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January 29, 2018

Hon. Kathleen Burgess
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza Agency Building 3
Albany, NY 12223-1350

Re: Case 17-M-0178 - Petition of Orange and Rockland Utilities, Inc.
for Authorization of a Program Advancement Proposal.

Dear Secretary Burgess,

The New York Safe Utility Meter Association, "NYSUMA," supports the Kopald request for a rehearing in case 17-M-0178.

In July 2016, Michele Hertz, who is currently NYSUMA's President, requested all of the PSC's testing requirements for electronic meters. In response, on July 29, 2016, Martin Insogna emailed to Ms. Hertz the following document: Department of Public Service 16 NYCRR Part 92 Operating Manual March 14, 2003. The manual has in it the accuracy testing rules for analog meters, which shows that the approval of electronic meters, including AMR, ERT and "smart" meters, was based on accuracy testing rules designed for analog utility meters, rather than for computerized electronic meters.

Moreover, the PSC has not presented any qualified expert reports regarding radiofrequency radiation emissions or electrical fire safety relating to the electronic meters that it approved. This indicates that there are no experts at the PSC who studied or tested electronic meters for radiofrequency emissions exposure or electrical fire safety before the meters were approved. That omission is consistent with the fact that, in the cases pending before the PSC relating to utility meters, there are NO qualified experts making decisions about the health, electrical fire safety or hidden costs of a metering program that many New York State residents do not want.

The PSC continues to approve electronic meters although there are reports that each type of electronic meter used in this state is causing health and/or electrical safety and/or over-billing problems. These reports are now beyond a coincidence. We have listed the PSC proceedings below in which the public has reported these problems, but the PSC has dismissed them. What we do not know is how many letters, calls and emails on this subject the PSC has received and discarded. The following email was sent to the PSC for case #14-M-0196. The PSC never posted it in Public Comments for case #14-M-0196.

Dear Secretary Burgess,

I hope you can help me. I was forced to accept the smart meters here in the Bronx. Immediately after installation I suffered headaches nose bleeds, bone pain, tinnitus & horrible insomnia. Prior to this, I had none of this. My 14 yr old daughter suffering with headaches & insomnia. I reported these immediate symptoms to my Dr & he ordered an MRI of my brain. At that time my MRI was normal. Symptoms continued. Two yrs after installation, I now have a brain tumor, narrowing of veins in my head to the point I needed emergency surgery to have a stent put in. My life has been placed upside down to the point I am so sick I cannot work. I wrote to the utilities to please remove these meters, & no response.

Thank You

Sincerely,

Anne XXXXXX

Ms. Hertz inquired as to why the letter and others had not been posted. Michael Corso told her that the PSC would no longer be posting any comments to that case if those comments were related to health.

There are no known reports of health or electrical safety problems with analog meters.

Below are the cases that we know of in which the PSC has ignored not only all Public Comments and Filed Documents relating to electronic utility meters, but also the PSC's own questions.

NYSPSC Case Number 10-E-0285 (see Public Comments)

“Proceeding on Motion of the Commission to Consider Regulatory Policies Regarding Smart Grid Systems and the Modernization of the Electric Grid” (See 59 Public Comments)

<http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=10-E-0285>

After this proceeding, the PSC wrote the 2011 “Smart Grid Report”. The report raised questions about the health safety, privacy and cyber security aspects of electronic utility meters. However, the Commission’s own questions were subsequently ignored and never investigated or resolved.

NYSPSC Case Number 14-M-0101

“Reforming the Energy Vision”

(See Public Comments - mainly on pages 13,14,15)

<http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=14-m-0101&submit=Search+by+Case+Number>

Video -NYSPSC REV Hearings in Kingston, NY

https://www.youtube.com/watch?v=0w7W7-aL_jg

<https://www.youtube.com/watch?v=pBp0sCQL28A>

(“smart” meter complaints and comments were made at the NYSPSC Long Island and Westchester REV hearings but were not filmed)

NYSPSC Case: 14-M-0196

Tariff filing by Central Hudson Gas & Electric Corporation to establish fees for residential customers who choose to opt out of using Automated Meter Reading devices.

(See Public Comments and Filed Documents)

<http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=14-M-0196&submit=Search+by+Case+Number>

Over 1,000 Woodstock residents signed a petition regarding a no-fee analog meter choice.

NYSPSC Case Number 17-M-0178

Petition of Orange and Rockland Utilities, Inc for Authorization of a Program Advancement Proposal

The PSC has repeatedly and consistently ignored its own rules and regulations in favor of the utility industry in this matter. This misconduct – at the expense of the health and safety of New York State residents – is unacceptable.

Thank you.

Sincerely,

Weston Blelock
Anita Gherke
Michele Hertz
Toby Stover