
From: Susanna Kaljur [REDACTED]
Sent: Friday, November 1, 2013 4:37 PM
To: Commission Secretary BCUC:EX
Subject: letter of comment

Dear BC Utilities Commission:

I am registered as an Interested Party and I am submitting this as a letter of comment

Please consider the following information from a country with a similar climate and infrastructure as our own, Germany.

"The German Federal Ministry of Economics (BMWi) has published a study analyzing the costs and benefits of a full roll-out of smart meters in Germany. It concludes that it is not advisable and not in the interest of German consumers to implement the EU targets which would require that at least 80 % of consumers shall be equipped with intelligent metering systems by 2020.

Pursuant to No. 2 of Annex I to EU Directive 2009\72\EC of 13 July 2009 concerning common rules for the internal market in electricity, Member States shall ensure the implementation of intelligent metering systems that shall assist the active participation of consumers in the electricity supply market. The implementation of those metering systems may be subject to an economic assessment of all the long-term costs and benefits to the market and the individual consumer, or which form of intelligent metering is economically reasonable and cost-effective, and which time frame is feasible for their distribution. This shall take place by 3 September 2012.

The study, prepared by Ernst & Young on behalf of the ministry, was published on 30 July 2013. It shall serve as such an economic assessment.

The study also makes recommendations for options to implement the newly introduced Section 21c para. 5 German Energy Act which authorizes the German legislator to develop a different standard of smart meters for small customers. Such customers are not subject to the mandatory installation of smart meters pursuant to Section 21c para. 1 German Energy Act.

The study comes to the conclusion that smart meters in particular for small consumers are not cost-efficient, as the potential savings would be well below actual costs of smart meters and their operation. Therefore, it would not be reasonable to impose the 80 % target on German utilities and consumers." See link below:

No Nationwide Roll-Out of Smart Meters Recommended According to Cost-Benefit Analysis
<http://www.germanenergyblog.de/?p=13875>

This study also makes it clear that it is not necessary that all customers (via mandatory installation) have a smart meter in order for the electrical grid to function properly, something BC Hydro has previously claimed.

As a retiree struggling with an auto immune disorder, I am following my physician's recommendation to avoid unnecessary exposure to Radio Frequency Electromagnetic Fields (RF-EMF) which are classified as a Class 2B carcinogen by World Health Organization.(2011). RF-EMF includes: cell phones, WiFi, cordless (DECT) phones, baby monitors AND smart meters. I have followed my doctors orders and removed all of the above items from my home. My internet, telephone and computer are all hard wired. My overall health and sleep is significantly better for it and my regular blood work reflects this improvement.

Now Hydro demands that I pay 35\$ a month in order to keep my old (but still works fine) meter. This "fee" is close to one half of my total monthly hydro bill! I have spent considerable money to retrofit my home to reduce energy consumption, I did not require a smart meter to do this. I am on a fixed income and according to BC Hydro, if I do not pay by Dec.1 2013, my "account will enter arrears and I will be subject to a service disconnection" undated Hydro letter received Sept. 2013. I contacted BC Hydro to find out how often my meter was actually read in 2013, was told (Jan, March and Sept.). I have no problem with reading the meter myself by taking a photo and sending data to Hydro as needed (3 times this year). I recognize that electrical theft is a serious crime and fraudulent readings should be heavily fined, this could be accomplished with random checks of meters . It is unfair to penalize law abiding and bill paying customers for illegal theft of electricity done by others. I have the right to limit potential environmental hazards in my home and smart meters are one such hazard as classified by the World Health Organization.

Since the BC Utilities Commission has been "directed" by the BC Liberal government to approve the costs as presented by BC Hydro, the "money for nothing" from 60,000 tax payers and customers who have chosen to opt out of a smart meter adds up to \$25,200,000.00 per year! The Oxford Dictionary definition of extortion is to "obtain by force, threats or other unfair means". Extortion thy name is BC Hydro as "directed" by the BC Liberal Government.

How can a regulatory body provide fair and democratic regulatory oversight, when the government (or industry) **directs** the BCUC to do their bidding which includes limiting the review the amount of the fees only and not allowing BCUC to waive the fees? Order in Council No. 391, Direction No. 4 seems a conflict of interest, where the best interest of the public and their health and privacy have not been adequately taken into consideration.

Since the Direction No. 4 has removed the possibility for the BCUC to waive the fees. I question the legality of this directive, however I am not a lawyer. If this directive is deemed as legal then I request that "Opt Out" fees be significantly reduced to a maximum of \$10.00 per month or \$10.00 per **actual** meter reading for an annual **maximum** total of \$120.00 (which ever is lesser). I also request that "Opt Out" Fees be waived for those individuals with health concerns where their doctor has recommended avoidance of unnecessary exposure to RF-EMF. I also request the "Opt Out" Fees be waived for individuals on income assistance, those who receive disability pensions as well as those on fixed limited incomes at or below the poverty line.

Sincerely,
Susanna Kaljur

[Redacted signature block]

--
Susanna Kaljur [Redacted] "Keep knocking, and the joy inside will eventually open a window and look outside to see who's there." -Rumi