@seattle.gov>

Dear Olemara,

To answer your questions:

Condo owners in any size building can opt-out.

LIANA WOO
SR. CUSTOMER SERVICE REPRESENTATIVE
SEATTLE CITY LIGHT

CUSTOMER CARE DIVISION | ADVANCED METERING PROGRAM



SCL_Advanced_Metering@seattle.gov

From: "Thomsen, Scott"
<Scott.Thomsen@seattle.gov>
Date: Friday, June 16, 2017 at 2:24 PM
To: Liselotte Kragh <lotte@abitastudio.com>
Subject: RE: SMART METERS

Ms. Kragh,

You have indicated several times that you intend to publish a brochure regarding Advanced Metering. Seattle City Light does not endorse, certify or approve of any such independent brochure. In addition to the direct notifications we are providing our customers, accurate information about the program is available on our website at www.seattle.gov/light/meters or by contacting us at (206) 727-8777.

Taking your statements as questions, I have prepared the following responses.

STATEMENTS RELATED TO SMART METERS:

1. In July of 2017 Seattle City Light (SCL) will begin the mass deployment of smart meters throughout its service area, completed by neighborhood in the following order Ballard I
City Light has three operational areas: The Snohomish County Line to the Ship Canal, The Ship Canal to Yesler Way, and Yesler Way to s 160th Street. The project will begin in the zone from the Snohomish County Line to the Ship

Canal.

2. Prior to July 2017, smart meters might have been installed on new construction and are currently read as digital meters.

Advanced meters have been installed on new construction and service upgrades since October 2016.

3. Seattle City Light's service area includes all of Seattle, Shoreline and Lake Forest Park and parts of unincorporated King County, Burien, Renton, Normandy Park and Seatac. The entire service area will be converted to the AMI.*Correct*
4. Seattle City Light will replace about existing digital and analogue electro mechanical meters on residential units in its service area.

Seattle City Light currently has about 420,000 meters. It will replace all of them and anticipates about 30,000 new installations by the end of 2018.

5. The Seattle City Council provides oversight over Seattle City Light through its Energy and Environment committee previously led by Mike O'Brien and currently by Kshama Sawant. These two council members have supported and spearheaded the process of converting our existing system to AMI (Advanced Metering Infrastructure). The entire council approved the \$_____ million initial expenditure and associated rate increases on _____. The

estimated cost at the time of approval by the Seattle City Council was \$_____. The current estimated cost, per 23rd May 2017 is \$_____. The maximum cost approved by the City Council is \$_____

Rates are not set by the cost of the metering alone.

6. Smart meters have been suspected of causing fires due to potential incompatibility with old or faulty wiring in older homes. Regardless of whether this is considered a plausible occurrence or not, should incompatibility between the wiring of an older home and a new smart meter be found to cause a home fire, SCL and rate payers will accept full monetary responsibility.

Maintenance of a building's electrical system, including the socket that the meter plugs into, is the property owner's responsibility. Should our installers encounter an unsafe condition in the meter socket (such as corrosion, loose jaws, evidence of arcing, or scorched conductors), they will alert their supervisor, and we will work with the property owners to make corrections. However, there is nothing inherent in the design of the advanced meters that would affect a building's electrical system. Any meter, electro-mechanical, digital, or advanced, plugs into the jaws on the socket

7. Smart meters communicate which

appliances and how many lights are on at a given time, assuming the appliance is outfitted with compatible technology. As such the utility will know when a resident is home or gone from the home and will be able to ascertain the customer's pattern of coming and going. The utility has provided the following security measures to safe guard this data from employees or others who may have access to said data and who may use this data to target the customer:

*City Light's advanced meters will **NOT** communicate with appliances or lights. The meters will only record the energy consumption of the entire home or business in 15 minute increments. That energy use could be anything from electric heat to car charging, to water heater and refrigerator cycling, none of which is evidence of occupancy. Access to the usage information will be on a need-to-know basis, with user rules and responsibilities outlined, and appropriate agreements in place.*

8. User data can be used to create a user profile and such profiles is a potentially very profitable revenue stream for utilities if sold to commercial interests. As a condition of instituting the AMI, SCL assured Kshama Sawant and other council members that the data will never be sold to government or business interest. The promises were backed up with the following legally binding

document: _

*Seattle City Light does not sell customer information. Disclosure of personally identifiable information, including consumption information, is governed by state law. As a public agency, City Light is obligated to disclose some customer information, including the amount of electricity consumed in a billing cycle, upon request by the media or other members of the public. City Light will disclose that information to law enforcement only when there is a written request stating there is reason to believe the information will help determine whether a crime has been committed. (RCW 42.56.335) If a customer signs up for a service that results in City Light obtaining consumption information for shorter periods than a billing cycle (e.g., hourly consumption information), City Light will not disclose that information **to any other parties.** (RCW 42.56.330(2))*

9. User data collected from smart meters will be kept for ___ years, after which they will be destroyed.
Retention of data used by City Light is subject to the City of Seattle Records Retention Schedule. Billing information is retained for six years. Other data can be deleted sooner once its use is no longer needed.
10. The smart meter computer system allows the utility to remotely turn off electricity to a customer or to a

group of customers. This is highlighted as a primary benefit of the new system. SCL has provided the following safeguards against remote and hostile hacking that could turn off power to individual customers or the entire electrical grid.

Advanced metering is made up of hardware (meters), communications (RF network), and data (IT). The technology has several layers of security, which is intended to prevent any form of intrusion and allow only City Light to manage and operate the network and its data. This will assure the data for City Light's customers are secured and managed according to City of Seattle codes and Washington state laws on data privacy. There is no connection, physically, mechanically, electronically or otherwise, between the Advanced Metering communications network and the supervisory control and data acquisition systems of the City Light generation, transmission and distribution systems.

11. SCL will purchase its new smart meters from Landis & Gyr. SCL will also replace all existing functional digital and analogue meters on homes owned by **opt-out customers**. The reason these existing meters need to be replaced by a digital meter supplied by Landis & Gyr is

The majority of City Light's

meter inventory is past its expected lifespan. By replacing all meters at the same time, we will achieve economies of scale and operational efficiencies due to standardization

12. SCL claims that smart meters will produce a more accurate reading of electrical usage than analogue or digital meters. The accuracy of the proposed Landis & Gyr digital **opt-out** meters fall within a range of $\pm 0.02\%$. The accuracy of Landis & Gyr smart meters falls within a range of $\pm 0.02\%$

Utility Meter Accuracy in the United States is governed by the American National Standards Institute (ANSI) Standard C.12.20. Digital meters maintain the accuracy standard much better than electro-mechanical meters. The accuracy of an advanced meter and a non-communicating digital meter is the same. Both are accurate to within 0.1% That is 10 times more accurate than the electromechanical meters were tested for when they were new, which was accuracy within 1%.

13. The capital cost of the new AMI computer system, the meters and other components plus installation cost is already reflected in a _____% increase in the residential KWH rate. This rate increase will be in effect from _____ to _____.

Rates are based on many factors, not just metering: Cost of wholesale power purchases and sales, capital projects, labor costs, and regulatory costs are among the many considerations. Additionally, Advanced Metering will reduce some operational costs by eliminating the need for meter readers, reducing the risk of electricity theft, making outage restoration more efficient and in many other ways. Over the life of the advanced meters, Seattle City Light expects to achieve significant cost savings that will help keep rates lower than they would be otherwise.

14. Seattle City Light and the Seattle City Council hopes to permanently eliminate 65 union living wage meter reading jobs from the Seattle job pool. This is highlighted as a primary benefit of the new system.

The number of full-time meter reader positions is currently 31, with the balance being filled by temporary employees. We have eliminated other positions through the years, such as lineworker helpers and appliance repair technicians. We expect to maintain a small staff of meter readers to handle opt-out customers and troubleshoot situations

where an advanced meter is not reporting. Meter reading positions will be repurposed to address other utility needs.

15. Seattle City Light will use technicians supplied by Smart Grid Solutions to replace all residential meters. These technicians will not be licensed electricians and they will not be local workers. The installers will have been trained to identify a compromised meter base prior to installing the smart meter and will notify home owners if the smart meter is incompatible with the home's meter base. If such incompatibility is found, the existing meter will be re-installed until the home owner can afford to correct the situation.

The majority of the workers hired by our installation contractor, Aclara, will be local. Meter compatibility is not an issue, but unsafe conditions within the socket are. City Light will make every effort to keep customers in power, but cannot guarantee that they will reinstall a meter.

16. In addition to the physical installation of smart meters and associated hardware throughout the city, SCL plans to hire eight employees to maintain and manage the new computer system and to analyze collected data. The hires will be contracted with Landis & Gyr. These added SCL staff members will be 24/7 staff with average salaries of \$90,000 and range of salaries from \$80,000 to \$100,000. The total cost of

computer staff resulting from the smart meter conversion is a yearly cost of \$640,000.

Maintenance of the Advanced Metering communications network and other systems will be performed by Landis + Gyr under a managed services contract.

17. The life span of the soon to be abandoned analogue meters is approximately 40 years and the life span of the newer digital meters, already installed on most homes, is approximately 15 years. The expected life span of the new smart meters are 5-9 years after which they will need to be replaced along with upgrade to the associated computer system. SCL hopes to get 10 years of life out of the smart meters, but may choose to replace sooner due to computer system upgrades. The expected repetitive cost is expected to cost _____ per KWH permanently.

The expected lifespan for advanced meters is 15 years. Electromechanical meters are no longer being manufactured.

18. SCL has budgeted \$_____ for potential individual or class action lawsuits.

The City of Seattle is self-Insured. Claims against the city are handled by the legal department and the office of risk management.

STATEMENTS RELATED TO BILLING:

19. Residential electrical billing will remain bi-monthly because a AMI is a "Green" Program with the stated purpose primary of saving gasoline and other natural resources and to save the rate payers labor cost. Monthly billing would double the waste of paper and double to cost to prepare and deliver the bills, so this is not compatible with the stated goal.

City Light reserves the right to go to monthly billing. It's incorrect to suggest that we are sending out all paper bills. A growing number of our customers prefer to receive their bills electronically.

20. Seattle residents are currently billed for electrical usage every second month and the bill is offset from the bi-monthly utility bill, which is also billed the alternate month. In most instances the utility bill is the highest. Keeping the electrical bill offset and bi-monthly will prevent undue cash flow strain on Seattle families.

In most instances, City Light bills residential customers on a bi-monthly basis, but that it not universally true. Certain residential routes are monthly.

The timing of when a particular customer receives a City Light bill and a Seattle Public Utilities bill is based on meter reading schedules. Some customers receive both bills in the same month.

The only customers who

receive Seattle Public Utility bills are single family homeowners and landlords within the City of Seattle (and a few outlying areas). Our suburban customers receive water and sewer services from one of several water districts (depending on where they live) Our condo and multi-family customers receive their water service either as part of their rent/dues, or through a third party billing agency.

Focus groups and marketing studies have shown that customers would prefer a monthly electric bill.

21. After all the cost and savings of the changes to the electrical grid are accounted for (*Initial infrastructure cost, computer systems and staff, billing, an expected ongoing meter and computer replacement expense, interest payments and other financial expenses associated with the conversion less the labor cost savings from the obsolete meter reader jobs*) the AMI is expected to save rate payers money. Saving money is the primary reason for the conversion. Savings will be reflected in an estimated KWH rate of \$_____. The rate reduction will take effect on _____.

Again, you cannot estimate rates based on the cost of metering.

STATEMENTS RELATED TO THE OPT-OUT PROGRAM:

22. In response to opposition to smart meters and AMI technology, the City Council Energy and Environment Committee, required that SCL offer an **opt-out option**. As chair of the Energy and Environment committee during the approval phases of the AMI conversion, Kshama Sawant's office is responsible for the content and implementation of the **opt-out program**.

The Opt-out program is a departmental policy, and as such is not subject to council approval. However, in the case of the opt-out policy, we did inform the council of its content and ask for input.

23. The **opt-out program** is a permanent program offered to both existing and future SCL customers. *Correct*

24. If you are the owner of your own unit, whether it be a single-family home, a condo, a part of a duplex, a triplex etc. and *it is individually metered*, you can **opt-out** from smart meters and request an **opt-out digital meter** instead. You cannot keep your existing meter nor ask for an analogue meter. *Seattle City Light owns the meters.*

25. **The opt-out program** will **not** be offered to any type of commercial or institutional account. This means that schools, office buildings, light commercial buildings, stores etc. cannot decline the technology. *Correct*

26. **The opt-out program** will **not** be

offered to customers who already have solar panels or who wishes to install solar panels. Per state law net metering requires that the solar meter is read on the 30th of June. SCL will no longer provide meter readers on that day for those solar panel customers who may wish to opt out nor accept photographs of read outs which is an option currently offered to solar customers. No alternative solution has been offered to the solar panel home owners who committed to a net-metering contract with SCL prior to the installation of smart meters.

Solar customers are not allowed to opt out because they are generating power which feeds back onto the grid (which City Light then purchases). While solar arrays tend to be small, in the aggregate they are a large source of generation. To avoid problems with the efficient and reliable operation of the power grid, we need to know the location of the systems and how much they are feeding in.

27. **The opt-out program** will only be offered to the residential portions of a mixed-use building or a condo building. The common areas of a condo building are considered commercial so the associated meters will be smart meters - even if the condo association decides to opt out the entire building.
The opt out provision is not available to commercial accounts.

Common areas are billed as a commercial service and are not eligible for opt out.

28. To manage the **opt-out program**, the SCL charges its **opt-out customers** a one-time fee of \$124.43 or \$49.77 for income qualified. This fee will be on the first electrical bill after **Opt-out paperwork** has been submitted. Future opt-out customers will be charged this same one-time fee if they do not already have an opt-out meter on their residence. *The opt out administrative fee will be charged as soon as the application is approved. When an opt-out account is closed, City Light will install a standard advanced meter. Should a future customer wish to opt out, he or she will have to submit an application and pay all appropriate fees.*
29. A customer who waits to opt out to within 2 weeks of the installation or after, will be charged an additional \$84.21 or \$33.68 for income qualified. *Correct*
30. Digital meters must be read manually bi-monthly. **Opt-out customers** will be charged an ongoing meter reading cost of \$15.87 per billing cycle and \$6.35 for income qualified. (respectively \$7.94 or \$3.18 per month).
Non-communicating digital meters must be read manually. For the typical residential customer, this happens every two months. Some residential customers already receive monthly bills.

31. Once an electrical meter associated with an address or unit has acquired **opt-out status**, there will be no further set-up charges for future accounts using the same digital electrical meter, whether these be a new owner or a new renter. New account holders of the same address will be offered free Smart Meter opt-in.

When an opt-out account closes, Seattle City Light will replace the opt-out meter with an advanced meter. If the new owner or tenant wishes to opt-out, she or he will have to go through the application process.

32. An opt-out digital meter cannot be replaced with a smart meter, unless requested by the owner of the property in writing.

Seattle City Light will provide customers who opt out with a non-communicating, digital meter until they close the account or request an advanced meter so long as they abide by the terms of the electrical service agreement. Instances of power theft, failure to provide access to the meter and other circumstances could lead to the cancellation of an opt out. If an account with an opt out meter is closed, City Light will replace that meter with an advanced meter for the next customer.

33. An individual owner of a condo in a condo building can opt out if they own their meter base. If the condo owner does not have personal ownership of the meter base serving their unit, he or she can only opt out if all units within

the building chooses to opt out as well.

The owner of a condo unit can apply to opt-out, regardless of the ownership of a meter base.

34. SCL will not allow a mix of smart meters and digital meters on rental buildings. An apartment renter cannot ask for an **opt-out meter** unless the apartment building owner has requested that the entire building be opted out.

The owner of a multi-family rental building with five or more units cannot opt out individual units. Additionally, such an owner cannot opt out the metering for common areas and lighting, which is billed as a commercial service.

35. Once a multifamily property, where the property owner(s) has acquired **opt-out status**, the building can only be converted to smart meters, if all condo owners or the apartment building owner agree.

Incorrect. With condos, the decision to opt out or not belongs to the owner of the individual unit.

36. If a renter wants to **opt out**, he or she must get written permission from the owner of the building to do so. Similarly, a renter cannot convert the building or unit to a smart meter unless they get written permission from the owner. *This depends on the circumstances. If the owner of the property requests the opt out, he or she will be*

responsible for the fees and the tenant does not have the choice of an advanced meter.

If the tenant requests the opt out (and receives the owner's permission), the tenant will be responsible for the fees. In this instance, the tenant would be able to decide whether to continue using the opt-out meter or switch to an advanced meter and stop paying the opt-out fees.

37. SCL has information on ownership of all residential units, so will inform both renters and home owner of the upcoming meter switch out, minimum 4 weeks prior to the switch out. *Notifications about the program have already been delivered to all customers through the Light Reading newsletter that accompanies bills. Individual installation notices will be sent to customers by mail about six weeks before our installers are in a customer's neighborhood. This will be followed by a post card about two weeks before installation and a phone call one to two days before installation. Tenants must get approval from the property owner if they wish to opt out.*
38. In addition, SCL will notify all city light customers of the planned smart meter installation a minimum of 4 weeks prior to the switch out of meters on the property. *See 37*
39. Seattle City light will include the **opt-out form** in the letter notifying homeowners and renters of upcoming smart meter installation, thereby accommodating individuals w. limited access to

computers/printers or with limited computer skills.

There will be information about opt-out in the letter, including a website where you can download an application and a telephone number. If a customer calls us and requests an opt-out form, we will provide one.

SCL will not use the commonly used industry and online search term “smart meter**” in any of their literature or communications. Synonyms such as Standard Meter or Advanced Meter will be used to describe smart meters. **2-way communicating wireless meter = standard meter = advanced meter = smart meter.***

SCOTT THOMSEN

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