

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company (U 39 M)  
for Approval of Modifications to its Smart Meter Program  
and Increased Revenue Requirements to Recover the Costs  
of the Modifications.

Application 11-03-014  
(Filed March 24, 2011)

And Related Matters.

Application 11-03-015  
Application 11-07-020

**ECOLOGICAL OPTIONS NETWORK  
COMMENTS ON PROPOSED DECISIONS  
REGARDING SMARTMETER OPT-OUT PROVISIONS:**

**PROPOSED DECISION OF ALJ YIP-KIKUGAWA  
ALTERNATE PROPOSED DECISION OF PRESIDENT MICHAEL PEEVEY**

November 17, 2014

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**California Public Utilities Code § 451**

**California Constitution, Article XI, Section 7**

**PU Code 328.2(b)**

### **ECOLOGICAL OPTIONS NETWORK COMMENTS ON PROPOSED DECISION AND ALTERNATE PROPOSED DECISION ON ‘SMARTMETER’ OPT-OUT PROVISIONS**

The Ecological Options Network (EON) submits these comments on the proposed decision and alternate proposed decision as provided in Pub. Util. Code §§ 311(d) and 311(e) and in Article 14 of the Commission’s Rules of Practice and Procedure (Rules Pursuant to Rule 14.3, these comments shall not exceed [15] pages.

### **PROCEDURAL BACKGROUND**

Despite extensive and repeated appeals and hundreds of testimonies, large numbers of letters and e-mails by many members of the public making clear that the overriding motivations for public demands for no-cost opt-out options for individual households, collective housing units, businesses and communities are based on demonstrated human and biological health effects, proven safety risks, clear privacy violations, hacking vulnerability and grid security dangers, this proceeding has completely excluded all those issues and focused narrowly on the

three following concerns as specified on page 6 of the Alternate Proposed Decision:

1. “Cost and cost allocation issues associated with offering an analog opt-out option.
2. “Whether the opt-out option should be extended to allow communities and local governments to opt out on behalf of their residents.
3. “Whether the Americans with Disabilities Act or Pub. Util. Code § 453(b) limit the Commission’s ability to adopt opt-out fees for those residential customers who are required to have an analog meter for medical reasons.

“The Scoping Memo expressly excluded consideration of health and safety impacts of smart meters from this phase of the proceeding.”

Consideration of health and safety impacts were also excluded from the Smart Grid Proceeding with the excuse that they would be considered in some future phase of the Opt-Out Proceeding.<sup>1</sup>

It now appears to be the intent of both Proposed Decisions to bring the Opt-Out Proceeding to an end without ever considering any of the key motivations leading to public demands for refusing ‘smart’ meters in the first place.

Such sleight-of-hand, bait-and-switch tactics cast into serious question the legitimacy and credibility of both PDs.

### **EON PARTICIPATION**

EON has been involved in these ‘smart meter’ proceedings since the filing its Protest to PG&E’s A.11-03-014 on April 25, 2011, as well as ECOLOGICAL OPTIONS NETWORK REPLY BRIEF July 30, 2012, and OPENING BRIEF OF ECOLOGICAL OPTIONS NETWORK, January 11, 2013.

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<sup>1</sup> As cited in **CENTER FOR ELECTROSMOG PREVENTION COMMENTS ON PROPOSED DECISION** at 2: “D.13-07-024, p. 7: “On October 3, 2011, assigned Commissioner Peevey issued Scoping Memo and Ruling of the Assigned Commissioner (Scoping Memo), which set the initial scope and schedule in this proceeding. Among other things, the Scoping Memo ruled that alleged health issues raised by certain parties were under consideration in other active proceedings before the Commission, and inclusion in this proceeding would “duplicate that work.” The scoping memo in that proceeding stated on page 8 that the health issues were under consideration in the A.11-03-014 et al. opt-out proceedings.”

As we have argued before in this proceeding,

“According to the California Public Utilities Code § 451 utilities are required to furnish and maintain such ‘service, instrumentalities, equipment, and facilities . . . as are necessary to promote the safety, health, comfort, and convenience of [their] patrons, employees, and the public.’ The CPUC is required to enforce these codes. . . .

“By not taking unresolved (and as yet unconsidered) public health, safety, financial and security issues into account, utilities are violating Cal. PUC Code § 451.”<sup>2</sup>

### **TOPICS to be ADDRESSED**

EON finds it egregiously irresponsible that this Proceeding treats cost considerations and ADA compliance as its sole foci while attempting to permanently exclude all other relevant and overriding issues from ever being dealt with. We will focus our comments on the following topics:

1. The unsupported and unsupportable fundamental assumption underlying both Proposed Decisions; i.e., that “smart meter deployment is in everyone’s best interest.”
2. The reversed application of the principle that ‘who causes the problem should pay.’”
3. Exclusion of health and safety considerations from this Proceeding
4. The regulatory over-reaching by which the Proposed Decisions assert sole jurisdiction and authority over health and safety, privacy and security issues; refuse to consider them; and then attempt to preclude other relevant public agencies and bodies from exercising their constitutionally mandated responsibilities with respect to these same issues.
5. The cloud of cronyism and corruptions that now hangs over the CPUC calling into serious question the credibility, legitimacy and legality of its rulings, has now become the enveloping evaluative context for all CPUC proceedings. This fact

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<sup>2</sup> ECOLOGICAL OPTIONS NETWORK REPLY BRIEF, July 30, 2012, pp. 4-5

can no longer be excluded from the scope of this Proceeding. This proceeding has the same judge and Commissioner involved with the problematic San Bruno proceedings.

6. Finally, we will argue that the so-called ‘smart meter/smart grid’ system is not an energy/service delivery and management system at all, but in actuality a data-collection, surveillance and unlicensed two-way communication system superimposed on an aging and debilitated infrastructure and an obsolete and outmoded monopoly IOU business model, so that - as an unlicensed data-collection, surveillance and bi-directional communication system – it should be adjudicated separately within the telecommunication regulatory jurisdiction of the CPUC, thus making this entire proceeding illegitimate, illegal and void.

## **EON COMMENTS on the Proposed Decisions**

### **1. Technocratic, Ideological Belief Does Not Trump Demonstrable Fact**

Both PDs assert in identical language without justification that “It is in everyone’s interest to promote moving to smart meters.” [ALJ/AYK/dc3 – at 43; COM/MP1/sbf/dc3 – at 45 ]

This is not a statement of fact, but an expression of an ideological belief that forecloses any consideration of evidence to the contrary. Thus all rulings in this Proceeding are biased and suspect from the outset.

With that seriously misguided and unsubstantiatable belief as the starting point, rolling back the ‘smart meter’ rollout is unthinkable. It is certainly not ‘in the best interests’ of the growing numbers of electro-sensitive people made sick and forced to become ‘EMF refugees’ by the proliferation of wireless technologies, including wireless ‘smart meters.’ As EON noted in our previous filing,<sup>3</sup>

Many cases of people having to abandon their homes and workplaces ... have been reported.<sup>4</sup>

Here is one example from a ... CPUC Public Meeting in Santa Rosa, California, ALJ Yip-Kikugawa, presiding: STATEMENT OF MS. HAHN□

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<sup>3</sup> **OPENING BRIEF OF ECOLOGICAL OPTIONS NETWORK, January 11, 2013**

<sup>4</sup> See, <http://stopsmartmeters.org/>

Hello, your Honor. Thank you for the opportunity to speak today. My name is Kim Hahn. I'm a private citizen from San Raphael. My life changed completely on September 9th, 2010. Within 24 hours of the installation of a gas and an electric smart meter on my home my physical health began a rapid downward descent. Within days I was unable to sleep, to concentrate, or to eat. Within weeks I had developed a sensitivity to all things wireless. I could not tolerate proximity to cell phones, computer routers, cordless phones, digital TV or DVD players.

I was not able to stay in my home when the electricity was on nor walk through the streets of my town. A private tutor for the previous 15 years, I now could no longer visit my clients in their own homes or work with them in the libraries. My ability to earn a reasonable income became severely jeopardized.

In the early months since I began to lose town after town, I remained convinced that there were places where I could go to clear my body of radiation. My partner Bob and I drove to more sparsely populated locales hoping to find sanctuary. Smartmeters had not been deployed so much in Sonoma and Mendocino Counties, but that ended as PG&E overtook those places. It soon became apparent that there was indeed no place to run to nor to hide from the devastation of smart meters. So we hired a number of electrical professionals to help us determine to what extent our problem is responsible for my illness and whether we could remedy the problems and stay in our home. We even had lots of help from PG&E, who removed the smart meters, replaced our transformer and rebundled our cables to lessen the EMFs running on our lines.

All six professionals detected a transient running on our house wires, and all six of them were certain that it was not being generated inside my house. In short, the problem was equally present with the electricity disconnected from the power lines as it was when it was connected. The smart meters were sending pulses that travel through the air and catch a ride on whatever conducts frequency, be it cables, power lines, internal

house wiring, water, sewers, or gas pipes or houses themselves that act like antennas.... The mesh network has a life of its own.<sup>5</sup>

Who is accountable for the medical and property costs and living expenses in such tragic cases? Why should they not be factored into the total cost accounting?

Furthermore, PG&E employee, Brian Rich, testified that due to individuals opting out, PG&E had to install 33 additional data collection nodes. This adds to the microwave pollution in the areas where this is done, eliminating some of the slight benefit to the individual opting out of a single meter.<sup>6</sup>

## **2. Costs Associated with Remedying a Problems Should be addressed to Those Causing the Problem**

Another erroneous assumption and implication that underlies and permeates both PDs is that those who wish to ‘opt-out for any reason or no reason’ are standing in the way of ‘smart meter’ deployment and all-encompassing ‘mesh networks’ which are ‘in everyone’s interest,’ and therefore should pay a penalty for causing the ‘problem.’ If the principle that ‘who causes the problem should pay’ were to be justly applied, it would be the Commission which mandated the SM roll-out and the utilities that implemented it who should bear the costs, not the ratepayers and homeowners who were never consulted and are being impacted without their informed consent.

## **3. Exclusion of Health and Safety Considerations from this Proceeding**

It is both illogical and disingenuous to specifically exclude from the Proceeding consideration of health and safety, and then state - as both PDs do – that interveners have failed to provide any peer-reviewed evidence on those topics.

Identical language: Peevey APD at 62/3; Yip-Kikugawa PD at 60/61:

Parties have failed to produce evidence necessary to determine what health impacts RF and/or EMF may have on members of the public. Members of the public have told compelling stories of alleged medical problems they believe have arisen from or exacerbated the installation of wireless smart meters.<sup>222</sup> Such accounts have raised concern at this Commission and other fora regarding the potential for deleterious effects from RF and/or EMF emissions on the health of utility customers. This lack of scientifically developed evidence prevents this Commission from identifying alleged RF/EMF sensitivities as disabilities within

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<sup>5</sup> Kim Hahn, Vol. 10 RT, Santa Rosa, CA, December 20, 2012, pp. 1059-1061

<sup>6</sup> Brian Rich, Vol. 2 RT \_pg.291 lines 27, 28 to pg. 292 lines 1 to 6

the meaning of the ADA and other laws protecting the health and preventing medical discrimination. At this time, however, no party has produced scientific evidence regarding what frequency, volume of RF and/or EMF emissions may impact health at what distance from individual AMI components and collections thereof. The Federal Communications Commission is “seek[ing] comment on new proposals . . . regarding compliance with our guidelines for human exposure to RF electromagnetic fields.”<sup>223</sup> The Commission is hopeful that such analysis may provide relevant evidence regarding safe levels of RF/EMF exposure.

If admitted, evidence of human health and biological harm from chronic radio-frequency exposure from devices such as wireless ‘smart meters’ could have been plentifully supplied.

In fact, peer-reviewed, published scientific studies about the harmful effects to humans of electromagnetic are easily available on-line and in the literature.

Just enter "Electromagnetic fields risk to humans" in a search on Google Scholar <sup>7</sup> and you will find listed 63,100 citations, most of which are published scientific studies showing serious negative human health impacts from chronic exposures to low-level electromagnetic radiation – a finding which *has been known for years*.

A 1994 US Air Force report,<sup>8</sup> concluded, "Experimental evidence has shown that ***exposure to low intensity radiation can have a profound effect on biological processes***" (EON’s emphasis). In 1994, the acceptable, supposedly ‘safe’ exposure level was 50,000 milliwatts per square meter. In the years since, the maximum ‘official’ exposure limit has been significantly reduced to 10,000 milliwatts per square meter. However, it should be noted that that is still more than ***1 million times higher*** than the allowable exposure limits recommended in the 2012 BioInitiative Report,<sup>9</sup> which members of the public and some parties have repeatedly, though unsuccessfully, attempted to bring to the Commission’s attention.

A 2008 Journal of Biomedicine and Pharmacotherapy article<sup>10</sup> found that:  
Health endpoints reported to be associated with ELF and/or RF include childhood leukemia, brain tumors, genotoxic effects, neurological effects and neurodegenerative diseases, immune system deregulation, allergic and inflammatory responses, breast cancer, miscarriage and some cardiovascular effects. The BioInitiative Report concluded that a reasonable suspicion of risk exists based on clear evidence of bioeffects at environmentally relevant levels,

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[http://scholar.google.com/scholar?hl=en&q=Electromagnetic+fields+risk+to+humans&btnG=&as\\_sdt=1,4&as\\_sdtp=](http://scholar.google.com/scholar?hl=en&q=Electromagnetic+fields+risk+to+humans&btnG=&as_sdt=1,4&as_sdtp=)

<sup>8</sup> ["Radiofrequency/Microwave Radiation Biological Effects and Safety Standards: A Review"](https://electroplague.files.wordpress.com/2014/09/rf-microwave-radiation-biological-effects-rome-labs.pdf)

<https://electroplague.files.wordpress.com/2014/09/rf-microwave-radiation-biological-effects-rome-labs.pdf>

<sup>9</sup> <http://emfsafetynetwork.org/wp-content/uploads/2013/08/Biological-Effects-From-RF-Radiation-and-Implications-for-Smart-Meters-June-5-2013-2.pdf>

<sup>10</sup> ["Biological effects from electromagnetic field exposure and public exposure standards."](#)



which, with prolonged exposures may reasonably be presumed to result in health impacts.

January 1, 2011, Sage Associates, the consulting firm of a principal editor of the BioInitiative Report, Cindy Sage, issued an on-line report<sup>11</sup> which used computer modeling to document,

the range of possible smart meter RF levels that are occurring in the typical installation and operation of a single smart meter, and also multiple meters in California. It includes analysis of both two-antenna smart meters (the typical installation) and of three-antenna meters (the collector meters that relay RF signals from another 500 to 5000 homes in the area).

Tables contained in the Sage Report indicate:

RF levels from the various scenarios depicting normal installation and operation, and possible FCC violations have been determined based on both time-averaged and peak power limits (Tables 1 - 14).

Potential violations of current FCC public safety standards for smart meters and/or collector meters in the manner installed and operated in California are predicted in this Report, based on computer modeling (Tables 10 – 17)....

...Violations of FCC safety limits for uncontrolled public access are identified at distances within 6” of the meter. Exposure to the face is possible at this distance....

On May 11, 2011, a Working Group of 31 scientists from 14 countries convened by the World Health Organization’s (WHO) International Agency for Research on Cancer (IARC) issued a finding “RF is classifiable as a 2B Possible Human Carcinogen.”<sup>12</sup>

According to Robert Baan, the author of the IARC statement, “the classification 2B, possibly carcinogenic, holds for all types of radiation within the radiofrequency part of the electromagnetic spectrum, including the radiation emitted by base-station antennas, radio/TV towers, radar, Wi-Fi, smart meters, etc.”<sup>13</sup>

The American Academy of Environmental Medicine (AAEM) report, **Electromagnetic and Radiofrequency Fields Effect on Human Health**<sup>14</sup> specifically asks for:

- An immediate caution on Smart Meter installation due to potentially harmful RF exposure.
- Accommodation for health considerations regarding EMF and RF exposure, including exposure to wireless Smart Meter technology.

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<sup>11</sup> [Assessment of Radiofrequency Microwave Radiation Emissions from Smart Meters](http://sagereports.com/smart-meter-rf/)  
<http://sagereports.com/smart-meter-rf/>

<sup>12</sup> [http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208\\_E.pdf](http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208_E.pdf)

<sup>13</sup> Personal e-mail communication.

<sup>14</sup> [http://aaemonline.org/emf\\_rf\\_position.html](http://aaemonline.org/emf_rf_position.html)

- Independent studies to further understand the health effects from EMF and RF exposure.
- Recognition that electromagnetic hypersensitivity is a growing problem worldwide.
- Understanding and control of this electrical environmental bombardment for the protection of society.
- Consideration and independent research regarding the quantum effects of EMF and RF on human health.
  
- Use of safer technology, including for Smart Meters, such as hard-wiring, fiber optics or other non-harmful methods of data transmission.

Similarly, there is ample documented evidence from around the country and, indeed, from around the world, that ‘smart meters’ have caused fires and damaged equipment in customers’ homes.<sup>15</sup>

If the Commission disallows consideration of the evidence on these issues in this Proceeding, it cannot validly opine that parties have not presented such evidence.

Additionally, rulings in both the Opt-Out Proceeding and the Smart Grid Proceeding, while disallowing admission of health and safety evidence, have implied that such evidence will be examined in some subsequent phase or proceeding. Yet now it appears that the Commission has no intention of ever dealing with health and safety issues in abdication of its responsibilities and violation of its mandate under California Public Utility Code 451.

PU Code 328.2(b) clearly states: “No customer should have to pay separate fees for utilizing services that protect public or customer safety.”

Furthermore such a decision clearly violates the Commission’s own Safety Policy adopted on July 10, 2014, which states in part that Commissioners:

“...certify through signature on Proposed Decisions that the findings, conclusions, and actions laid out in proceedings can meet the CPUC’s overarching goals and expectations, and assure that each vote on proceedings, resolutions, ratemaking, or other decisions of the CPUC addresses the CPUC’s overarching goals and expectations regarding safety and resiliency.”

#### **4. CPUC Regulatory Over-Reaching in Relation to Other Mandated Public Agencies**

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<sup>15</sup> see, for example: <http://emfsafetynetwork.org/smart-meters/smart-meter-fires-and-explosions/>  
<http://stopsmartmeters.org/2014/07/07/another-fire-landis-gyr-smart-meter-causes-apt-blaze/>  
<http://stopsmartmeters.org/2013/06/21/when-smart-meters-kill-the-story-of-larry-nikkel-details-emerge-of-vacaville-ca-smart-meter-fire-death/>

At the same time that these PDs abdicate the CPUC mandate and violate its own rules, they attempt to preclude other constitutionally mandated agencies and bodies from fulfilling THEIR responsibilities to protect public health and safety.

For example: [ Yip-Kikugawa PD at 49]

...the utilities note that the Commission retains exclusive authority over regulation of public utility services and rates, and may not delegate this authority to local governments or communities.

[ Peevey APD at 54/55]

As a practical matter, a key threshold question raised by the Scoping Memo<sup>192</sup> is whether the Commission may properly delegate its authority to select gas and electric metering equipment choice to local authorities. Article XII, Section 3 of the California Constitution grants the California Legislature “exclusive control over the PUC’s regulation of public utilities.” Section 8 of Article XII of the California Constitution states “a city, county or other public body may not regulate matters over which the Legislature grants regulatory power to the Commission.” Thus, the Commission holds the power to regulate public utilities, and this authority may not be delegated to another entity or public agency without statutory authorization. As a result of this finding, the Commission need not address the remainder of the comments.

California Law’s Public Utilities Code (PUC)<sup>16</sup> specifically defines the authorities shared by the CPUC and municipalities:

**Article 1. General Provisions and Definitions**

**Section 2901.**

Any municipal corporation may retain or surrender to the commission the powers of control vested in it to supervise and regulate the relationship between any one or more classes of public utilities, and their present or prospective customers, consumers, or patrons, and, if it has retained such powers over any class of public utilities, may thereafter surrender such powers to the commission.

**Section 2902.**

This chapter shall not be construed to authorize any municipal corporation to surrender to the commission its powers of control to supervise and regulate the relationship between a public utility and the general public in matters affecting the health, convenience, and safety of the general public, including matters such as the use and repair of public streets by any public utility, the location of the poles, wires, mains, or conduits of any public utility, on, under, or above any public streets, and the speed of common carriers operating within the limits of the municipal corporation.

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<sup>16</sup> [http://ca.regstoday.com/law/puc/ca.regstoday.com/laws/puc/cala-puc\\_DIVISION1\\_PART3\\_CHAPTER1.aspx](http://ca.regstoday.com/law/puc/ca.regstoday.com/laws/puc/cala-puc_DIVISION1_PART3_CHAPTER1.aspx)

## **5. Questions of Corruption, Cronyism, Credibility and Legitimacy Now Define the Overarching Context of this Proceeding**

Documentation of alleged illicit and illegal back-channel, ex parte, communications and relationships between CPUC commissioners and staff and PG&E officials with regard to the San Bruno gas disaster is extensive and growing, with both Federal and State investigations on-going. EON has assembled 40 pages of investigative reporting on this matter. Numerous examples can be seen on-line.<sup>17</sup>

The legitimate suspicion of a too cozy relationship between the ‘regulator’ and its regulatees now taints all proceedings and decisions of the CPUC. (Such suspicions are not allayed by the example of former presidential assistant Carol Brown resigning as a result of her involvement in the scandal, then returning to CPUC employment reincarnated as an ALJ.)

Both authors of these PDs were extensively involved in the San Bruno case. Indeed, that involvement is cited as the reason for the long postponement of action on the Opt-Out Proceeding.

It is not therefore unwarranted to raise the question of whether or not both ALJ Yip-Kikugawa and President Peevey should be expected to recuse themselves from opining in this Proceeding.

## **6. The ‘Smart Grid’ as a Bi-Directional, Unlicensed Private Communication and Data Extraction System with a Metering Component Lies Outside the Regulatory Purview of the CPUC**

Both PDs discuss [ at 20 – paragraph 4.2.2 ] that deployment of Advanced Metering Infrastructure (AMI) requires the “Acquisition and Installation of Communication Network Equipment,” explaining that

‘Mesh smart meter networks rely on each smart meter to not only capture and disseminate its own data, but to also serve as a relay for other smart meters. Removing smart meters through the opt-out program may materially impact the mesh, such that “as a result of the Opt-Out Program, ...[utilities] will require additional communicating devices, such as range extenders or cell relays...” to mitigate opt-out program impacts on the SmartConnect network.’

Despite the clear implication – as EON has argued previously in this Proceeding – that installation of work-arounds to ‘mitigate’ opt-out holes in the mesh network with other wireless transmission devices will mean that households that elect to opt-out will nevertheless still be subjected to RF emissions from the neighborhood mesh network surrounding them, this discussion also demonstrates that **what is being superimposed on an existing distribution grid for electricity, gas and/or water is what amounts to an**

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<http://www.sfgate.com/search/?action=search&channel=bayarea&inlineLink=1&searchindex=gsa&query=%22California+Public+Utilities+Commission%22>

**unlicensed, privately owned two-way communication system designed for data extraction that also contains a meter.**

As a comment published on MichiganStopMeters.com<sup>18</sup> clearly explains:

An actual mechanical meter operates on voltage and only measures energy usage. A genuine meter does not do estimated virtual readings, snapshots, totalization, is not in lag to actual real time usage, does not measure reactive power (which is not usage) nor convert it into usage, does not co-opt and control a privately owned service panel or circuit box, does not override the private owner's whole house master switch by using a remotely operated RD switch, does not use uninsulated whole house wiring system owned by the private property owner to operate the energy distribution grid while billing private owners to run the system in exchange for wireless removal of their privacy and monitoring of all their activities via frequency graphing .

In addition, a real electromechanical meter is UL-approved and insurable – which 'smart meters' are not. The fact that this computerized device has four prongs does not make it inherently electrically compatible with a privately owned UL-approved analogue meter socket or meter base – which probably contributes to the demonstrated fire dangers already cited.

Why then is it referred to as a "meter" rather than a network portal, rather than as what the industry itself calls it, a 'network management and communications node,' one of billions of such nodes in a massive unlicensed data extraction system which lends itself to both corporate collection and marketing of private information and government surveillance?

Each 'smart meter' is a network node, it is a bi-directional transmitter, it is an antenna, – but it is not a just a 'meter.'

These observations call into question the CPUC's jurisdictional authority to regulate such a system.

**Conclusions and Recommendations**

Both Proposed Decisions fail to fulfill the Commission's statutory mandate and violate its own rule to protect public health and safety.

As Ronald Powell, PhD explains in a letter sent to the Indiana Office of Utility Consumer Counselor regarding consideration of smart meters for Indiana,

Wireless 'smart meters' threaten health, privacy, personal and fire safety, and cyber security of the delivery of electrical power, without any convincing evidence of cost savings to the public commensurate with their own considerable cost.

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<sup>18</sup> <http://michiganstopsmartmeters.com/2014/10/29/is-there-a-silver-bullet-for-smart-meters-in-michigan/#comment-28229>

They bury communities in millions to billions of bursts of radiofrequency/microwave radiation, night and day, every day of the year, over which the public has no control.

That radiation passes through homes and into every resident, from unborn children, to toddlers, to teenagers, to adults, to senior citizens, including the healthy, the chronically ill, and the disabled alike.

Wireless 'smart meters' operate like compact cell towers, attached to, or inside, each home, by relaying radiofrequency/microwave signals from one meter to another.

The human and biological health effects, property damage risks, privacy violation and cyber-security threats of wireless 'smart meters' and the wireless 'smart grid' are documented and real. Ignoring, dismissing or denying them will not make them go away. Nor will such responses prevent the inevitable pandemic of RF-related illnesses, the tsunami of negative individual and societal impacts, or the resulting deluge of medical costs, litigations and prosecutions.

By refusing to acknowledge, confront and attempt to mitigate these clear and present dangers now, regulators, manufacturers and utilities are but 'kicking the can down the road' and opening themselves and society to widespread tragic and costly repercussions in the future.

Having already delayed this long, the Commission should further delay any final decisions until it has seriously considered all these issues in adjudicatory public hearings.

Dated: November 17, 2014

Respectfully Submitted,

/s/ Mary Beth Brangan

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Mary Beth Brangan, Co-Director

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