

TO: Washington State Utility & Transportation Commission (UTC)

FROM: Safe Utility Meters Alliance – Northwest (SUMA-NW)

RE: Rulemaking to modify existing consumer protection and meter rules to include Advanced Metering Infrastructure DOCKET U-180525

This is in response to notification to comment released on December 21, 2018.

This organization has already submitted comments to this docket. This letter is to emphasize our unaddressed concerns and to address new request for comments.

1. UTC is the oversight body in Washington State regarding safety and fairness. **AMI metering is NOT SAFE, RELIABLE, or FAIR.** From the UTC website these goals are clearly stated:

"Our Mission is to protect the people of Washington by ensuring that investor-owned utility and transportation services are safe, available, reliable and fairly priced.

Washington State law requires that utility and transportation rates must be reasonable to customers, giving regulated companies a chance to cover legitimate costs and earn a fair profit, so they can stay in business. What is fair to the company, and at the same time fair to the people and businesses it serves, is what the commission must decide many times over. Cases are heard in a formal, legal setting, with the commission hearing evidence from all sides before issuing a decision.

For most of our state's history, private utilities and carriers providing public services usually have been monopolies. If they had been left unregulated, without the restraints of the free-market system, they would have had unchecked power over the state's most essential services."

2. **There is NO convincing evidence that AMI metering is SAFE.** UTC is relying on outdated information on wireless communication safety. The Federal Communication Commission (FCC) is NOT a reliable source for safety information regarding pulsed electromagnetic radiation. The FCC has been compromised since before 1996. The 1996 Telecommunications Act was written by the telecommunications industry to protect their interests and obstruct the public's ability to reject harmful technology. The for-profit corporations have long ago monopolized the industry, usurped public interest, and written the laws to the detriment of society. The utility industry – the global corporations that dictate technology – are also a monopoly, and are stealthily moving into the extremely valuable data market. It is the job of the State of Washington UTC to protect the public interest in this matter, but it appears that none of the commissioners are cynical enough about the inanimate, global corporations' insatiable drive for monopoly and profit.

Analog meters must be an opt-out option.

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3. **There is NO convincing proof that AMI metering is RELIABLE.** There is a fire risk! Perhaps we should wait to see the investigation conclusions of the catastrophic California fires of 2018? How did the AMI metering help or aggravate the conditions in PG&E territory?

Accuracy? There is evidence that AMI metering is not more accurate than the perfected technology of the analog meter. Even if the IOUs are able to produce data supporting their claim, the source of that data is dubious in our corporate controlled environment. Further, what avenue does the individual customer have to independently verify, audit or appeal the utility's billing claim?

4. **The only FAIR pricing is FREE OPT-OUT for any residential or small business customer.** Customers of electricity want electricity; NOT surveillance, NOT detailed usage reports. Those who don't want to participate should not be punished with additional fees. Small businesses like doctor's offices and other places of healing (massage parlors, meditation centers, etc.) are especially vulnerable to the electromagnetic interference from the AMI meters.

It is NOT FAIR to allow only owners to opt out. This policy denies the right of utility customers who rent to opt out. Over 50% of residents in the Puget Sound area are renters.

It is NOT FAIR to allow only single family residents to opt out. Apartment and condominium residents should be allowed to collectively opt out for their buildings, regardless of number of units.

It is NOT FAIR to deny net-metering prosumers to opt out. There must be an option available for prosumers of electricity to opt out.

5. **Collecting data, aggregate or otherwise, beyond what is needed to determine billing is excessive and a breach of privacy.** How we use electricity inside the privacy of our own homes is no one's business but our own. The opt-out meters also collect the same data just do not transmit it directly via wireless connection multiple times per day.
6. **Lack of objection by the public is NOT a sign of agreement; it is a lack of information.** The inanimate, global corporations LIE. There are NO incentives for corporations to improve quality of life or act in any way in service to the public good. Their existence is for one purpose only – make profit.

SUMA-NW knows that all this information will fall on deaf ears and blind eyes. We are the informed public, a small but growing population. We will continue to participate and raise questions. The future solution is a wired solution with individual gateway control of data. A strong case is made for municipal fiber networks and gateway data control in the white paper [Re-Inventing Wires](#) by the *National Institute for Science, Law & Public Policy*.

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