BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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In the Matter of the Application of San Diego Gas & Electric Company (U 902 E) for Adoption of its Smart Grid Deployment Plan	A.11-06-006 (Filed June 6, 2011)
And Related Matters.	A. 11-06-029 A. 11-07-001

CENTER FOR ELECTROSMOG PREVENTION'S COMMENTS ON THE CPUC STAFF REPORT ON WORKSHOPS FOR SMART GRID DEPLOYMENT

The Center for Electrosmog Prevention (CEP) has the following comments on the report issued by the California Public Utilities Commission (CPUC) staff on March 1, 2012. Pursuant to the assigned Administrative Law Judge (ALJ) ruling dated November 22, 2011, and subsequent e-mails from the CPUC staff, these comments are timely.

The report is intended to allow the CPUC to develop expectations of how the Smart Customer/Utility/Market can advance California energy goals. SB 17, codified and chaptered into California Public Utilities (PU) Code § 8360-69, states, "**It is the policy of the state to modernize the state's electrical transmission and distribution system to maintain safe, reliable, efficient, and secure electrical service**…" CEP believes that these requirements have not been met, and the CPUC has not required adequate proof of meeting these criteria. On the contrary, the CPUC appears to be accepting unsubstantiated claims, without supportive data and is ignoring all evidence to the contrary, including widespread reports of harm to health, smart meter fires, massive power outages, and the dire warnings of independent experts and scientists related to safety, reliability, efficiency, and security.

CPUC has a statutory obligation to oversee the utilities' operations for consumer protection and safety. California PU Code section 330 (f) and (g), section 334, and section 364. Section 364 requires the CPUC to adopt inspection, maintenance, repair, and replacement standards for the distribution systems of investor-owned electric utilities.

The CPUC Staff recommends[1] approving the Plans with no revisions, claiming that *"the utilities have complied with the requirements of SB 17 and the requirements set forth by the Commission",* when this is not the case. CEP recommends:

1) Not accepting the Plans, and

2) Holding public hearings to determine whether the evidence demonstrates that the utility companies have complied with all the requirements.

CEP BELIEVES THAT THE SB17 REQUIREMENTS HAVE NOT BEEN MET, AND THE CPUC HAS NOT REQUIRED PROOF THAT THEY HAVE BEEN MET

SAFETY

SB 17's safety requirements have not been met, related to severe physical and health impacts, fires, interference with appliances and other wireless devices. The number of reports of harmful effects occurring following installation of smart meters is overwhelming.

The American Association of Environmental Physicians, in January, 2012, noted the health complaints and extreme risks, noting Federal Communications Commission (FCC) guidelines are irrelevant, obsolete and not protective of the public health, calling for a moratorium on the installation of smart meters.[2] The Santa Cruz County Department of Public Health issued a report on January 24, 2012, entitled "Health Risks Associated With Smart Meters"[3] concluding, with regards to Safety:

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[1] Smart Grid Workshop Report, page 13.

[2] AAEM Smart Meter Position Statement http://aaemonline.org/images/CaliforniaPublicUtilitiesCommission.pdf (Jan. 2012) "Given the widespread, chronic, and essentially inescapable ELF/RF exposure of everyone living near a "smart meter", Given the widespread, chronic, and essentially inescapable ELF/RF exposure of everyone living near a "smart meter", **the Board of the American Academy of Environmental Medicine finds it unacceptable from a public health standpoint to implement this technology until these serious medical concerns are resolved. We consider a moratorium on installation of wireless "smart meters" to be an issue of the highest importance.**

[3] Santa Cruz CA County Health Department Health Effects of Smart Meters Report, pages 9-18 (Jan. 24, 2012) http://emfsafetynetwork.org/wp-content/uploads/2012/01/Santa-Cruz-Public-Health-Official-Smart-Meter-report.pdf

"Meeting the current FCC guidelines only assures that one should not have heat damage from SmartMeter exposure. It says nothing about safety from the risk of many chronic diseases that the public is most concerned about such as cancer, miscarriage, birth defects, semen quality, autoimmune diseases, etc. Therefore, when it comes to nonthermal effects of RF, FCC guidelines are irrelevant and cannot be used for any claims of SmartMeter safety unless heat damage is involved (Li, 2011). There are no current, relevant public safety standards for pulsed RF involving chronic exposure of the public, nor of sensitive populations, nor of people with metal and medical implants that can be affected both by localized heating and by electromagnetic interference (EMI) for medical wireless implanted devices....

In summary, there is no scientific data to determine if there is a safe RF exposure level regarding its non-thermal effects. The question for governmental agencies is that given the uncertainty of safety, the evidence of existing and potential harm, should we err on the side of safety and take the precautionary avoidance measures? *The two unique features of SmartMeter exposure are: 1) universal exposure thus far because of mandatory installation ensuring that virtually every household is exposed; 2) involuntary exposure whether one has a SmartMeter on their home or not due to the already ubiquitous saturation of installation in Santa Cruz County.* **Governmental agencies for protecting public health and safety should be much more vigilant towards involuntary environmental exposures because governmental agencies are the only defense against such involuntary exposure."** (Santa Cruz County Health Dept., 1/24/12, p. 11) [emphasis added]

To date, the public impact has been so great that **51 California municipalities have taken an extremely strong position against smart meters**, including 10 counties, 38 cities, and one Native American tribal community, in an unprecedented attempt to protect local citizens

from increased exposure to rf microwave radiation and/or harm, necessitated by the CPUC's and utilities' lack of response to harmful effects from the wireless smart grid deployment.[4]

The CPUC is not only being negligent but is ignoring complaints of direct physical assaults, inhumane acts and degradation of a large number of human beings, and/or endangerment of up to 1/12 of the citizens of the United States, the number that live in California. CPUC cannot "cherry-pick" the portions of the SB 17 statute to apply to the smart grid plans, especially ignoring the safety mandates. At the CPUC Business Voting Meeting held on February 1, 2012[5], a number of citizens have even called these "crimes against humanity"[6].

At the very least, the CPUC has a statutory obligation to oversee the utilities' operations for consumer protection and safety. California PU Code section 330 (f) and (g)[7], section 334, and section 364[8]. Section 364 requires the CPUC to adopt inspection, maintenance, repair, and replacement standards for the distribution systems of investor-owned electric utilities.

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[4] Local Governments On Board http://stopsmartmeters.org/how-you-can-stop-smart-meters/sample-letter-to-local-government/ca-local-governments-on-board/

[5] CPUC Commission Business Voting Meeting - February 1, 2012

[6] Wikipedia: **Crimes against humanity**, as defined by the Rome Statute of the International Criminal Court Explanatory Memorandum, "are particularly odious offenses in that they constitute a serious attack on human dignity or grave humiliation or a degradation of one or more human beings. They are not isolated or sporadic events, but are part either of a government policy (although the perpetrators need not identify themselves with this policy) or of a wide practice of atrocities tolerated or condoned by a government or a de facto authority. Murder; extermination; torture; rape; political, racial, or religious persecution and other inhumane acts reach the threshold of crimes against humanity only if they are part of a widespread or systematic practice. Isolated inhumane acts of this nature may constitute grave infringements of human rights, or depending on the circumstances, war crimes, but may fall short of falling into the category of crimes under discussion."[1]

[7] PUC section 330 (f) The delivery of electricity over transmission and distribution systems is currently regulated, and will continue to be regulated to ensure system safety, reliability, environmental protection, and fair access for all market participants.
(g) Reliable electric service is of utmost importance to the safety, health, and welfare of the state's citizenry and economy. It is the intent of the Legislature that electric industry restructuring should enhance the reliability of the interconnected regional transmission systems, and provide strong coordination and enforceable protocols for all users of the power grid.

[8] Public Utilities Code section **364.**

(a) The commission shall adopt inspection, maintenance, repair, and replacement standards for the distribution systems of investor-owned electric utilities no later than March 31, 1997. The standards,

CEP has stated its strong concerns regarding the safety of the highly flawed smart grid deployment plans, even as these were ordered to be implemented.

SB 17 requires that the plans be safe (and secure), which they emphatically are not, with extensive evidence available for this conclusion. Last summer, CEP took the following position in its Protest by CEP July 30, 2011 to A.11-06-006; A.11-06-029; A.11-07-001, from which we have not deviated, but rather, have expanded:

> "CEP protests the applications of San Diego Gas &Electric Company (U 902 E), Pacific Gas and Electric Company for adoption of its smart grid deployment plan (U 39 E), and application of Southern California Edison Company (U 338-E) for approval of their unsafe smart grid deployment plans utilizing a vast and complete indoor and outdoor mesh network based on constant, pulsed-radiation-emitting wireless technologies from which there is no escape; a switching mechanism and alleged incompatibility with home wiring that may also yield harmful emissions, aka "dirty electricity" and fires, for which there is no opt-out or safe remedy, except for a return to analog meters. To cause our counties, states, and nation to be dependent for our power on such a dangerous network is to invite disaster. We therefore strongly object and request a complete remedy.
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> Epidemiological evidence consisting of many thousands of complaints involving serious health effects have been received by the CPUC and activist groups demonstrating widespread harm to humans and animals following the

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which shall be performance or prescriptive standards, or both, as appropriate, for each substantial type of distribution equipment or facility, shall provide for high quality, safe and reliable service.
(b) In setting its standards, the commission shall consider: cost, local geography and weather, applicable codes, national electric industry practices, sound engineering judgment, and experience. The commission shall also adopt standards for operation, reliability, and safety during periods of emergency and disaster. The commission shall require each utility to report annually on its compliance with the standards. That report shall be made available to the public.
(c) The commission shall conduct a review to determine whether the standards prescribed in this section have been met. If the commission finds that the standards have not been met, the commission may order appropriate sanctions, including penalties in the form of rate reductions or monetary fines. The review shall be performed after every major outage. Any money collected pursuant to this subdivision shall be used to offset funding for the California Alternative Rates for Energy Program.

installation of smart meters. There is a growing body of independent scientific evidence consistent with these health complaints related to risks and/or dangers to biological beings from wireless technologies emitting pulsed/radiofrequency (RF) radiation, including humans, household pets, animals, wildlife, plants, agriculture and the environment. There are increasing warnings from scientists, researchers, experts, and world governmental bodies on the grave health and biological impacts dangers resulting from even low level exposures to RF radiation, pulsed RF radiation, and wireless networks. These risks include cancer, as RF radiation has been recently added (on May 31, 2011) to the World Health Organization's list of (2B) potential carcinogens4, after undergoing a rigorous process, taking into consideration the warnings and research of thousands of scientists."[9]

CPUC OVERSIGHT

CEP is concerned with the issues of CPUC oversight of the functioning of the Smart Customer/Utility/Market:

How will the CPUC monitor the deployed smart grid for safety, as well as the efficiency and security, and to determine whether the electrical grid is functioning as it should function, to meet the needs of Californians?

The recent problems with the natural gas pipeline infrastructure in California show that the CPUC Consumer Protection and Safety Division[10] (CPSD) has not overseen the current, traditional utility infrastructure. How will the CPUC analyze the smart grid for errors or faults? Where is the inventory of each component of the smart grid so that it can be monitored? Who will monitor them? A similar problem with the lack of records for the natural gas pipeline infrastructure is the subject of a current CPUC proceeding: Order Instituting Investigation (I.) 11-02-016[11].

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[9] Protest by CEP July 30, 2011 to A.11-06-006; A.11-06-029; A.11-07-001 (p. 3-4)
[10] http://www.cpuc.ca.gov/PUC/aboutus/Divisions/Consumer+Protection/
[11] http://docs.cpuc.ca.gov/published/proceedings/I1102016.htm

The CPSD staff report in the I.11-02-016 proceeding states that: "This review has used the "Generally Accepted Record-keeping Principles®" (GARP®)[12] and the Information Maturity Model[13] defined by ARMA International[14] as the basis of an assessment and evaluation of PG&E's records management activities." The CPSD report finds that current California utility records management activities didn't meet legal and regulatory standards in that proceeding. Yet the CPUC staff report on the smart grid doesn't address the records keeping legal and regulatory standards in this proceeding.

What changes does the CPUC need to make to ensure safe and efficient operation of the electrical grid? CEP feels that implementation of the smart grid is premature, as the technologies selected are inherently unsafe and insecure, and as such, must be rethought, with implementation halted, for the protection of the health and welfare of all citizens of the state and the United States of America. CEP feels that the CPUC has shown itself to be extremely negligent in its role as protector of customers and citizens of the state with regards to safety of the emerging smart grid.

The CPUC staff recommends that approval of Deployment Plans should be based on strict and complete compliance with the requirements of SB 17 and D.10-06-047. However, CEP notes that the CPUC is required to comply with its statutory mandate too. CEP believes that this means that the CPUC must adopt inspection, maintenance, repair, and replacement standards to maintain safety for the distribution systems of investor-owned electric utilities. This could be done by adopting a new general order or by amending an existing general order. General Orders 165, 166, and 167 appear to be the current regulations addressing these issues, but they have not been updated to address the operation of the Smart Customer/Utility/Market or the smart grid.

The addition of smart meters and supporting equipment must be addressed by the CPUC to ensure reliable operations. The current CPUC oversight consists entirely of levying fines and

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[12] www.arma.org/garp
[13] www.arma.org/garp/metrics.cfm
[14] ARMA International was previously known as Association of Records Managers and Administrators, and is the authority on managing records and information in the USA (www.arma.org)

operations orders after a malfunction occurs. This should not continue. Instead, the CPUC should issue operational and safety orders as soon as possible.

The CPSD could be the organization to enforce these regulations. The Division of Ratepayer Advocates (DRA) could be the organization to develop rules and regulations addressing the ratepayers' needs.

The CPSD's Utility Enforcement Unit investigates alleged or apparent violations of the Public Utilities Code, Commission regulations, and other California statutes involving stationary utilities.[15] The staff report on smart grid deployment should recommend changes to the CPUC organizational structure to incorporate the need for smart consumer/market/utility oversight.

RELIABILITY

The smart grid plans make it apparent that this is an experiment, that no one knows how it really should unfold, or whether it will work as planned. The plan so far has failed to produce confidence. A recent demonstration of the fragility and unreliability of the new smart grid was seen in September, 2011, when large parts of California, Arizona, and New Mexico experienced an unprecedented and poorly understood blackout that seriously impacted the safety and economy of those regions. The smart grid cannot be reliable or safe if it is insecure.

SECURITY

Reasons given for insecurity include hacking of the electrical grid which increases to the level of "easy" now that it has extensive wireless infrastructure – susceptible to the manipulation or destruction of outsiders including but not limited to internal and external terrorists and other enemies of our country, causing our state and nation to be "at risk".

EMP EVENTS PLACE THE GRID, OUR STATE, AND NATION AT GRAVE RISK

An extremely important, emerging additional source of SB 17 safety and security violations involves exposing the entire electrical grid to massive system failure due to natural or manmade EMP (Electro-Magnetic Pulse) events. It is thought, by numerous experts and scientists that this type of occurrence is likely, and could take the grid up

[15] http://www.cpuc.ca.gov/PUC/aboutus/Divisions/Consumer+Protection/

to ten years to recover, plunging the entire state and nation into chaos and a dark age that would result in the death of millions through starvation and lack of ability to heat or cool, including violence and social unrest, with destruction of civilization as we know it. "Dr. Peter Vincent Pry, former Director of the US Nuclear Strategy Forum and President of EMPact America states "... given our current state of unpreparedness, within 12 months of an EMP event, about two-thirds of the U.S. total population... would perish from starvation, disease and societal collapse."" [16]

Isaac Jamieson, PhD (investigating the effects of electromagnetic phenomena in the built environment comments, author of 'Smart Meters - Smarter Practices'), commented on the EMP risk at the Consumer Focus Meeting (UK), Feb. 23, 2012:
"The House of Commons Defense Committee report on EMP as a developing threat (extracts of which are given below) was released [recently].
As mentioned in the RRT Smart Meter report 'Smart Meters - Smarter Practices' (http://www.radiationresearch.org/index.php?option=com_content&view=article&id=173), such a large scale EMP event would cause a devastating loss of life, with Smart Meters in their current configuration being far more vulnerable to damage than traditional analogue meters. Main risk period [not] till after 2014.

Extracts from new UK Government report:
House of Commons Defence Committee (2012), Developing Threats: Electro-Magnetic Pulses (EMP), Tenth Report of Session 2010–12, Report, together with formal minutes, oral and written evidence. 96 pp.
"The National Security Strategy (NSS) published in October 2010 [identified space weather as a Tier 1 risk]."
"Written evidence from the Government suggests that a severe space weather event, with resulting damage, may occur in the next few years … with the

[16] RRT Smart Meter report 'Smart Meters - Smarter Practices, Dr. Isaac Jamieson http://www.radiationresearch.org/index.php?option=com_content&view=article& id=173

potential to cause damage to electrically conducting systems such as power grids, pipelines and signaling circuits."

"the US National Research Council estimated the wider societal and economic costs of a severe geomagnetic storm occurring today to be around $1–2 trillion"

"The risks posed by space weather are known and significant, … a severe event could potentially have serious impacts upon UK infrastructure and society more widely. It is essential that this hazard is sufficiently recognised and addressed by the Government and relevant civil bodies. (Paragraph 28)"

"We recommend that work proceed as a matter of urgency to identify how seriously a future [large EMP] … event would affect the UK infrastructure. … (Paragraph 29)."

"... It is therefore vitally important that the work of hardening UK infrastructure is begun now and carried out as a matter of urgency. (Paragraph 42)." [It is proposed by the present author that domestic meters systems should also be resilient – at present Smart Meters are far more vulnerable to such events than the analogue meters they replace – comment by present author]

"The potential effects of a [large solar EMP] … event or a high-altitude nuclear EMP weapon would have specific and potentially devastating impacts upon the electrical grid and other aspects of electronic infrastructure, …"

"It is therefore vital that the UK electrical grid is as resilient as possible to potential threats such as these."

It is important to address such matters when assessing health risks, the suitability of Smart Meter systems and the appropriateness of their proposed rollout times." (Jamieson, 2/13/12)

The above applies to the USA as well as the United Kingdom (UK). Setting up our vital power grids to be more vulnerable to EMP events and tampering by relying on wireless infrastructure and in the control of multinational private corporations is irresponsible and may even be considered by some to be an act aiding and abetting our nation's enemies.

PRIVACY – PERSONAL INFORMATION AND PLANNED ACCESS INSIDE OUR HOMES

Privacy is related to security of the citizenry and is gravely impacted by the extensive personal information gained by utilities, for profit, in a manner never-before implemented, using smart meters.

The utilities plan to share our personal electrical and energy use data with third parties. They plan to force us to pay for that. **The utilities even plan to control what goes on inside our home, referencing a line of demarcation, further intruding into our personal spaces, privacy, and rights.** The line of demarcation will be, apparently, discussed and revealed at a later date, another piece of key information being withheld from customers who are Californians that may attempt to degrade their rights as American citizens.

CEP agrees with this statement by Levitt and Glendinning:

> "**The problem: smart metering will turn every single appliance into the *equivalent of a transmitting cell phone*, and this at a time when public concern about the safety of exposure to the radiofrequency radiation (RF) of wireless technologies is on the rise.** Heads up: that's every dishwasher, microwave oven, stove, washing machine, clothes dryer, air conditioner, furnace, refrigerator, freezer, coffee maker, TV, computer, printer, and fax machine.
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> The average U.S. home has over 15 such appliances, each of which would be equipped with a transmitting antenna. While older models can be retrofitted, General Electric (GE) and other appliance manufacturers are already putting transmitters into their latest designs, and the U.S. Department of Energy (DOE) is already giving out tax credits.
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> Meanwhile, people who don't want to use such appliances won't be able to deactivate the wireless component without disabling it and voiding warranties. Citing "electricity theft," it could also be illegal to do so."
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> Yet, not one safety concern regarding the cumulative effects of 24/7 exposure to RF radiation seems to have occurred to the backers of Smart Grids. And this is despite the fact that all appliances will transmit wireless data with peak power bursts far above

current safety standards - at frequencies between 917 MHz and 3.65 GHz in the ultra-high frequency/microwave ranges of the electromagnetic spectrum, several times a minute.

And that's just the indoor part. All transmitters inside your home or office will communicate with a Smart Meter attached to the outside of each building. [1] That meter, in turn, will transmit at an even higher frequency to a central hub installed in local neighborhoods. In what are called "mesh networks," signals can also be bounced from house-meter to house-meter before reaching the final hub. So exposures will not just be from your own meter, but accumulating from possibly 100-to-500 of your neighbors' as well.

That's a hefty barrage of radiation.

Some gas, water, and electric utilities are now using such smart networks, each with its own metering system and separate exposures -- creating a multi-frequency wall of radiation that, in the history of living creatures, is unheard of.

In addition, the meters and the antennas will act as transceivers, allowing both you via mobile phone or computer -- and take note: your utility company -- to remotely control your appliances. According to Jenny Anderson and Julie Creswell writing in the New York Times, one such system in the Midwest already allows the utility to cycle furnaces and air conditioners on and off every 15 minutes, with the stated purpose to reduce peak-loads on electric grids.

On closer scrutiny, Smart Grids look like another Build-It-Now-Deal-With-The-Consequences-Later fiasco. At a time when health concerns about the safety of cell phones, antennas, and Wi-Fi hotspots are mounting around the globe, Smart Grids will require literally billions of new transmitters, each pumping "electrosmog" into the

environment -- for which there will be no mitigation, no conscientious objection, and no escape. [17]

THE PLAN PLACES CALIFORNIA BUSINESSES, ESPECIALLY SMALL BUSINESS, OUR STATE, AND NATION AT RISK OF ECONOMIC COLLAPSE

Smart grid deployment plans will be catastrophic to business in California when fully implemented, especially when Time-of-Use (TOU) rating is applied, and with a large, growing number of people becoming sick from proximity to the meters. Provisions to protect business owners have not been made and cannot adequately be made by the IOU's, as these smart grid deployment plans run counter to California business interests. The benefits are only for the IOU's, and these are financial.

It is readily predictable that both small and large business owners, many already suffering financially, and barely able to hold on economically, will find an extreme undue burden when the smart grid deployment plans are fully operational. The smart grid plans will making it impossible to conduct business due to increased costs during peak and other hours when business is conducted, because of the inability to run equipment, or heat, cool, and light buildings; and due to exposure of their workers and the public to the dangerous microwave-emitting smart meters in occupied spaces. There could be an increase in worker's compensation claims as workers are injured. There could be a reduction in customers to many businesses. Members of the public will no longer be able to conduct business in the vicinity of smart meters.

The "smart" grid is going to be more insecure, subject to failure of wireless systems that can shut off all electricity remotely, hacking (individual, domestic, or foreign terrorism), natural (weather, space weather) or manmade (terrorist attack) electro-magnetic pulse (EMP) events, and will no longer be reliable.

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[17] The Problems With Smart Grids: Dumb and Dangerous, B. Blake Levitt and Chellis Glendinning 22 March 2011, http://www.culturechange.org/cms/content/view/714/63/

EFFICIENCY

No evidence has been presented that confirms that efficiency will be accomplished through the use of a smart grid. Conjecture has been supplied, instead. Where the smart grid has been implemented elsewhere, it has not been shown to save energy and may, in fact, cause an increase in energy use. Universities are installing their own micro-grids to investigate the issues and benefits of the smart grid.[18] However, this is not the time to install an untested system throughout California. There is no assurance that the smart grid thus far installed will work to increase energy efficiency.

CONCLUSION

The smart grid deployment plans all ignore the obvious – customers are upset with getting sick following installation, and security, safety, efficiency, and privacy issues abound. At the same time, the plans describe continuation of aggressive installations of wireless smart meters and infrastructure that can endanger and degrade the freedoms and rights of all the citizens of our state.

The CPUC Staff recommends approving the Plans with no revisions, *as the utilities have complied with the requirements of SB 17 and the requirements set forth by the Commission.*

CEP believes that this is not true, SB 17's safety requirements have not been met, related to health, fires, interference with appliances and other wireless, and the nation's security (easily hacked, no plan to prevent this is possible nor made).

CPUC has a statutory obligation to oversee the utilities' operations for consumer protection and safety. California PU Code section 330 (f) and (g), section 334, and section 364. Section 364 requires the CPUC to adopt inspection, maintenance, repair, and replacement standards for the distribution systems of investor-owned electric utilities.

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[18] http://www.renewableenergymagazine.com/energias/renovables/index/pag/panorama/colleft/colright/panorama/tip/articulo/pagid/19435/botid/47/

SMALL BUSINESSES NEED TO BE INFORMED ABOUT THE CONSEQUENCES OF IMPLEMENTATION OF THE SMART GRID

The utilities' plans are not adequate because they do not explain how small businesses will be informed about impacts of the smart grid. The requirement of smart meters for all businesses is inconsistent with the opt-out offer made to residential ratepayers. Ratepayers who don't want smart meters on their residences also will not want to patronize a business that has a smart meter on its premises. Workers may be impacted through rf radiation exposures. Businesses will be harmed economically when the smart grid increases rates and grid failures occur.

Time-of-use (TOU) tariffs are expected to be required for all small businesses by November 2012, yet outreach and education programs necessary to inform businesses about these changes have not succeeded. A focus on the benefits of the smart grid program would be misleading. CPUC needs to inform businesses of what to expect, immediately, and without delay.

The smart grid deployment plans should be rejected and the program halted, without implementing TOU tariffs, and with all wireless infrastructure removed, as the plans are not **safe, reliable, efficient, or secure, placing all citizens, businesses, economy, state and nation at grave risk from multiple factors.**

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Respectfully submitted,

/S/

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