



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

06-15-12
04:59 PM

Application of Pacific Gas and Electric Company for approval of Modifications to its SmartMeter™ Program and Increased Revenue Requirements to Recover the Costs of the Modifications (U39M).	Application 11-03-014 (Filed March 24, 2011)
And Related Matters.	Application 11-03-015 Application 11-07-020

**SOUTHERN CALIFORNIANS FOR WIRED SOLUTIONS TO SMART METERS
SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP**

Southern Californians for Wired Solutions to Smart Meters (SCWSSM) is organized as an unincorporated non-profit association pursuant to the laws of the State of California. SCWSSM Bylaws include the following item 2:

2. **PURPOSES.** Southern Californians For Wired Solutions to Smart Meters (SCWSSM) is organized for the following purposes:
 - (1) to represent, lobby and advocate all legal rights and the interests of residential and commercial customers and/or citizens affected adversely by wireless technologies implemented by electrical, gas, telephone and water corporations and agencies in California;
 - (2) to provide citizens, legislature and government agencies with medical research and scientific information and education on radiation/radio frequency illness and adverse biological effects of wireless technologies.
 - (3) to promote, advocate and seek legal remedies for (including but not limited to) federal and state violations of disability rights, civil rights, property rights, personal rights, consumer rights resulting from administrative agency's decisions and resulting from implementation and operation of wireless technologies by the electric, gas, telephone and water corporations and agencies in California.

Other parties to this proceeding represent ratepayers with similar interests. These groups include the California Public Utilities Commission's Division of Ratepayer Advocates and the Center for Electrosmog Prevention. SCWSSM is different from these groups because SCWSSM is advocating for applying the Americans with Disabilities Act and other state and federal laws pertaining to the disabled to the considerations of opt out fees and charges. SCWSSM believes that ratepayers with disability and medical conditions adversely affected by smart meters cannot be charged for opting to use an analog meter.

SCWSSM's cost of participating in CPUC proceedings, which is estimated to be \$45,000, substantially outweighs the benefit to the individual members it represents. SCWSSM believes that the benefits to the ratepayers substantially outweigh the costs of SCWSSM's participation in this proceeding because of the potential liabilities caused by disregarding the requirements of the Americans with Disabilities Act.

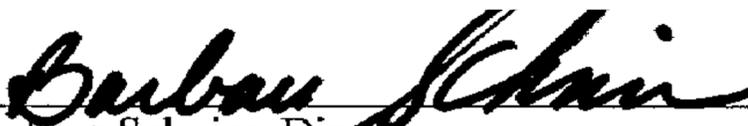
The members are residential customers whose individual interests in this proceeding are approximately \$100 in potential annual rate changes. Accordingly, these economic interests are small relative to the costs of participation. It is unlikely SCWSSM members will see financial benefits that exceed its costs of intervention.

VERIFICATION

I, Barbara Schnier, am Director and Founder of the Southern Californians for Wired Solutions for Smart Meters, (SCWSSM) and am authorized to make this verification on its behalf. The statements in the document "**SOUTHERN CALIFORNIANS FOR WIRED SOLUTIONS TO SMART METERS SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP**" filed on June 15, 2012, are true based on my own knowledge, except for those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **June 15, 2012**, at Apple Valley, California.

By  _____
Barbara Schnier, Director
Southern Californians For Wired Solutions to Smart Meters
(SCWSSM)

14575 Flathead Road,
Apple Valley, California 92307