

Edward S. Finley, Jr., Chair
North Carolina Utilities Commission
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October 8, 2017

Subject: Docket Number E-100 Sub 147, Duke 2017 Smart Grid Technology Plans of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC

Subject: Docket Number E-7 Sub 1115, Duke Energy Carolinas, LLC's AMI Opt-Out Rider

Subject: DOCKET NO. E-7, Sub 1146, Application for General Rate Case

Dear Chairman Finley:

I am providing comments to Duke Energy Carolina's (DEC) subject Dockets. The information provided by DEC in Docket E-100 Sub 147 has direct implications for the decision the NCUC makes regarding E-7 Sub 1115 and E-7 Sub 1146. As you know, I and many others are strongly opposed to allowing DEC charge any fee in refusing an AMI/Smart Meter (E-7 Sub 1115), also known as the opt-out rider. And, analog meters must be reconsidered a viable option towards safeguarding our health and privacy.

The federal government never made Smart Meters mandatory: **Energy Policy Act of 2005**, Title XII, Subtitle E, Section 1252, (a), (14), (C): "*Each electric utility subject to subparagraph (A) shall provide each customer requesting a time-based rate with a time-based meter capable of enabling the utility and customer to offer and receive such rate, respectively.*"

From DEC's own numbers, changing meters costs on average only \$25, not \$150 as they have proposed. (Docket Number E-100 Sub 147, 2017 Smart Grid Technology Plan Update, Appendix C, pg. 5 or pg. 96 of full PDF)

DEC's spreadsheets show that the largest reduction in its costs (and thus increase in its profits) will come from the need for fewer "truck rolls" and for fewer meter readers - nothing to do with the smart meter technology. There are **non-emitting** meters in use now that connect through a telephone line to report customer usage, which does not require a meter reader or a monthly truck roll. This method should be fully developed to include internet/ethernet and fiber-optic connections. There are also additional costs for radiation-emitting meters, including the need to replace the 2G/3G cellular modems by 2022, and regular replacement of batteries for all non-analog meters.

Using an analog meter is the **only** way to remove the negative health effect that digital meters and their switching mode power supplies cause with household wiring and appliances. DEC has many analog meters and has retrofitted them with antennae to become radiation-broadcasting devices. These can be salvaged and used as regular analog meters with no negative health effects while preserving our privacy regarding usage data.

Analog meters must be available as the best option for those suffering from the deleterious health effects associated with smart meters, digital emitting or digital non-emitting meters. Analogs are also more accurate, being more resistant to solar inverter “dirty” electricity and other switch mode power supply noise that is and will become more and more prevalent on the grid. Analog meters can be implemented without adding the cost of a meter reader through either the telephone/internet-connect mentioned above or an Equal Pay Plan with an annual true-up.

I strongly urge the NCUC to reject any proposed fees for all the reasons I and others have stated previously.

This proposed fee appears even more ridiculous in light of the fact that Duke Energy will experience over \$1 billion in benefits from AMI implementation (Number E-100 Sub 147, Duke 2017 Smart Grid Technology Plans of Duke Energy Carolinas, Appendix C, Exhibit C).

Duke Energy is not guaranteed the highest profits possible. Many people who are injured by radiofrequency radiation (RFR) emitting technology have experienced significant financial hardship because they are unable to maintain their traditional employment. As has been stated in previous correspondence, children are often the most vulnerable to the adverse health impacts of RFR, and to charge their parents a fee to avoid RFR and keep their children safe in their own home is inhumane.

By DEC's Numbers

DEC states that “DEC will be removing and replacing approximately 1.32 million AMR (Automated Meter Reading - "drive-by") meters over the three-year period beginning in 2017 and ending in 2019. The estimated salvage value of those meters is \$1.37 M” (E-100 Sub 147, Duke 2017 Smart Grid Technology Plans, page 7). Given that DEC anticipates few people choosing to refuse AMI meters, the salvage value of the AMR meters should easily offset the laughably minuscule impact to DEC's over \$1 billion dollars in benefits. The customers paid for those meters and should benefit from their salvage value. It shakes the soul that a company experiencing this windfall would try to squeeze money from those who are sickened by its technology.

On a related note, it is appalling that DEC is using the installation of AMI meters as a reason to raise consumer rates, per DOCKET NO. E-7, SUB 1146. In Donald Schneider's DEC testimony of August 27, 2017, there is no mention of DEC's \$1 billion in benefits from AMI installation, no mention of salvage value from existing AMR meters,

but he makes the case that DEC must increase its rates to accommodate smart meter deployment (page 10). To request that the public pay more so that DEC can earn more is wretchedly unfair and completely unacceptable.

DEC Stakeholder Work

DEC discusses its stakeholder outreach in Docket Number E-100 Sub 147. I urge the NCUC to obtain more details on this effort. Over two years ago I sent two letters, one via certified mail (attached), to Ms. Susan Vick, requesting to meet with DEC about smart meter concerns. DEC ignored this request to work jointly and proactively to find a solution. How has DEC dealt with other stakeholders with whom it disagrees? Do they ignore them too? Stakeholder outreach traditionally does not involve meeting only with those who agree.

Conclusion

I urge the NCUC to reject DEC's proposed AMI refusal tariff and its proposed rate increase to install AMI meters. With over \$1 billion dollars in DEC benefits anticipated from DEC's proposed AMI installation, the last thing customers should be expected to do is fund this windfall at the expense of their health. Analog meters are best solution to protect our health and privacy. I'd like you to see this reasoning as well and put it back on the table, regardless of complaints from DEC.

Thank you for your consideration.

Sincerely,

Andrew McAfee

Raleigh, North Carolina