

Beth L. Solier



From: Beth L. Solier <psolier@mac.com>
Sent: Tuesday, December 30, 2014 11:12 AM
To: Pierce-Web; Stump-Web; RBurns-Web; BitterSmid-Web; BitterSmid-Web
Cc: John LeSueur
Subject: Non-Discriminatory Opt-Out Solution for Solar Customers
Attachments: Dr Powell's Chart pg 16.pdf; ATT00001...htm

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Commissioners, Director Olea and John LeSueur,

As an intervener on Docket E-01345A-13-0069, I direct the attention of our ACC Commission, of Director Olea and of John LeSueur (who is currently acting on Director Olea's behalf), to the following information found on Docket # E-00000C-11-0328.

The Commission should continue its policy as clearly established at its August 5, 2015 staff meeting. It treated all customers with the same respect and allowed ALL ACC Commission electrical service customers the same and equal rights to not have harmful and controversial 'smart' meters.

Mr. LeSueur contacted me to explain that Director Olea and APS recently agreed that Solar Customers in Docket E-01345A-13-0069:

- Would be allowed to Opt-Out of the electrical usage meter
- Would not be allowed to Opt-Out of the solar production meter

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This plan is of course **still Discriminatory**: Solar customers are not allowed to choose freedom from harmful, unsafe and potentially lethal 'smart' AMI meters.

Northeast Non-AMI Perspective

The following Northeast Utilities presentation offers a perspective that includes non-AMI solutions that can permit us to provide a two (2) meter Opt-Out policy for solar customers. **Solar customers would then be receiving equal opportunity to be free from harmful and potentially lethal pulsed microwave technologies located on their homes.**

The Massachusetts Department of Public Utilities, in its December 23, 2013 "Investigation by the Public Utilities on its own Motion into Modernization of the Electric Grid, D.P.U. 12-76-A, has applicable statements in what it calls the "Straw Proposal."

Northeast Utilities identifies four grid-modernization objectives, which are to: reduce the effects of outages; optimize demand, including reducing system and customer costs; integrate distributed resources; and improve workforce and asset management.

"An Advance Metering System is not a 'basic technology platform' for grid modernization and is not needed to realize 'all of the benefits of grid modernization.' The Department identified four objectives for grid modernization, all of which can be achieved without the implementation of an advanced metering system. 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 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, as the Department suggests.

In fact there are non-metering technologies that the Companies have implemented or can implement in the future within a grid-modernization plan, that would tangibly advance the grid-modernization objectives set by the Department."

"Therefore, it is clear that the Companies would be able to identify and implement a suite of non-meter technologies and processes, in addition to those already implemented, in order to advance the Department's grid-modernization objectives without the implementation of an advanced metering system."

<http://images.edocket.azcc.gov/docketpdf/0000151238.pdf>

pages 4 & 5:

APPLICABLE ARIZONA LAW

The current APS proposal communicated from Director Olea's office involves Discrimination under the following Arizona statute: **40-334**

Discrimination between persons, localities or classes of service as to rates, charges, service or facilities prohibited

A. A public service corporation shall not, as to rates, charges, service, facilities or in any other respect, make or grant any preference or advantage to any person or subject any person to any prejudice or disadvantage.

B. No public service corporation shall establish or maintain any unreasonable difference as to rates, charges, service, facilities or in any other respect, either between localities or between classes of service.

C. The commission may determine any question of fact arising under this section.

Arizona Statutes ensures our Safety, Health, Comfort and Convenience: A.R.S.40-361.B and A.R.S.40-321.A.

A.R.S.40-361.B – Every public service corporation shall furnish and maintain such service, equipment and facilities as will promote the safety, health, comfort and convenience of its patrons, employees and the public, and as will be in all respects adequate, efficient and reasonable.

A.R.S.40-321.A – When the commission finds that the equipment, appliances, facilities or service of any public service corporation, or the methods of manufacture, distribution, transmission, storage or supply employed by it, are unjust, unreasonable, unsafe, improper, inadequate or insufficient, the commission shall determine what is just, reasonable, safe, proper, adequate or sufficient, and shall enforce its determination by order or regulation.

APPLICABLE Study Comparing:

No FCC Protection from Pulsed Radiation with BioInitiative Proposed Safety Limit

Dr. Powell's CHART E-01345A-13

