



0000151531

E00000C-11-0328

Jessica D. Perry

From: Ibis Alliance <ibisalliance@gmail.com>
Sent: Wednesday, February 26, 2014 3:06 PM
To: RBurns-Web; Stump-Web; Burns-Web; Pierce-Web; BitterSmith-Web
Cc: sedonacitycouncil@sedonaaz.gov; RAdams@sedonaaz.gov; BLitrell@sedonaaz.gov; CouncilorMcIlroy@sedonaaz.gov; mward@sedonaaz.gov; mdinunzio@sedonaaz.gov; CouncilorMartinez@sedonaaz.gov; CouncilorWilliamson@sedonaaz.gov; web.bos.district1@co.yavapai.az.us; web.bos.district2@co.yavapai.az.us; web.bos.district3@co.yavapai.az.us; lkelly_45@msn.com; cfraulob@azruco.gov; MGoimarac@SedonaAZ.gov
Subject: ACC Docket Submission

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Sent to Chairman/Commissioners

Arizona Corporation Commission
DOCKETED
 MAR 04 2014

DOCKETED BY 

ORIGINAL

From: Ms. Tina P. Choate

#217

2370 W. Hwy. 89A, Suite #11

Sedona, AZ 86336

Dear Commissioners,

Please submit this letter to Docket E00000C-11-0328 and E01345A-13-0069

There is no reason why the Commission should continue to allow the utilities to continue installation of AMI meters when ratepayers do not want them due to their concerns about the cost and that benefits are accruing only to the utilities. Considering the serious health impacts, privacy and security risks, it's hard to justify how any so-called benefits can outweigh the costs. The cost of healthcare will sky rock from the installation of microwave emitting AMI meters which the World Health Organization classified as a Class 2B Carcinogen in May, 2011. Even the largest Massachusetts utility, NSTAR, recently blasted AMI "smart" meters as "irrational" and a "security risk".

RECEIVED
 2014 MAR -4 A 9:55
 ARIZONA CORPORATION COMMISSION
 DOCKET CONTROL

Where is the cost/benefit analysis prior to allowing the utilities to start installation of "smart" meters? As ratepayers (e.g., consumers) we should not have to bear the burden of the Commission erroneously allowing the utilities to install these devices.

What does it tell us if the Commission does not follow its own laws? The following excerpts are taken from the Docket No. E-00000A-06-0038 Open Meeting June 24-25, 2007
<http://images.cc.state.az.us/scripts/cgi/dwisdocket2.pl> :

"The Commission is required to consider the three purposes of PURPA in its determination of whether to adopt the Time-based Metering and Communications standard. The three purposes of PURPA are as follows:

- conservation of energy supplied by electric utilities
- optimal efficiency of electric utility facilities and resources and
- equitable rates for electric consumers.

"Both benefits and costs of AMI and time-based rates should be considered"

" Utilities should investigate their needs and those of their customers to determine if the **benefits of AMI outweigh the costs** and which AMI technology would be most appropriate to use."

The ratepayers were not consulted about this and if we were, we would have said no.

"Utilities should offer **voluntary** time-based rate schedules that can provide benefits to both customers and utilities."

If ratepayers have to opt-out in order to refuse AMI meters, then it is not voluntary. Those who are not aware of what the AMI meter is, but receive a smart meter by default, that is not

considered voluntary. Opt-in is the only voluntary choice. Since microwave radiation is equivalent to second hand smoke and since that radiation cannot be contained, only the shielded wire option should be voluntary. There is nothing voluntary about being irradiated by a mesh grid.

"However, **both the benefits and the cost** of Advanced Metering and Communications should be considered **before requiring full-scale implementation.**"

Presented below is a summary of key points made by Northeast Utilities in its filing of January 17, 2014. http://haltsmartmeters.org/wp-content/uploads/2014/01/NSTAR_R12-76-Comments-7986-POSTED01172014_HIGHLIGHTED.pdf

"There is no rational basis for ...mandated implementation of [smart meters]."
Mandating smart meters "comes without due consideration of key issues such as:

-the immense cost attached to the technology choice;

-whether customers are willing and able to pay the price of this technology choice;

-whether the functionality provided by the technology choice will be utilized by customers or is even sought by customers;

-whether the imposition of significant costs ... for this technology conflicts with other policies encouraging ... increased penetration of distributed resources [like wind and solar];

-whether investment in distribution upgrades needed to accommodate distributed energy resources [would be] a better investment of customer dollars given the relatively small incremental benefit afforded by [smart meters];

-whether other issues such as market alternatives, time-varying rates, and cyber-security should be resolved before there can be any rational determination that this technology is a good choice for customers."

"Smart" Meters Are Not a Good Choice for Consumers

"The [smart meter] technology choice is made although there is no evidence that this is a good

choice for customers. Conversely, there is ample evidence that this technology choice will be unduly costly for customers and that the objectives of grid modernization are achievable with technologies and strategies that rank substantially higher in terms of cost-effectiveness. For customers who will pay the price of this system, there is no rational basis for this technology choice."

"There is no evidence that customers are willing to pay for the limited incremental functionality gained through implementation of [smart meters]. In fact, there is evidence to the contrary. For example, industry studies show that only 46 percent of customers are aware of the concept of 'smart metering,' and of that percentage, 33 percent associate smart metering with complaints of meter inaccuracy, higher customer bills, invasion of privacy and health concerns. Many customers have a deep aversion to technology that links them to the 'grid' in a way that they perceive as an invasion of their privacy and/or detrimental to their health."

Smart Meter Costs Can Not Be Justified

"There is no cost justification that can support the implementation of [smart meters]. As identified by Northeast Utilities, ... [a smart meter] roll-out is problematic due to the extraordinary cost associated with, at best, a modest increase in functionality."

"Northeast Utilities estimates, conservatively, that the price tag for a [smart meter] rollout, including the recovery of existing investment on the Companies' books would likely approach, and possibly exceed, \$1 billion over the course of ... implementation – all of which is to be borne by customers who may or may not be interested in interacting with the distribution system at the level implicated by [smart meter] technology."

Smart Meters Are Not an Appropriate Technology Platform for Grid Modernization

Mandating smart meters "creates an intractable obstacle to grid modernization. The mandate precludes [utilities] from designing and implementing grid modernization plans that are best suited to customers and that mitigate the cost that customers will bear for progress."

"An Advanced Metering System is not a 'basic technology platform' for grid modernization and is not needed to realize 'all of the benefits of grid modernization.'"

"Meters do not reduce the number of outages; metering systems are not the only option for optimizing demand or reducing system and customer costs; and metering systems are not necessary to integrate distributed resources [such as wind or solar] or to improve workforce and asset management. Therefore, it is not correct that advanced metering functionality is a 'basic technology platform' that must be in place before all of the benefits of grid modernization can be fully realized."

"Accordingly, not only is there a flaw in the ... premise that an advanced metering system is a 'basic technology platform' for grid modernization, but also the implementation of a costly, advanced metering system is at odds with policies designed to promote the growth of distributed energy resources."

"Immense, near-term investments in [smart meters] should not be mandated without (1) methodical, valid analysis of the associated costs and benefits; and (2) the development of a plan to solve the detrimental impact of cost-shifting driven by the pervasive installation of distributed energy

resources.”

“It is also premature to assume that [smart meters] can provide for large-scale conservation voltage reduction (‘CVR’).”

Cyber-Security Issues Prevent Development of a Suitable Implementation Plan

“Without resolution of the [issues related to] cyber-security, it is not possible ... to develop a suitable [smart meter implementation plan]. [Smart meters] introduce a brand new portal into the Companies’ information systems, significantly increasing the cyber-security risk. Currently, the only mandatory standard for electric distribution company cyber-security is the North American Electric Reliability Corporation Critical Infrastructure Protection (‘NERCCIP’), which applies only to bulk power systems and not to the electric distribution systems and metering infrastructure...”

Smart Meter Technology May Soon Be Rendered Obsolete

“Last, but not least, there is little confidence that the incremental benefits of moving to a [smart meter] platform will be sufficient to warrant the cost. Given that the grid modernization technology sphere is a dynamic, rapidly evolving marketplace, it is also unclear whether the incremental benefits, if any, would begin accruing to customers prior to the implemented [smart meter technology] being rendered obsolete. In any event, the cost remains unjustified by the benefits.”

Since the Arizona Corporation Commission has jurisdiction over the quality of service and the quantity of rates charged by public service utilities, there is really no reason for the Commission to allow such irresponsible actions to continue. You likewise shoulder the responsibility of protecting the health and wellbeing of the public ratepayers being directly affected by your decisions. We voted for all of you, the Commissioners to represent us and to protect us against the dictates of such a Corporate Monopoly.

Thank You for your Consideration.

Sincerely,

Tina P. Choate

CC: Sedona City Council and Mayors, Sedona City Attorney, Yavapai County Supervisors, Elizabeth Kelley, RUCO