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VIA ELECTRONIC EMAIL

April 25th, 2013

British Columbia Utilities Commission
6th Floor, 900 Howe Street
Vancouver, B.C. V6Z 2N3

Attention: Erica Hamilton

I am firmly opposed to the FortisBC application for a Certificate of Public Convenience for its Advanced Metering Project for the following reasons:

HEALTH

On May 31, 2011, the International Agency for Research on Cancer (IARC) from the World Health Organization (WHO) announced the classification of radiofrequency (RF) electromagnetic fields (EMF), in the range (30 kHz to 300 GHz) of the electromagnetic spectrum, as a Group 2B possible carcinogen to humans. This determination was reached by a consensus among the scientific working group on the basis of epidemiological and experimental evidence of carcinogenicity and mechanistic and other relevant data. The RF EMF that would be emitted by the ITRON meters being proposed in FortisBC's Application for a Certificate of Public Convenience and Necessity fall into this range.

IARC Classification of Agents:

Group 1	Carcinogenic to humans
Group 2A	Probably carcinogenic to humans
Group 2B	Possibly carcinogenic to humans
Group 3	Not classifiable as to its carcinogenicity to humans
Group 4	Probably not carcinogenic to humans

Group 2B

Group 2B (*possibly carcinogenic to humans*) on the basis of epidemiological and experimental evidence of carcinogenicity and mechanistic and other relevant data

On page 218 of Fortis BC's final submission of March 28, 2013, Mr. Loski is quoted:



And, you know, with that, it's all – you know, always then have to determine the public interest as a whole. And there are instances certainly where the views of a minority of customers is, you know, in opposition to a project, which in the end is deemed to be in the public interest for the whole. And so, you know, in that -- in those types of circumstances, the minority of individuals essentially then have to live with the results of that project or that decision because they're part of the larger whole.

I believe that, far and above any other, the fundamental question deserving of the most weight in the Commission's decision to approve or reject the Fortis BC Application is how it could ever be in the "public interest as a whole" to permit the widespread deployment of a wireless technology whose RF EMF emissions are classified as a Group 2B possible carcinogen to humans by the World Health Organization. The Commission must also concern itself with whether it can in any way be morally or legally justified in forcing any citizen to "live with the results" in the event it decides in favour of the Fortis BC application.

We have seen FortisBC minimize the importance of this classification by comparing the hazards RF EMF emissions to coffee and pickled vegetables, also listed as Group 2B possible carcinogens. (p.18, *Exponent Report: Status of Research on Radiofrequency Exposure and Health in Relation to Advanced Metering Infrastructure.*) As no one has applied for permission to force feed coffee or pickled vegetables to everyone on every single day for the rest of their lives, a better example of a WHO Group 2B carcinogen to juxtapose against would be lead. It is well known that a great deal of expense and effort has gone into cleaning up industrial sources of lead from our environment with strict protocols developed to keep it out of paint, consumer products and away from children. DDT is a further example of a Group 2B carcinogen, the American ban of which is cited by scientists as the major factor in bringing back the bald eagle from near-extinction in the US. Clearly, a Group 2B classification by the WHO is not to be taken lightly and warrants very serious consideration in the formation of important public policy.

COST

I would like to endorse the analysis and conclusions regarding cost comparisons that have been laid out in RDCK Area D - Final Confidential Submission: A Response to Itron's Price Comparison For FortisBC.

CONCLUSION

The basis of Fortis BC arguments regarding health issues is that the levels of RF EMF that will be emitted by its proposed ITRON meters are so low they are unlikely to cause human harm. This might be a more relevant argument if RF EMFs fell under WHO's Group 4 category "Probably not carcinogenic to humans". Since that is not the case the basis of FBC arguments should not be given any weight at all by the Commission. As noted on page 14 of the Exponent report, "The IARC report, however, does not comment on the level of exposure". The fact remains that any level of RF EMF in the 30 kHz to 300 GHz falls under the WHO's Group 2B category.. As long as this is the case, any member

of the public is justified in taking whatever steps they feel are necessary to limit their exposure to such an agent. No government agency should be able to take away their ability to do so.

Given the existence of equally viable and more affordable alternatives to wireless smart meters that do not carry a negative association with the WHO's Group 2B category, the Commission must deny outright the Fortis BC application for a Certificate of Public Convenience for its Advanced Metering Project as not in the public interest.

Respectfully,



Alex Atamanenko, MP
BC Southern Interior

Gp/

CEP 232 / SCEP 232