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August 5, 2013

ORP COMMISSION DOCKET CONTROL

Arizona Corporation Commission (ACC) **Docket Control Center** 1200 West Washington Street Phoenix, Arizona 85007

Re: Docket # E-00000C-11-0328

Commissioners,

Arizona Corporation Commission DOCKETED

AU6 - 5 2013

DOCKETED BY

The "smart" meter boundoggle continues to be exposed, this time in Germany.

After commissioning a feasibility study by "Big Four" accounting firm Ernst & Young, Germany's Economy Ministry has proclaimed the European Union's proposal for 80% of homes to be "smart" metered by 2020 as "inadvisable" since installation costs would be greater than energy saved. [Bloomberg News, "Germany Rejects EU Smart-Meter Recommendations on Cost Concerns", http://www.businessweek.com/news/2013-08-01/germany-rejects-eu-smart-meter-recommendations-on-cost-concerns]

This echoes the findings of three states' Attorneys General which I have brought to your attention several times in the past but which you have chosen to ignore, to the detriment of the Arizona ratepayers you were elected to serve.

- Connecticut A.G.: "...the costs associated with the full deployment of AMI ["smart"] meters are huge and cannot be justified by energy savings achieved.
- Illinois A.G.: "The utilities have shown no evidence of billions of dollars in benefits to consumers from these new meters, but they have shown they know how to profit."
- Michigan A.G.: "A net economic benefit to electric utility ratepayers from ... smart meter programs has yet to be established."

German ratepayers are fortunate to have a Economic Ministry sensible enough to

do the independent feasibility study that for ages I have been urging you to perform on behalf of Arizona ratepayers.

As a real-life example of what happens when regulators such as yourselves don't do their homework, I'll remind you that Central Maine Power (CMP) is now being audited by Maine's Public Utility Commission (PUC). CMP promised \$363 million in savings from "smart" meters but in just three years CMP came begging for an 8% rate increase because the \$363 million turned into a \$99 million cost — and all because Maine's PUC did no independent feasibility study beforehand and believed utility lies instead.

Wake up, ACC! "Smart" meters are a toxic boondoggle that violate health, privacy and property.

Sincerely,

Warren Woodward

Cc: Governor Jan Brewer, Attorney General Tom Horne