

To: UTC Commissioners of Washington
Comments @ utc.wa.gov

Re: Smart Meters

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Smart Meter Info from research:

*In an Nov. 2018 article in Utility Dive , the Federal Energy Regulatory Commission shows the rate of AMI or AMR (Smart Meter) deployment may be slowing. Two AMI proposals were rejected by state regulators in Kentucky and Massachusetts arguing that they are not cost effective. The savings the smart meters generate do not justify the cost. For example, LG&E has 1.3 million customers and would cost \$350 million to actuate the installation plan.

*Privacy concerns are growing because of the amount and type of data the devices can collect. The United States Court of Appeals for the Seventh Circuit concluded that

“readings from smart meters constitute a ‘warrantless search.’” The Court stated that the Smart Meter data ‘reveals information about the happenings inside a home.’ This technology is called “power disaggregators” which means intended to determine which of your appliances are using the most electricity, as well as which devices are used more frequently than others. San Diego Gas & Electric Company disclosed the data of over 4000 of its Smart Meter customers.

Because of the ongoing development of this technology, the Court spoke of the serious privacy implications possible with the Smart Meters. Having asked Avista what specific product they planned to use, no reply was given. Judging from a picture in their video, there was the name of Itron on the boxes. Assuming that is the case, Itron’s website “heralded the joining of Itron with Landis+Gyr for ‘Product Integration Projects’ such as the ‘Data Unification and Synchronization System,’” which connects the communication technology of Landis with the systems analysis of Itron. Why would another entity need the Avista Data from its customers?

*” According to a senior assistant to the attorney general for public utilities in Illinois, Susan Satter, “The report shows zero statistically different result in usage (of Smart Meters) compared to business as usual.” Yet consider the

cost and the benefit to the customers. Particularly, interesting is the article: Why 50 million smart meters still haven't fixed America's energy habits. The article states “behavioral research suggests that technologies alone don't necessarily change what we do, how we act, or the habits we form.” This science study suggests that there needs to be a real time connection between use and actual cost. An appropriate example is the gas pump where the price of the purchase is immediately given.

*And if the issue is savings, a survey of Toronto Hydro customers shows 80 percent of homeowners with smart meters reported price increases on their bills. This is not what is promised at the smart grid introductions.

* There is also the problem of cybersecurity. The U.S. Department of Energy Inspector General Gregory H. Friedman, “The initial weaknesses had not always been fully addressed and did not include a number of security practices commonly recommended for federal government and industry systems.” The problem of hackers getting into the grid is real according to the experts. Another article suggests that the meters are not UL certified which is required for every other American industry product.

*A recurrent problem in article after article is the fires and explosions that have resulted from the Smart Meters.

Factually, Pennsylvania (PECO Energy) had to replace 1.6 million residential and commercial meters because of arcing and spiking.

In 2016, MET Labs wrote, "In the past, design flaws in smart meter units have been known to cause serious fire hazard and spotty performance. "

An insurance claims adjustor, Norm Lambe, contends the utility companies are tampering with the evidence by immediately removing smart meters when there is a fire if the cause is determined to be a smart meter issue.

Near Stockton, CA, dozens of smart meters exploded and caught fire after an electrical surge cut power to about 5800 homes.

In White City, Canada, the 10th smart meter fire occurred. These fires have varied in size from some just melting, to others that charred the siding on a home.

In Reno and Sparks, Nevada, nine fires have occurred that city investigators say are linked to the smart meters. The fire chief said meter fires are particularly concerning because they start on the outside of the house and won't be picked up by indoor smoke detectors.

Another fact, in Ontario, Canada, 5,400 meters had to be removed due to a risk of fire.

Presenting this research, I am asking the UTC Commissioners to adjudicate with the customer in mind.

My primary questions are:

- 1) In case of fire or explosion from the meters, will Avista pay for the repair and damages to the homes?
- 2) In opting out of the smart meter program, the customer must pay an added \$5 a month to “cover a reader charge.” Avista has in the past installed mechanisms that can pick up meter readings from a hand-held device at a distance or from a moving vehicle. Not every entity has an “opting out” monthly fee.
- 3) This costly device seems extremely intrusive with benefit to the company, but with no statistically proven real benefit to the customer. How can its device and installation costs be justified?

Please, remember that Avista is the only choice for thousands of customers. The meters are being installed without informed consent or public input, without full disclosure of how they work, or what they can do with the personal data they collect. And, Yes, I read their website which told me what they wanted the customer to hear.

Thank you for considering these comments.

