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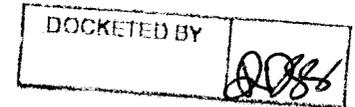
P.O. Box 1045 Bullhead City, Arizona 86430

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AZ CORP COMMISSION
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Arizona Corporation Commission
DOCKETED

SEP 14 2011



September 14, 2011

The Honorable Gary Pierce, Chairman
and Members of the Commission
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Re: Mohave Does Not Use Smart Meters
Docket No.: E-00000C-11-0328

Dear Mr. Chairman and Members of the Commission:

On behalf of Mohave Electric Cooperative ("Mohave"), as its General Counsel, we want to clarify before the Commission and the Staff of the Commission the fact that the Commission's inquiry appears to be an inquiry concerning "smart-meters" and the technology associated with "smart-meters."

We want, on behalf of Mohave, to make it absolutely clear that Mohave Electric Cooperative does not use "smart-meters" but uses what the Utility Division Staff of the Commission refers to as a "dumb" and hard-wired meters which only aggregate the usage of a consumer-member of electricity and transmits the usage via hard-wire back to the Cooperative. Mohave meters and the associated meter reading system are not intended to, and are not capable of, looking past the meter and controlling or looking into the home.

Mohave wishes to make it clear to the Commissioners and to the Utility Division Staff that the hard-wired aggregating meter emits no wireless Radio Frequencies ("RF" or "radio waves"), and certainly less EMF and RF than the current "old-style" meters presently installed on customer premises. The "old" meters that very few customers want to keep emit RF when they send data and emit more EMF than the new meters Mohave is installing.

Mohave Electric Cooperative has had only one (1) complaint/inquiry concerning the replacement of the Mohave-owned meter and that inquiry was responded to and the customer-member informed and advised that the new "dumb" meter did not "invade privacy" and was not able to emit as much "frequency" or "EMF" as the current meter that was established at the customer-member premises.

Mohave believes that choice can be embraced, but the consequences of the choice must be borne by the customer seeking that choice. Socialization of costs does not send the correct price signal for such choice and penalizes those that embrace the change to automation and Smart Grid operations. Smart Grid operations and systems seek efficiencies,

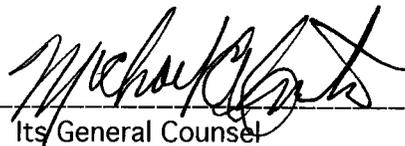
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enhanced reliability, and costs savings as well as automation and enhanced data to create new programs and services for customers.

In conclusion, to allow a form of "opt-out" opportunity for members of Mohave Electric Cooperative will disrupt the fiber-optic hard-wired system of installing "dumb" aggregating meters and disrupt the planning and efficiency of Mohave Electric Cooperative as it attempts to better understand "total customer-usage" of each of its members. Socialization of opt-out costs is a subsidy by other members to those who elect meters with higher ranges of RF and EMF and is counterproductive.

Very truly yours,

MOHAVE ELECTRIC COOPERATIVE, INC.

By: 
Its General Counsel

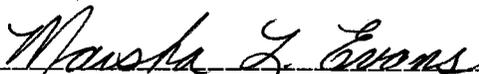
MAC/sdc

cc: Board of Directors, Mohave Electric Cooperative
Chief Executive Officer

PROOF OF AND CERTIFICATE OF MAILING

I hereby certify that on this 14th day of September 2011, I caused the foregoing document to be served on the Arizona Corporation Commission by delivering the original and thirteen (13) copies of the above to:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007



CGSUS:COOPERATIVES:MEC and Affiliates:MOHAVE Electric:ACC Smart Metering:Letters:091311 Final Dumb Meter Notice to ACC.doc