



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

07-30-12
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

**CENTER FOR ELECTROSMOG PREVENTION RESPONSE SUPPORTING
MOTION TO ACCEPT DECLARATIONS
IN EMF SAFETY NETWORK'S BRIEF**

Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure, the Center for Electromog Prevention (CEP) submits this response supporting the "Motion to Accept Declarations in EMF Safety Network's Brief" submitted on July 14, 2012. EMF Safety Network submitted a legal brief in response to "Assigned Commissioner's Ruling Amending Scope of Proceeding to Add a Second Phase" dated June 8, 2012.

CEP would like to go on record as supporting EMF Safety Networks' "Motion to Accept Declarations in EMF Safety Network's Brief." CEP asserts that Declarations are necessarily illustrative of numerous real-life situations pertaining to the Americans with Disabilities Act (ADA) and/or Public Utilities Code 453, whereby people wish to opt-out for reasons associated with medical conditions and/or disabilities. As such, CEP asserts that the said Declarations are, for vital illustrative purposes, entirely appropriate to refer to and include in EMF Safety Network's brief. Further, CEP asserts that the CPUC is the entity which asked the questions pertaining to the opt-out fees, medical conditions and disabilities and the ADA and Public Utilities Code 453 in the first place. Parties must be free to answer the questions, especially in a manner that illustrates real-life scenarios. *To do any less would be to ask the question and appear to subvert the answers.* Therefore, CEP strongly supports EMF Safety

Network's Motion to Accept Declarations in their brief and encourages the CPUC to accept them.

The CPUC must ensure safe utility service. The rejection of the declarations is detrimental to customer safety in California. CEP asks that the full opening brief filed by Network on July 16, 2012 be accepted into the record because they are relevant to the questions asked by Commissioner Peevey.

Respectfully submitted,

_____/S/_____

July 27, 2012

MARTIN HOMECEC
Attorney for Center for Electrosmog Prevention
P. O. Box 4471
Davis, CA 95617
Tel.: (530) 867-1850
Fax: (530) 686-3968
E-mail: martinhomecec@gmail.com