



Complaint/Protest to the Application of Pacific Gas and Electric Company for A Smart Grid Deployment Plan U 39 E, A.11-06-029; and related Applications. California Edison Co., A. 11-07-001, and San Diego Gas & Electric Co., A. 11-07-001

FILED

TO THE HONORABLE CALIFORNIA PUBLIC UTILITIES COMMISSION: 08-04-11
08:00 AM

Pursuant to the Commission's Rules of Practice and Procedure; Rule 2.6 governing Protests, Responses, and Replies and Rule 4.1(b), Complaints; *We* the undersigned ratepayers of PG&E wish to protest/complain about the Smart Grid Deployment plans currently being implemented statewide [prior to public review of those plans] with CPUC's authorization.

The grounds for the complaint/protest are as follows:

The three CPUC regulated utilities PG&E, SCE, and SDG&E have deployed wireless SmartMeters through out their service territories [i.e., they have begun implementing their Smart Grid Deployment Plan(s)] without first conducting environmental review [including a health risk assessment or providing alternatives to the plans] as is required under the California Environmental Quality Act (CEQA). The CPUC approvals violated federal civil rights protections under color of state law in violation of County Ordinances.

The Board of Supervisors of Santa Cruz County approved an ordinance prohibiting SmartMeter installations. The cities of Capitola and Watsonville have similar laws. These laws were adopted to protect the health and safety of the public. The Constitution of the state of California guarantees to every property owner the inalienable right to defend and protect his or her property against any incursion that might adversely affect safety and health. Because Smartmeters have been shown to adversely impact the safety, well-being, and health of some people, any suspicion on the part of a property owner that it might have long or short term adverse affects would be sufficient cause to refuse installation, under the Constitution. Indeed, the adverse affects on utility customers from Smartmeters over the last two years (since the original authorization) have been so widespread, any such suspicion must be considered justified. Constitutional property protections therefore would require, in the face of this experience, that installation of a Smartmeter be accompanied by property owner consent and permission. In other words, the entire Smartmeter project would have to be based on an opt-in procedure.

In light of this constitutional argument, every Smartmeter now installed without the express permission and consent of the property owner becomes prima facie evidence of trespass (the perpetrator discoverable in the installation records of PG&E and Wellington Energy etc.), as well as of unconstitutional violations on the part of PG&E, SCE, and SDG&E. It also becomes evidence of the CPUC having overstepped its authority (and being thus liable for remedies to the people of California).

The printed names, signatures, and business or residence addresses of the protesting /complaining ratepayers are as follows:

- | | Name | Address | Signature |
|----|-----------------|--|-----------------|
| 1. | Nancy Repetski | 505 Glenwood Court Scotts Valley, Ca 95066 | Nancy Repetski |
| 2. | Tom Roberson | 235 Cayuga Street, Santa Cruz, Calif 95062 | Tom Roberson |
| 3. | D Burke | " " " " " " " " | DBurke |
| 4. | Cecile Mills | 307 Vega Road Royal Oaks CA 95076 | Cecile Mills |
| 5. | Laura Gladstone | 111 Chilvestone St. Santa Cruz 95062 | Laura Gladstone |

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- | Name | Address | Signature |
|--------------------------|--|----------------------|
| 6. RICHARD CROFOOT | 833 FRONT ST, S.C. | R. Crofoot |
| 7. Cynthia Kasirecky | 220 Atlantic Ave SC | Cynthia Kasirecky |
| 8. Bruce Tanner | 220 Atlantic Ave Santa Cruz | Bruce Tanner |
| 9. Margaret Haas | 115 Via Hermosa, SC | Margaret Haas |
| 10. Clint Jeffers | 866 Nobel Dr, SC | Clint Jeffers |
| 11. Ramon E. Andre | 310 Kingsbury Dr. Apt 20, Ca. | Ramon E. Andre |
| 12. Ramon E. Andre | 310 Kingsbury Dr. Apt 20, Ca. | Ramon E. Andre |
| 13. Ledi Cornille | 5043 Winton Ave SC Ca 95065 | Ledi Cornille |
| 14. NICOLETTA CARBONNICK | 187 Travethan Av Santa Cruz | Nicoletta Carbonnick |
| 15. Candice Stein | 620 Cyroger Santa Cruz CA 95065 | Candice Stein |
| 16. Jason Rabsey | 271 Navigator Dr. Scotts Valley CA 95066 | Jason Rabsey |
| 17. Kirk Krauss | 1000 Wilderfield Rd. Los Gatos CA 95033 | Kirk Krauss |
| 18. Elizabeth Buckley | 218 Highland Santa Cruz, CA 95060 | Elizabeth Buckley |
| 19. JOHN LANTIERO | 133 Myrtle St Ca 95060 | John Lantiero |
| 20. Susan Wallace | 124 Rosee Dr. Aptos, CA. 95003 | Susan Wallace |
| 21. KB Bullock | 1213 Ocean St. Santa Cruz, Ca. 95060 | KB Bullock |
| 22. M. MARCHESSAULT | 744 BOULEVARD DA. FELTON CA. 95018 | M. Marchessault |
| 23. Glen Chase | glenchase@aol.com SC | Glen Chase |
| 24. Tammie Donnelly | emfhelp@yahoo.com | Tammie Donnelly |
| 25. Karen Nevris | 4320 Clares St #G Capitola 95010 | Karen Nevris |
| 26. Peter Han | 6001 (Coff) St. Santa Cruz | Peter Han |
| 27. Christine Schneider | 2153 E. Cliff Dr Santa Cruz CA 95060 | Christine Schneider |

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Name	Address	Signature
28. Taha Lesser	2153 East Cliff Dr, Santa Cruz 95062	Taha Lesser
29. JOHN DOANE	221 VISTA PRINCE CT SANTA CRUZ, CA 95062	John Doane
30. Andrew Schneider	523 Broadway Apt. A Santa Cruz, CA 95060	Andrew Schneider
31. Deborah Bigelow	334 Stanford Ave Santa Cruz CA 95062	Deborah Bigelow
32. Steven Barisoff	339 STANFORD AVE. SANTA CRUZ, CA 95062	Steven Barisoff
33. Margaret M Smith	564 Santa Margarita Dr. Aptos, CA 95003	Margaret M Smith
34. RAJAT ESBAT	P.O. BOX 67124 SCOTTS VALLEY CA 95067	Rajat Esbat
35. BETH ANN LABANDA	741 REDWOOD DR SANTA CRUZ, CA 95060	Beth Ann Labanda
36. F. JOHN LABANDA	741 REDWOOD DRIVE SANTA CRUZ CA 95060	F. John Labanda
37. LORAYN TIFFANY	508 CAYUGA ST. SANTA CRUZ, CA 95062	Lorayn Tiffany
38. NOREEN M SCUTCHEN	6744 Hwy 9 #1 Felton	Noreen M Scutchen
39. Scott EERKES	1031-A 3 RD ST S.C., CA 95060	Scott Eerkes
40. Erica Papeli	1031 A 3 rd St Santa Cruz CA 95060	Erica Papeli
41. Susie Karanag	1031 A 3 rd St SC 95060	Susie Karanag
42. Ellie Saif	2717 Redwood Dr. APTS 95003	Ellie Saif
43. Biblis Family (3)	111 Parrell St SC 95062	Biblis Family
44. Miriam Fishman	108 Loda Ct S.C. 95060	Miriam Fishman
45. Susan Gipe	652 McKenzie Ave Watsonville, CA 95076	Susan Gipe
46. Adriana Karta	2002 West Cliff Dr, Santa Cruz CA 95060	Adriana Karta
47. Louise Gipe	2302 West Cliff Dr, Santa Cruz	Louise Gipe
48. Donna Hanson	2385 Sunflower Circle Aptos 95065	Donna Hanson
49. Judith Rogers	2500 Soguel Dr, Apt. A23, Santa Cruz	Judith Rogers

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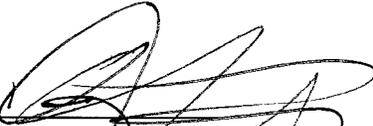
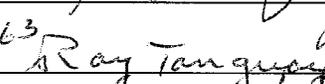
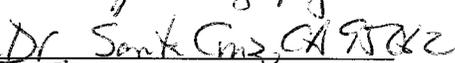
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The printed names, signatures, and business or residence addresses of the protesting /complaining ratepayers are as follows:

	Name	Address	Signature
1.	CARMEN NUZUM	P.O. Box 806 Capitola CA 95008	
2.	Judy L Moore	P.O. Box 1504 Soquel, CA 95075	
3.	RAY TANGUAY	P.O. BOX 2231 slung 95063	
4.	Cath Gundersen	1141 E. Cliff Dr Santa Cruz, CA 95062	
5.	Alexis Jensen	SARATOGA, CA	

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Name	Address	Signature
6. <u>Margorie Sawarkelorn</u>	<u>612 Washington St, Apt. A Santa Cruz 95060</u>	<u>Margorie Sawarkelorn</u>
7. <u>Susan North</u>	<u>2630 Portola Dr Santa Cruz 95062</u>	<u>Susan North</u>
8. <u>John P. Giese</u>	<u>5610 Scott Valley Dr #270 SO CA 95064</u>	
9. <u>Lowell Webb</u>	<u>5381 Old San Jose Rd Soquel</u>	Lowell Webb
10. <u>Lynda Marin</u>	<u>2830 Smith Grade, SC, CA 95060</u>	<u>Lynda Marin</u>
11. <u>Georgia Sears</u>	<u>80 Blackburn St #217 S.C., CA 95060</u>	<u>Georgia Sears</u>
12. <u>CHRISTINE DAMEN</u>	<u>227 ANCHORAGE AVE S.C. 95062</u>	<u>Christine Damen</u>
13. <u>MARTHA D. BAUM</u>	<u>520 COLUMBIA ST. - SC 95060</u>	<u>Martha D. Baum</u>
14. <u>HARVEY A. BAUM</u>	<u>520 Columbia St. SANTA Cruz CA 95060</u>	<u>Harvey A. Baum</u>
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