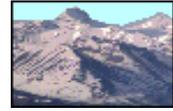


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November 23, 2012

Submitted via E-mail

Erica Hamilton - Commission Secretary  
British Columbia Utilities Commission  
Box 250 – 900 Howe Street – Sixth Floor  
Vancouver, BC V6Z 2N3

Dear Ms. Hamilton,

**Re: FortisBC Inc. Application for a Certificate of Public Convenience and Necessity  
for the Advanced Metering Infrastructure Project  
Response to the Order G-169-12, item #2, November 9, 2012.**

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As a registered intervener responding to the Order G-169-12, item #2, dated November 9, 2012, by the Commission requesting comments by interveners regarding the suspension of proceedings by November 23<sup>rd</sup>, I offer the following observations.

I have reviewed much of the material in this regard at this point and would note that there appears to be among interveners, a majority consensus that the proceedings should be suspended by the Commission until a fully developed proposal – an RFP response and analysis for a wired solution - is available for review by the panel. My own view since the beginning of my involvement in the application is that the PLC option is significantly valid, as distinguished with recent examples for service installations in Alberta and Idaho for over a million customers.

I would therefore concur with the reasonable and respectful views presented by Alex Atamanenko, MP, BC Southern Interior, when he stated in his submission November 22, 2012:

“The Commission has heard repeatedly throughout these proceedings that in the absence of scientific certainty, exercise of the 'precautionary principle' must be the uppermost consideration in their deliberations. The deployment of wireless smart meters and its related infrastructure to every home and community at this time is clearly premature and will remain so until enough evidence is presented that can assure a nervous public of its safety. With the exception perhaps of its manufacturers, it is not in anyone's interest to allow the imposition of a technology in people's homes that generate any measure of fear or nervousness, and is quite likely contrary to their Charter Rights.

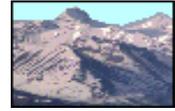
As an intervenor in this application, I urge the Commission in the strongest terms possible to suspend these proceedings until such time as a comprehensive business case for a wired smart meter option is presented by FortisBC to the Commission and is made available for public scrutiny.”

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I would also note that an available business case was made by FortisAlberta to justify the installation of PLC metering and there is nothing in my mind that would prevent a similar case being made for the FortisBC Inc. service area in rural and small community British Columbia.

Recently, comments published March 19, 2012, lauding the Alberta PLC system as noted below from PR Newswire, (2012), support a review for FortisBC Inc. customers of the PLC alternative:

"The award for Customer Engagement Excellence recognizes FortisAlberta's customer-focused approach to implementation of its advanced metering program. Since the project began in 2006, the utility has deployed Landis+Gyr's Gridstream™ PLC network and 480,000 advanced meters at residential and commercial accounts across a large portion of Alberta.

As a direct result of the advanced metering deployment, FortisAlberta has seen a reduction in customer service calls, a significant reduction in miles driven by employees and lower annual operating costs for metering services. Customer billing accuracy has improved from approximately 85% at the beginning of the project, to greater than 99% in January 2012."

Without the opportunity to fully consider the PLC option, FortisBC customers are at this point being denied a valued and functional alternative to the single RF proposal.

Sincerely,

Keith Miles  
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Trail, B.C. V1R 1Z4  
250-368-8728

PR Newswire (2012). *FortisAlberta Receives Award for Customer Engagement at Metering America; Utility Recognized for Use of Gridstream Advanced Metering Technology*. Retrieved from <http://smartgrid.ulitzer.com/node/2211203>