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Arizona Corporation Commission
Docket Control
1200 W. Washington St.
Phoenix, AZ 85007

Smart Meter docket #E-00000C-11-0328

To Whom It May Concern:

This filing for the Smart Meter docket #E-00000C-11-0328 contains an original filing plus 13 copies and is being filed on behalf of the Safer Utilities Network.

Included in this filing is a comment from the Safer Utilities Network concerning the proposed opt-out for the wireless meter and its effect on the small utilities with PLC meters.

Sincerely,

K. Bryan Goodman
LoronaMead, PLC
Attorneys for Safer Utilities Network

Arizona Corporation Commission

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

Docket No. E-00000C-11-0328 Smart Meters

An opt-out is not an undue burden on small utilities with PLC meters

We are pleased that the Commission intends to provide an opt-out for customers who would otherwise be exposed to a wireless meter. However, with the current draft of the Guidelines, customers with PLC meters will get no relief from unwanted electromagnetic radiation.

It appears that the barrier to including PLC meters in the opt-out is a perceived undue burden by those utilities who are already using PLC technology.

At the March 2012 workshop, one representative of a rural utility considered it unfeasible to hire someone to drive around to read the few scattered meters provided to those requesting an opt-out. Such a scenario would be costly, but it is also totally unnecessary. There are better alternatives.

Many utilities allow their customers to make equal payments throughout the year, based on the expected average electrical consumption. The difference is then settled up after the year. The utility would not need a monthly reading for such a scheme.

It is common for older houses in the Eastern States to have the electrical meter placed inside the basement. Reading such a meter involves access to the home and is thus cumbersome, so such meters are commonly read once a year. Such customers also make equal monthly payments and settle up after the annual meter reading.

People in some rural areas have for decades self-reported their electrical consumption by filling out and mailing pre-printed postcards.

Those are existing procedures which are already in use. There are other possibilities such as the customer reporting the consumption using telephone menus, similar to those used for access to bank accounts.

There are thus several options available for an opt-out program, which do not cause an undue burden upon a utility.

A failure to provide such a reasonable accommodation to people with electrical hypersensitivity could result in undue hardship, including forcing the person to have to move to a PLC-free area. There are already documented cases where this has occurred.

Submitted on behalf of
Safer Utilities Network
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