

E-00000C-11-0328

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UTILITY COMPLAINT FORM

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Investigator: Scott Friedson

Phone: 2013 JAN 31 P 2:11

Fax:

Priority: Respond Within Five Days

ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

Opinion No. 2013 - 108099

Date: 1/28/2013

Complaint Description: 01H Billing - Smart Meter  
N/A Not Applicable

Complaint By: Patricia Ferre  
First: Patricia Last: Ferre

Account Name: Patricia Ferre

Home:

Street:

Work:

City:

CBR:

State: AZ Zip: 85541

is: E-Mail

Utility Company: Arizona Public Service Company

Division: Electric

Contact Name: For assignment

Contact Phone:

Nature of Complaint:

1/28/13  
From: Patricia Ferre [mailto:  
Sent: Friday, January 25, 2013 12:20 PM  
To: Utilities Div - Mailbox  
Subject: Docket # E-00000C-11-0328

Arizona Corporation Commission  
DOCKETED

JAN 31 2013

DOCKETED BY [Signature]

Docket Control,

Please post the following request for information document on eDocket.

Thank you,

Patricia Ferre

Request for Information

Dear Commissioners and Mr. Olea,

As a concerned citizens, it is responsible for us to ask for the answers to the excellent questions, Judge Yip-Kikugawa asked of the investor-owned utilities (IOUs) concerning 'smart meter' opt- out proposals. If you have answers to these questions for each of your IOUs, please post them as soon as possible on ACC Docket # E-00000C-11-0328, so the public can view the answers for their individual electric utilities.

If you have not already asked these questions of the IOUs you regulate, please ask APS, and all of the electrical utilities you regulate, to answer the following questions asked by CPUS Judge Amy C. Yip-Kikugawa. Please post the results in a timely manner, before your commission rules on Smart/automated meters and mesh network grids and the so called, 'opt-out' program. The public needs to know this information from our own Corporation Commission representatives.

# ARIZONA CORPORATION COMMISSION

## UTILITY COMPLAINT FORM

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Sincerely, Patricia Ferre

Judge Questions Utilities on 'Smart Meters'  
<http://eon3emfblog.net/?p=3687>

The following ruling was posted 10/18/2011 by California Public Utilities Commission (CPUC) Administrative Law Judge Amy C. Yip-Kikugawa in the proceeding concerning 'smart meter' opt-out proposals. They are questions all responsible officials and concerned citizens should be asking. The PDF can be downloaded here.

### ADMINISTRATIVE LAW JUDGE'S RULING SEEKING CLARIFICATION

This Administrative Law Judge's Ruling (Ruling) seeks clarification from Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE) and Southern California Gas Company (SoCalGas)

(collectively, the investor-owned utilities or IOUs) concerning the frequency and duration of radio frequency (RF) emissions from wireless smart meters.<sup>1</sup> This clarification shall be filed by November 1, 2011.

On September 14, 2011, I held a combined workshop to consider alternatives for customers who wish to opt-out of a wireless

smart meter. Representatives from the IOUs and the smart meter manufacturers were present to discuss the technological feasibility and costs of the various alternatives. During the workshop, there were various comments concerning the frequency and duration of the transmissions from the wireless smart meters. According to some parties, the wireless smart meters transmit data in short bursts throughout the day, with each burst lasting a few milliseconds. These parties state that, on average, the cumulative amount of time for the transmission would be 45 seconds a day. Other parties, however, state that while the transmission burst may only last a millisecond, the frequency of the transmission occurs so often that the transmission should be considered constant. I want to make sure I fully understand this issue.

Consequently, I am asking the IOUs to provide further clarification concerning the frequency and duration of the transmissions from the wireless meters and the associated RF emissions. PG&E, SDG&E, SCE and SoCalGas shall, therefore, respond to the following questions:

1. What is an average duration (in seconds) that a residential smart meter transmits in a 24 hour period?

A. How is this average computed or measured?

2. How many times in total (average and maximum) is a smart meter scheduled to transmit during a 24-hour period?

A. How many of those times (average and maximum) are to transmit electric usage information?

B. How many of those times (average and maximum) are for other purposes? What are those other purposes?

Please specify number of times (average and maximum) by type/category of transmission.

3. Under what scenarios does a meter transmit outside of the daily schedule, i.e., unscheduled transmission such as on-demand read, tamper/theft alert, last gasp, firmware upgrade etc.?

4. Typically, how much of the communication between the

customer's meter and the utility is unscheduled vs. scheduled?

5. Are there any other factors that go into determining duration and/or frequency of meter transmissions (e.g., if a meter can't access the network when it's trying to send data, type of a meter etc.)? If yes, please identify these factors.

6. What is the amount of RF emission at the source when a meter is transmitting data (instantaneous maximum peak level, averaged over 30 minutes)?

7. Does the amount of RF emission vary depending on duration of transmission/volume of data being sent? For example, are RF emissions higher when there is a larger volume of data to be transmitted?

8. Are there any other factors that impact the amount of RF emissions? If so, please identify the factor(s) and its

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impact on RF emissions.

9. Is there RF emission when the meter is not transmitting? If yes, what is the amount of RF emission?

10. Is there a difference in the amount of RF emissions for a wireless smart meter with the radio off and a smart meter with the radio out? If yes, what is that difference and how is it calculated?

11. Is there a difference in the amount of RF emissions for a wireless smart meter with the radio off and an analog meter? If yes, what is that difference and how is it calculated?

As part of their responses to the questions above, the IOUs shall identify the individual who prepared the response to each question. The IOUs shall file their responses to the questions listed above by November 1, 2011.

IT IS RULED that by November 1, 2011, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Company, Southern California Edison Company, and Southern California Gas Company shall file a response to the questions concerning radio frequency emissions listed in this Ruling. Dated October 18, 2011, at San Francisco, California.

/s/ AMY C. YIP-KIKUGAWA Amy C. Yip-Kikugawa Administrative Law Judge

\*End of Complaint\*

**Utilities' Response:**

**Investigator's Comments and Disposition:**

Comments entered for the record and filed in docket No. E-00000C-11-0328. CLOSED.

\*End of Comments\*

**Date Completed: 1/28/2013**

**Opinion No. 2013 - 108099**

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