
From: Roger Middleton [roger.middleton@telus.net]
Sent: Thursday, October 24, 2013 12:12 PM
To: Commission Secretary BCUC:EX
Subject: Fw: Smart Meters - Re the Options offered by BC Hydro

Dear Commission Secretary,

Please note that I have completed and submitted my registration as intervener in the BC Hydro Smart Meter Choices hearings and that my application has been accepted..

My letter in support is included below.

Yours sincerely,

Roger Middleton

----- Original Message -----

From: [Roger Middleton](mailto:Roger.Middleton)
To: commission.secretary@bcuc.com
Sent: Thursday, October 24, 2013 9:37 AM
Subject: Fw: Smart Meters - Re the Options offered by BC Hydro

Further to my letter sent to you yesterday, as below, I wish to register as an intervenor and interested party.

Contact details are as follows:

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131 Twinflower Way
Salt Spring Island
B.C. V8K 1R4
(250) 537-5628

email roger.middleton@telus.net

----- Original Message -----

From: [Roger Middleton](mailto:Roger.Middleton)
To: commission.secretary@bcuc.com
Sent: Wednesday, October 23, 2013 5:49 PM
Subject: Smart Meters - Re the Options offered by BC Hydro

Dear Commission Secretary,

**Re Account: Sylvia Senensky
Account No.**

I am writing on behalf of my wife, the account holder and who is now in a long term care residence, to advise that we will be retaining our analogue meter.

Summary

1. BC Hydro's handling of the smart meter program has been riddled with error. This rollout may well be studied in business schools as a classic example of how not to handle the introduction of a new program.
2. BC Hydro need to offer choices based on positive incentives and not disincentives or penalties. It is a mistake for a monopolistic supplier of a service to fail to recognize this and attempt to bend consumers to its will through intimidation, coercion, a failure to properly communicate and the imposition of penalties.
3. There are ways to correct this situation. The needs and concerns of consumers should be addressed, not ignored, rebuffed or rejected out of hand.

Introductory Comments

The free world, capitalist system is based on one fundamental principle - that the consumer has choice. Competition in the marketplace ensures that this takes place.

To honour this principle and to emulate normal market conditions, a monopoly supplier, particularly one that is in the public domain, needs to supply consumers with a range of choices. By doing so, this enables the consumers to maximise their utility and feel satisfied with their choices.

When the management of a monopoly supplier, such as BC Hydro, attempts to force all consumers to accept their decisions in all matters, they can be forced into error and find consumers unhappy with the lack of choice available. After all consumers are not all alike and this reality is another key factor that allows the competitive marketplace to work so well. Ways to deal with this issue are discussed below under "Customer Options".

One way that BC Hydro can encourage more consumers to embrace corporate policy is to offer incentives to do so. Providing a discount on the first 1376 kw power usage for each billing period is a good example. Consumers are encouraged to conserve and this is in line with corporate policy.

Creating disincentives or penalties to apply to those who wish to opt out of the smart meter program is entirely the wrong way to go and is certain to cause a significant backlash that may well grow as time goes by. It also runs counter to theory expounded in the relatively new field of behavioral economics, which encourages the use of incentives, not disincentives and/or penalties to influence consumer behavior.

With these introductory comments in mind, let us review the current situation with the rollout of the smart meter program.

BC Hydro's Options

Recommendation:

It is here respectfully requested that the Commission reduce the monthly fee to a token level for customers who wish to retain their analogue meters.

Along with many others, I absolutely reject even the idea that BC Hydro should be allowed to charge \$35.00 a month to send someone to read my meter when other acceptable low cost options are available. This means, should the meter be read as it originally was - on a bi-monthly basis, that we are to be charged \$70.00 for each reading.

At this time, BC Hydro is perfectly happy accepting my readings, which I send them bi-monthly. Alternatively, I am happy to switch to the equal billing payment method, either of which methods require a manual reading once only a year. Does this mean that one reading per year should cost \$420.00?

Also, I am puzzled as to how BC Hydro was able to arrive at \$35.00 a month as the cost to them of the retention of my analogue meter. Not only are those of us retaining our analogue meters paying for the smart meter program through our hydro rates, as is everyone else, we will be forgoing the benefit of the lower rate applicable during off-peak periods once the dynamic pricing system is installed.

I do not object to paying for the program, as everyone else does, through rate increases to come, and can accept that we will be charged at peak rates 24/7 but to introduce a further charge of \$35.00 a month on top of these charges represents a form of extortion which I, for one, find highly distasteful.

If you could advise me the benefits that are worth \$420 p.a., to BC Hydro, and which will be lost to them because of my preference for an analogue meter, I would look forward to hearing from you on this point in your reply.

Health Issues

Recommendation:

The relatively small cohort of environmentally sensitive Canadians (now about 3% or approx. 1m Canadians) who are already experiencing difficulties with radiofrequency electromagnetic fields, should be recognized and their health issues acknowledged. As well, the size of this cohort should be monitored to determine whether or not it is growing or declining over time.

Many of us have health concerns. I have friends with autistic children and am aware of the fact that many people suffer from a range of environmental sensitivities that compromise their day to day life. I am a cancer survivor and remain conscious of the need to minimise my own exposure to a range of toxic substances.

The coldhearted exploitation of customers concerned about protecting their health, to the point of actually denying there even are health issues, and charging customers with health concerns for the privilege of retaining their analogue meters is, to my mind, the lowest of the low and an utterly despicable practice.

That a crown corporation would stoop this low to do so is beyond belief. It also runs counter to all the points raised above in the introductory comments.

With these comments in mind, I would like to point out that the World Health Organization has classified radiofrequency electromagnetic fields as possibly carcinogenic to humans (Group 2B).

Yet, in BC Hydro's opinion, there are no health risks, and that this is the finding of the scientists they have consulted. This does seem to be at odds with the opinion of the W.H.O.

They also fail to acknowledge the health profiles of the small cohort of environmentally sensitive Canadians (now about 3% or approx. 1m Canadians) who are already experiencing difficulties with radiofrequency electromagnetic fields.

In my opinion, the rights of this cohort should not only be acknowledged and accepted but the size of this cohort should be monitored to determine whether or not it is growing or declining over time.

Technological progress has been extremely rapid over the past 250 years and, while technological innovation can be rapid, the science around these innovations unfolds slowly and it can take decades before all the risks are known around any new innovation.

X-ray machines are no longer in shoe stores. While the technology allowed these machines to be invented and installed in shoe stores in the 1920's, it was not until the 1940/50's that they were deemed dangerous and removed from stores.

Asbestos was commonly installed in brake linings and as insulation in homes for many decades- altogether banned today. Cigarettes packs now have health warnings and this battle was long fought. The list goes on.

And, of course, the problem is complicated because the human body can tolerate a lot of abuse over the years and only breaks down under the stress of continued exposure to any stressor, or mix of stressors, after many decades of exposure. Hence the aged, with weakened immune systems, and our young, with developing immune systems, could be at the greatest risk.

In this regard, the last twenty years have seen an exponential growth in the use of wireless technologies. Therefore, it may be many decades before we fully understand the science behind this technology and how it affects human, animal and plant life.

Would it not therefore be prudent to explore the impact that wireless technology is having on the small cohort of electromagnetically sensitive individuals and take measurements to determine whether or not this cohort is growing? They may be the "canaries in the coal mine".

Just because the majority of BC residents do not have a problem now, does not mean that there may not be problems three or four decades on. This was our experience with asbestosis, lung cancer and many other cancers related to whole range of industrial pollutants.

Instead BC Hydro policy is to deny there are any health issues - an unenlightened and dangerous management policy, to say the least.

Expert Opinion and Industry Standard Issues

Recommendation:

BC Hydro's handling of the many concerns that have been raised has left much to be desired. These concerns should quickly be addressed in a manner that promotes confidence in the quality and safety of any equipment installed on residents' private property.

Another concern, interrelated with the above noted health issue, is the calling into question much of the expert opinion that has been obtained pertaining to industries supplying wireless technology. Not that I am arguing that deliberate error is advanced as opinion, but that these reports rest upon assumptions usually stated at the start of any report.

I therefore recommend the commission be aware of this issue for the position staked out by BC Hydro is riddled with weaknesses and dubious statements that leave many of us in doubt as to the veracity of their spokesmen.

(i) Fire Risk

BC Hydro denies there is a fire risk and quotes the one fire chief who holds to this position. My understanding is at odds with this, for I have been told that there are many more fire chiefs who will tell you that they simply do not know the actual cause(s) because these fires seem never to be investigated. BC Hydro argues that, if a fire does occur upon installation of a smart meter, it must be the fault of the wiring in the house. So, smart meters are **never** to blame. Never? Is denial always the best way to handle this kind of complaint?

Could it be that the installation of a smart meter can cause power surges that might act as a trigger? For one informed individual's observation, go to <http://emfsafetynetwork.org/fire-captain-finds-hazardous-power-surges-follow-smart-meter-installations/> .

(ii) Industrial Testing

On the subject of testing, we are informed that these meters have been approved by Industry Canada and that testing by a consumer friendly agency is not required under the Act. All this is true, but Industry Canada is focussed on industry, not consumers, and did not carry out the testing itself. This was done by a private corporation. It is also not clear whether this testing was a once off event or is ongoing. Most quality control systems, certainly the ones I have been associated with, monitor production on an ongoing basis.

BC Hydro's adamant refusal to allow either Underwriters' Laboratories or CSA to test these meters leaves many to wonder whether UL and CSA standards are more stringent than those required by Industry Canada, who may well have obtained their testing parameters from BC Hydro anyway.

(iv) Billing Accuracy

While Measurement Canada has approved these meters, there is much anecdotal evidence indicating that some consumers have experienced elevated bills, being charged much more than was their experience prior to the installation of a smart meter at their residences. Further testing seems warranted.

(v) Other Issues

Issues around cyber security and privacy (which involve the inclusion of the Zigbee chip) have also been raised. The former is an issue for BC Hydro to address, and the latter issue discussed in the next section.

Consumer Options

Recommendation:

A range of meter options should be presented to consumers, based on consumer demand, needs and preferences. Incentives, not penalties should be used to promote corporate policy.

As noted at the start of this letter, choice is the fundamental driver of a competitive marketplace and, by this means, customers' needs and preferences are taken fully into account.

BC Hydro could easily introduce choice by offering a range of products, with incentives for each as per the needs of corporate policy. Disincentives, such as is offered now in the pricing penalty customers preferring analogue meters are being forced to pay, should be avoided at all costs.

Some customers will want to have a meter that will enable them to control appliances from their smart phones. The Zigbee chip installation, I understand, would allow them to do so.

Others, whose concerns are about privacy, and whose health is robust, may prefer the smart meter with the Zigbee chip disabled or, preferably, excluded altogether.

Better still for all consumers accepting smart meters, the on/off control of the Zigbee chip should be in consumers' hands, not BC Hydro's.

Those of us with health concerns, who wish to retain our analogue meters, should not be penalized for doing so.

Concluding Remarks

One of the hallmarks of technological progress is our ability to improve the design of products and learn from things that go wrong. As well, we have learned to regulate the use of technologies deemed harmful (eg x-rays, cigarettes, alcohol, ethical pharmaceuticals and drugs) but only in cases where life and health are deemed to be at risk are technologies or products banned.

Nobody is suggesting a ban on smart meters. However, it would be imprudent for BC Hydro to refuse to accept the possibility that there are risks involved, acknowledge that this technology is evolving, and seek to do its best to encourage this evolution, but that is not what we are being told.

As a case study, the manner in which BC Hydro has handled this program rollout has been remarkable for its lack of skill in the area of customer relations.

Denial of any problems, a refusal to do anything but talk at customers, not with or to them is not the recommended approach of business consultants who advise in these matters.

The use of intimidation, bullying and rudeness by Corix installers (not all, but enough to create alarm) and now, this resort to extortion, as the final solution for British Columbians who are resisting the smart meter program, is just not the right way to go.

If BC Hydro refuses to have a conversation with us, and stays holed up behind talking points, there is little likelihood that customer relations will improve. In fact, it is more likely that a growing number of customers will become angry about this policy, as is indeed happening in other jurisdictions around the world.

In fact, I suspect the implementation of this program by Hydro utilities around the globe will finish up at business schools as a case study to demonstrate what not to do when faced with informed opposition from a segment of the public that has taken the trouble to become educated in the issues involved.

In this age of internet connectivity, is denial any longer a viable strategy for any large corporation, a monopoly supplier and publicly owned at that, when handling informed opposition to its actions?

Yours sincerely

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Applications

- Current Applications
- Archived Applications
- Create Application Profile

Documents

- Current Documents
- Submit Document

Users

- Current Users
- Registration
- Distributed List

Others

- Companies
- Maintain Dropdown Lists
- Maintain Document Types

Edit User

Last Name, First; e.g. Smith, John

Name*: Middleton, Roger

Professional Designation: B.E. (Mech), B.Com. (Econ), C.F.A.

Organization: retired

Job Title:

Representing: self

User Type*: Applicant Interested Party Intervener Other

Address*: 131 Twinflower Way

City*: Salt Spring Island

Province*: BC

Postal Code*: V8K 1R4

Phone*: 250-537-5628

Cell/Pager:

Fax:

Primary Email: roger.middleton@telus.net

Email 2:

Email 3:

Email 4:

Role*: EndUser

Approved Status: Approved?
Only approved users will be allowed to access submit file function.

* - Required

Copy to:

-
-
-

Change user name and password

User Name* (No Spaces): rmiddleton

Password* (No Spaces):

Active Energy Reconsideration A-1-13
BC Hydro Application to Amend TS No 74 (GBL)
BC Hydro Electric Tariff-OATT Price Indices Replacement
BC Hydro MRS Assessment Report No 6
BC Hydro OATT Ferc Order 764 Amendments
BC Hydro PPA - RS 3808, TS No. 2 & 3
BC Hydro Smart Meter Choices Program
BCUC Generic Cost of Capital ~ Stage 1
BCUC Generic Cost of Capital ~ Stage 2
BCUC Proposed Regulatory Framework and Guide for TES Utilities
Creative Energy Acquisition of Central Heat Distribution
FEI Biomethane Post Implementation & Program Modification (2012 Biomethane)
FEI FEVI GSMIP 2013-2016
FEI Performance Based Ratemaking Revenue Requirements 2014-2018
FEU Common Rates, Amalgamation, and Rate Design Reconsideration Phase 2
FEVI 2014 Revenue Requirements and Rates
FortisBC Inc Purchase of the Utility Assets of the City of Kelowna ~ Phase 2
FortisBC Inc Stepped and Stand-By Rates for Transmission Voltage Customers
FortisBC Inc. AMI Radio-Off Meter Option
FortisBC Inc. Performance Based Ratemaking Revenue Requirements 2014-201
ICBC 2013 Revenue Requirements
PNGNE CNG Virtual Pipeline DC TR CPCN

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