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RE - AVA TARIFF REQUEST 200013 BY AVISTA CORP. DTD 1-6-2020

MARK JOHNSON EXEC. DIRECTOR AND SECRETARY
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Dear Mr. Johnson

AVISTA AMI METER (gas and electric) and OTHER ISSUES of SAFETY

Avista has filed a tariff request for those customers who opt-out of use of smart meters. Avista proposes charges of \$5 to \$15 per month for manual reading of electromechanical meters, either gas or electric meters or meters that are not communicating although Avista's request is to receive a monthly fee. Avista has not charged fees for reading meters in the past so a monthly charge is highly unusual.

PROBLEMS, COMPLAINTS, or ISSUES¹

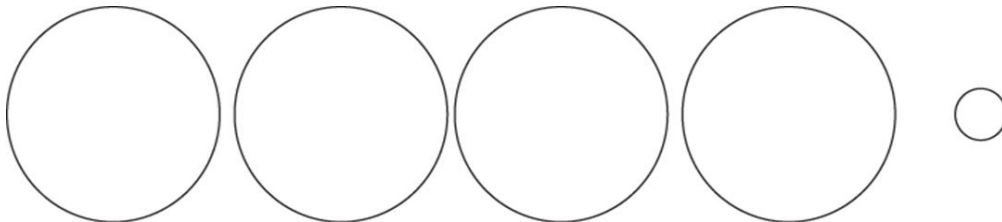
The problems with Smart Meters are several. Communicating meters emit radio frequency with some emissions continuous which is a danger to persons, especially children, who may sleep in a room near, though on the opposite side of the wall and as near as two feet from the communicating meter. Others that have communicating meters comment that the meter has caused an increase in customer's use of electricity, with reason being that the "cost of communication in electricity use" is added to customer usage. In Ontario about 36,000 smart meters were removed because meters were unable to communicate long distances or through trees². This elicits the question as to "how much electricity" is required for meter communications and what is the level of danger. Another comment in Ontario is that Smart Meters "cost \$3 to \$4 per month, about \$1 billion added to power bills over 6 years, just in additional electricity charges"³. The World Health Organization has classified the radiation emitted from smart meters as a Class 2B carcinogen, on par with DDT and lead, says one report. Further there does not seem to be a federal mandate to require smart meters, so why must customers be compelled to accept them or accept new terms if the meters are unacceptable to customers? A report⁴ found that RF radiation 3 feet from a communicating smart meter is 40 times (average) higher than received by a person standing near a microwave oven and 400 times higher than RF radiation received from a cell phone body or Wi-Fi router. Those who install smart meters claim there is a savings, but what is the savings, and how is the savings quantified? "Smart Meters are designed to provide government with detailed information on your energy use, your movements in your home, the way you use your personal private time, and even how many people are in your home at any given time (American Policy Center)". American Policy Center has produced a comprehensive special report entitled "Sustainable Development and the Control of Energy (The growing battle over Smart Meters)." This report details the real reasons behind the government's enforcement of the Smart Meters, the health and privacy violations, and the political agenda behind it all⁵. Several reports show that meters have sparked fires at residences in Oregon and Ontario that led to the Canadian province to begin removing 100,000 meters⁶.

Sask Power, after insistence for their removal by the Ministry of Energy, Sask power announced it would remove all smart meters after 10 fires in that province and reinstalling the old analog (electromechanical) meters that would cost another \$50 million. The event prompted PGE to replace 70,000 meters in Oregon. In the same report the American Academy of Environmental Medicine cautioned against the installing of Smart Meters due to harmful effects to health of humans as the academy said that “multiple studies correlate RF exposure from meters with diseases as cancer, neurological disease, immune disorders, immune dysfunction, and electromagnetic sensitivity”. The report also said that smart meters are a violation of the Fourth Amendment on an unimaginable scale, and meters provide avenues for hackers and governments to spy on citizens. More information on the growing threat of smart meters can be found at this source⁷.

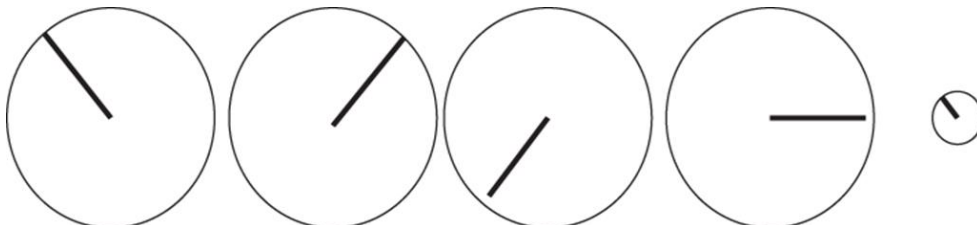
RECOMMENDATIONS

1. Here is my recommendation for persons who choose to opt-out of smart meters, to apply to both natural gas or electric meters. This recommendation should apply during and after the pilot period. Avista should not charge a fee for meter reading for both natural gas or electric meters to customers who are seniors, shut-in, indigent customers, handicapped or are low-income customers. For other customers, customers who are able to self-read meters, can chose to do so and communicate the reading to Avista by telephone, mail, or internet on a quarterly basis. Transmitting of readings from customers via internet to Avista would appear without cost and free Avista of all meter reading contractors and result in a savings of more than \$1.1 million annually according to Avista’s stated cost (\$64.57 each customer x 4 per year x 4,390 customers = \$1,133,849). There should be no fee if customers choose to self-read or those who qualify for other categories listed above.

Another method, but more costly than the method just described, and used in the past when a customer of Lincoln Electric Cooperative is the use of pre-printed post cards to communicate meter readings from customer to utility. The post card was pre-addressed and pre-printed with dials identical to the number of dials on the meter. Customers would be mailed several post cards annually or enough for the year. The unmarked card looks like this:



Each month (or quarter) the customer self-reads the meter to indicate the location of the needle on each for the five dials by looking at the meter, by marking on the post card using a pencil (this was a time before ball point pens). The customer marks card that might appear like this.....



The post card was then mailed to the utility. Lincoln Electric Co-op. also paid the postage of 2 cents.

Avista (1-6-2020) says that manual reading of meter would cost \$64.57/visit, a value which seems *outrageously extraordinary*, but with this amount reduced to \$21.52/visit if a fee is approved by UTC. It seems Avista should seek out a cheaper alternative. Avista is likely already reducing costs from smart metering customers (non-opt customers may number over 400,000 customers) that do not opt-out and these savings can easily exceed minimal costs to enable Avista to cover costs of opt-out customers (whose number it estimates at near 4,390). My RECOMMENDATION would be far less expensive than Avista's proposal and should be aggressively sought. An obvious question is: Why is it that Avista has not offered any of these options previously?

2. My second recommendation is that opt-out customers who later, after installation of smart meters is complete, but later decide to have smart meters removed after they learn of the many problems associated with them for which they were not pre-advised by Avista is that these customers not be charged a fee for their removal for the reasons listed above (PROBLEMS, COMPLAINTS, or ISSUES).

3. My third recommendation applies to the many issues listed in PROBLEMS, COMPLAINTS, or ISSUES. Avista must provide evidence to customers, who use Smart Meters either communicating type or not....

- that meters are not intrusive,
- that meters do not transmit radiation that is dangerous to health or other rise,
- that meters are installed by Avista free customer of all risk that might arise from meter,
- that meters do not add cost to customers' billings due to extra electricity required,
- that meter data transmitted cannot be obtained by outside parties,
- that smart meter data cannot be provided or sold to outside parties,
- that meters are secure from *cyber* crime,
- that Avista warrants and guarantees all of these statements, and
- Avista should advise customers how customers can monitor meters and learn about or read radiation levels at customer's smart meters and how radiation can be reduced, if it exists, at customer locations.

¹ Articles cited can be provided on request

² <http://nationalpost.com/news/canada/astonishing-hydro-one-pulling-plug-on-36000-rural-smart-meters-after-years-of-complaints?>

³ 1-27-2005 Ontario Energy Board

⁴ www.committeetobridgethegap.com

⁵ This special report is available free at <http://americanpolicy.org/smart-meters-report/>.

⁶ Alex Newman <https://www.thenewamerican.com/tech/energy/item/18904-in-u-s-and-canada-smart-meter-fires-spark-alarm>

⁷ The Growing Threat of Smart Meters <https://www.thenewamerican.com/reviews/opinion/item/15422-the-growing-threat-of-smart-meters>