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December 12, 2012

Rosemary Chiavetta, Secretary  
 Pennsylvania Public Utility Commission  
 Commonwealth Keystone Building  
 400 North Street, Second Floor  
 Harrisburg, PA 17120

**RE: Renney Thomas v. PECO Energy Company**  
**PUC Docket No.: C-2012-2336225**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission are the following documents in the matter referenced above.

- Answer
- Answer & New Matter
- Motion to Dismiss
- Motion for Judgment on the Pleadings
- X Preliminary Objection
- Exceptions
- Reply Exceptions
- Main Brief
- Reply Petition

I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties. Thank you for your time and attention on this matter.

Very truly yours,

Shawane Lee  
 Counsel for PECO Energy Company  
 SL/lo

Scheduling Recommendation: Call of the docket \_\_\_ Non Call of the docket \_\_\_

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**RENNEY THOMAS** :  
    **Complainant** :  
    v. :       **DOCKET NO. C-2012-2336225**  
    : :  
**PECO ENERGY COMPANY** :  
    **Respondent** :  
    :

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**NOTICE TO PLEAD**

Pursuant to 52 Pa. Code §§ 5.101 and 5.62(c), you are hereby notified that, if you do not file a written response denying or correcting the enclosed Preliminary Objections of PECO Energy Company within 20 days from service of this notice, a decision may be rendered against you. All pleadings, such as a Reply to Preliminary Objections, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PECO Energy Company, Shawane L. Lee, and where applicable, the Administrative Law Judge presiding over the issue.

File with:  
Rosemarie Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120

With a copy to:  
Shawane L. Lee, Esq.  
PECO Energy Company  
2301 Market Street, S-23  
Philadelphia, PA 19103

Dated at Philadelphia, PA, December 12, 2012



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Shawane L. Lee  
Counsel for PECO Energy Company  
2301 Market Street S-23  
Philadelphia, PA 19101-8699  
215-841-6863  
Shawane.Lee@exeloncorp.com

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>RENNEY THOMAS</b>	:	
<b>Complainant</b>	:	
v.	:	<b>DOCKET NO. C-2012-2336225</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**PRELIMINARY OBJECTION OF RESPONDENT,  
PECO ENERGY COMPANY**

Respondent, PECO Energy Company (“PECO Energy”), pursuant to 52 Pa. Code § 5.101(a)(4) respectfully petitions this Honorable Commission to dismiss the instant Complaint as legally insufficient.

1. On September 21, 2012, PECO Energy was served with a formal complaint filed by Renney Thomas (hereafter “Complainant”). A copy of the Complaint is attached hereto as Exhibit “1”.

2. In his Complaint, the Complainant alleges the following:

Wife is pregnant in 3<sup>rd</sup> trimester. New PECO meters are a fire hazard and have been known to spontaneously combust. Due to late stage pregnancy and children in the house, evacuation may be hampered and lead to loss of life. New PECO meter wirelessly communicates usage data at shorter intervals and hence increases the electromagnetic field exposure to the occupants inside the house. This includes mother and fetus. The Smart Meter has two transmission devices: one cellular and one Wi-Fi. The Wi-Fi portion communicates with other Smart Meters in the neighborhood in a mesh network. The cellular transmitter transmits data to PECO. The residential Smart Meter may act as a relay for the entire neighborhood and increase the duty cycle of the meter, further increasing the field exposure for the occupants of the residence. The electromagnetic fields pose a threat to fetal brain development, genetic disorders, sleep disorders and birth defects. It will also disrupt normal cellular and physiological function.

See Exhibit “1”.

3. In his request for relief, the Complainant states:

We would like to continue using the old meter indefinitely.... *We would like to opt out from the installation of the new smart meter indefinitely.*

See Exhibit “1”.

4. PECO Energy simultaneously filed an Answer and the instant Preliminary Objection.

5. Pursuant to 52 Pa. Code § 5.101, preliminary objections may be filed against a complaint and dismissed for legal insufficiency. 52 Pa. Code § 5.101(a)(4).

6. Commission procedure regarding the disposition of preliminary objections is similar to that utilized in Pennsylvania civil procedure. Equitable Small Transportation Intervenor. v. Equitable Gas Co., 1994 Pa.PUC LEXIS 69, Docket No. C-00935435 (July 18, 1994).

7. In deciding preliminary objections, the Public Utility Commission must determine, based on the factual pleadings of the petitioner, if relief or recovery is possible. Roc v. Flaherty, 527 A.2d 211 (Pa. Cmwlth 1985).

8. A complaint must be able to recover under the law to survive a preliminary objection. Milliner v. Enck, 709 A.2d 417, 418 (Pa. Super. Ct. 1998) (“preliminary objection should be sustained only where it appears with certainty that, upon the facts averred, the law will not allow the plaintiff to recover”).

9. All of the non-moving party's averments must be taken as true for the sake of deciding the preliminary objection. County of Allegheny v. Commw. of Pa., 490 A.2d 402 (Pa. 1985).

10. The court does not, however, need to accept, "unwarranted inferences from facts, argumentative allegations, or expressions of opinions." Feingold v. McNulty, 2009 Phila. Ct. Com. Pl LEXIS 167, \*3.

11. Section 703 of the Public Utility Code, 66 Pa. C.S.A. § 703(b) provides that the Commission may dismiss any complaint without a hearing if, in its opinion, a hearing is not necessary to the public interest.

12. A hearing is required only when there is a disputed question of fact, and is not required to resolve questions of law. Dee-Dee Cab, Inc. v. Pa.Pub. Util. Comm'n, 817 A.2<sup>nd</sup> 593 (Pa.Commw. Ct. 2003), petition for allowance of appeal denied, 836 A.2d 123 (Pa. 2003).

13. Here, there are no genuine issues of fact and PECO Energy is entitled to judgment as a matter of law with respect to all of the allegations in the Complaint.

#### **I. Legal Insufficiency – Prior Commission Approval of Smart Meter Installation**

14. The Complainant has requested that he be permitted to "opt out" of the smart meter installation at his residence.

15. PECO Energy's Smart Meter installation plan was approved by the Pennsylvania Utility Commission on May 6, 2010, as a part of the Smart Meter Technology Procurement and Installation Plan, ("Smart Meter/Smart Grid Plan") at docket number M-2009-2123944.

16. By way of background, Governor Edward Rendell signed Act 129 of 2008 into law on October 15, 2008. The Act took effect 30 days thereafter on November 14, 2008, and

amended Section 2807 of the Public Utility Code. Among other things, the Act specifically directed that electric distribution companies (such as PECO Energy) with more than 100,000 customers file smart meter technology procurement and installation plans with the Commission for approval. See 66 Pa. C.S. § 2807(f). The statute does not provide customers with an option to “opt out” of smart meter installation.

17. On June 18, 2009, the Commission adopted a Smart Meter Procurement and Installation Implementation Order (“Implementation Order”) to establish the standards each plan must meet and to provide guidance on the procedures to be followed for submittal, review and approval of all aspects of each smart meter plan. See Smart Meter Procurement and Installation Implementation Order, entered on June 24, 2009, at Docket No. M-2009-2092655.

18. Specifically, the Commission’s Implementation Order states:

Act 129 requires EDCs to furnish smart meter technology (1) upon request from a customer that agrees to pay the cost of the smart meter at the time of the request, (2) in new building construction, and (3) in accordance with a depreciation schedule not to exceed 15 years. 66 Pa.C.S. § 2807(f)(2).

\*\*\*\*\*

The Commission believes that it was the intent of the General Assembly to require all covered EDCs to deploy smart meters system-wide when it included a requirement for smart meter deployment “in accordance with a depreciation schedule not to exceed 15 years.”

**THEREFORE,  
IT IS ORDERED:**

1. That the Commission establishes specific smart meter technology minimum capabilities and procedures for submittal, review and approval of all aspects of each smart meter plan to include cost recovery.

2. That electric distribution companies with greater than 100,000 customers adhere to the guidelines for smart meter technology procurement and installation identified in this Implementation Order.

3. That the Director of Operations convene a stakeholder meeting no later than July 17, 2009, to discuss issues related to the costs and benefits associated with the Commission imposed smart meter capability requirements.

4. That all electric distribution companies that are required to file a smart meter technology procurement and installation plan file such a plan consistent with the directives contained in this order by August 14, 2009.

See id.

19. The Commission's Order does not have a provision for customers to "opt out" of the smart meter installation.

20. Through its Implementation Order and policies, the Commission has approved the smart meter implementation process required by Act 129.

21. Indeed, Pennsylvania PUC Chairman, Robert F. Powelson stated:

Act 129 of 2008 has really paved the way for the rollout of smart meters, also referred to as Advanced Metering Infrastructure (AMI), and the implementation of Act 129 continues to benefit Pennsylvania customers. As I see it, smart meter technology is a "win-win" situation for the Commonwealth – both electricity customers and electricity providers alike reap the benefits of advanced meters.

See PaPUC Chairman Powelson on Smart Meters and Pennsylvania's Energy Future at <http://www.smartgridlegalnews.com/interviews/papuc-chairman-powelson-on-smart-meters-and-pennsylvanias-energy-future/>

22. On August 14, 2009, PECO Energy filed with the Commission its Petition of PECO Energy Company for Approval of its Smart Meter/Smart Grid Plan.

23. Amongst other things, PECO Energy's Petition requested that the Commission approve the deployment of up to 600,000 smart meters. See PECO Energy's Smart Meter/Smart Grid Petition.

24. As a part of PECO Energy's meter deployment plan, the company committed to deploy 600,000 meters by March 2013, upon receiving American Recovery and Reinvestment Act funding from the Department of Energy. See id.

25. PECO Energy's Implementation plan does not give customers the option to "opt out" of smart meter installation.

26. By Order entered May 6, 2010 at Docket No. M-2009-2123944, the Commission approved PECO Energy's Smart Meter/Smart Grid Plan.

27. The Commission's Order approving PECO Energy's plan does not provide an "opt out" provision.

28. In conjunction with the Commission's Implementation Order; the Commission-approved Smart Meter/Smart Grid Plan and continuing compliance with Act 129, PECO Energy has deployed over 194,000 Advanced Metering Infrastructure ("AMI") meters in customer's homes and businesses.

29. Act 129, the Commission's Implementation Order; and PECO Energy's Commission-approved Smart Meter/Smart Grid Plan do not provide customers the ability to "opt out" of having a smart meter installed in their homes or businesses. See 66 Pa. C.S. § 2807(f). See also Smart Meter Procurement and Installation Implementation Order, at Docket No. M-2009-2092655. See PECO Energy's Smart Meter/Smart Grid Plan at docket number M-2009-2123944.

30. The absence of an "opt out" provision in the existing statute; Implementation Order; and Smart Meter/Smart Grid Plan is underscored by a recent bill introduced at the General Assembly.

31. House Bill 2188, which was introduced on February 8, 2012, seeks to change the existing law by adding a “opt out” provision. Specifically, House Bill 2188 reads as follows:

*Section 2807(f) of Title 66 of the Pennsylvania Consolidated Statutes is amended by adding a clause to read:*

*§ 2807. Duties of electric distribution companies.*

\* \* \*

*(2) Electric distribution companies shall furnish smart meter technology as follows:*

*(iii) In accordance with a depreciation schedule not to exceed 15 years.*

*(iv) Customers may request to opt out of receiving smart meter technology under subparagraph (iii) by notifying, in writing, the electric distribution company. Meters for customers who opt out will be replaced according to a useful life depreciation schedule.*

32. House Bill 2188 attempts to address individual customer concerns about the smart meter (such as the Complainant’s concerns) by allowing individual customers to “opt out” of receiving smart meter technology on the mandatory schedule established by Act 129.

33. The “opt out” provision; however, has not been scheduled for a vote by the General Assembly, and the ability to opt out of smart meter installation is not currently permissible under the law.

34. Accordingly, the Complainant’s formal complaint, requesting the ability to “opt out” of smart meter installation should be dismissed as a matter of law.

35. The Commission has reached a similar conclusion with cases concerning PECO Energy’s elimination of the Residential Heating rate, which was required by the Electricity Generation Customer Choice and Competition Act of 1996, 66 Pa.C.S. §§ 2801-15.

36. There have been multiple formal complaints filed by individual customers in opposition to phasing out the Residential Heating Rate.

37. The PUC precedent for formal complaints filed against PECO Energy and other utility companies in opposition of the elimination of the Residential Heating rate is clear and

unambiguous. These complaints are dismissed as a matter of law pursuant to 66 Pa.C.S. §§ 2801-15. See e.g. Tshudy v. PPL Electric Utilities Corp., Docket No. C-2009-2092230 (Order entered August 21, 2009); Dunham v. PPL Electric Utilities Corporation, Docket No. C-2010-2155056; Kupchinskas v. PECO Energy Company, Docket No. C-2011-2253896; Brickner v. PPL Electric Utilities Corporation, Docket No. C-2009-2105583.

38. Like the complaints filed in opposition to the elimination of the Residential Heating rate, this Complaint objecting to the installation of the smart meter, and requesting an “opt out” should be dismissed.

39. The Complainant’s Complaint does not allege that PECO Energy improperly installed the meter in any way contrary or inconsistent with the Commission-approved Smart Meter/Smart Grid Plan.

40. The Complainant simply alleges that he wants to “opt out” of smart meter installation.

41. Assuming that everything the Complainant alleges in his Complaint is true, PECO Energy is operating under the basis of Act 129 and the specific direction given to the company by the legislature and the Commission through the Commission’s Implementation Order.

42. The Complainant’s Complaint, objecting to the installation of a smart meter at his residence, does not allege a violation of any order, law or tariff that can be the basis of any finding against PECO Energy.

43. Further, as the law currently stands, pursuant to Act 129 and the Commission’s Implementation Order, customers do not have the ability to “opt out” of smart meter installation.

44. Because PECO Energy's smart meters are being deployed in compliance with the Commission-approved Smart Meter/Smart Grid Plan, and the law does not provide for the Complainant to "opt out" of smart meter installation, there is no legal basis for the Complainant's Complaint.

45. This issue was recently addressed by Administrative Law Judge (ALJ) Joel Cheskis in Maria Povacz v. PECO Energy Company, Docket No. C-2012-2317176, Initial Decision, dated September 28, 2012, and he found there was no legal basis for the Complainant, Maria Povacz's complaint. In that case, the Complainant requested to opt out of smart meter installation at her home, raising a number of health concerns as the basis for opting out. ALJ Cheskis dismissed the complaint on PECO Energy's Preliminary Objections. In his opinion, ALJ Cheskis stated:

The Commission believes that it was the intent of the General Assembly to require all covered Electric Distribution Companies to deploy smart meters system-wide when it included a requirement for smart meter deployment 'in accordance with a depreciation schedule not to exceed 15 years.' Smart Meter Procurement and Installation Implementation Order, Docket No. M-2009-2092655 (entered June 24, 2009).

46. This issue was also addressed by Administrative Law Judge (ALJ) Kandace F. Melillo in Theresa Gavin v. PECO Energy Company, Docket No. C-2012-2325258, Initial Decision, dated November 26, 2012, and she found no legal basis for the Complainant, Theresa Gavin's complaint. In that case, the Complainant requested to opt out of smart meter installation at her home and requested that the smart meter be removed from her neighbor's home because of health concerns. ALJ Melillo dismissed the complaint on PECO Energy's Preliminary Objections. In her opinion, ALJ Melillo stated:

To the extent that [Complainant] desires the ability to “opt out” of the smart meter installation, she should advocate for such ability before the General Assembly. In the alternative [Complainant] could also file a petition for rescission or amendment of the Implementation Order, supra, entered June 24, 2009, and the PECO Smart Meter Approval Order, supra, entered May 6, 2010, pursuant to Section 703(g) of the Public Utility Code, 66 Pa.C.S.§703(g). In her petition [Complainant] could advocate that customers be allowed to “opt out” of smart meter installation. However, such a petition for rescission or amendment would likely be futile as the Commission has interpreted current law to require smart meter installation. The Commission cannot regulate in violation of a statute.

47. Accordingly, based on current precedent, the Complainant is not entitled to relief under the law.

48. For the reasons set forth above, the Complainant’s Complaint should be dismissed as a matter of law.

**REQUEST FOR RELIEF**

WHEREFORE, for the reasons set forth above, PECO Energy Company respectfully requests that your Honorable Commission summarily dismiss the Complainant’s formal complaint, and all issues which were raised in the Complaint.

Respectfully submitted,



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Shawane L. Lee  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
(215) 841-6841  
Fax: 215.568.3389  
Shawane.Lee@exeloncorp.com

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>RENNEY THOMAS</b>	:	
<b>Complainant</b>	:	
<b>v.</b>	:	<b>DOCKET NO. C-2012-2336225</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

**VERIFICATION**

I, Shawane L. Lee, hereby declare that I am counsel for PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Pleading are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18 Pa. C.S. § 4904 pertaining to false statements to authorities.



Date: December 12, 2012

\_\_\_\_\_  
Shawane L. Lee

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>RENNEY THOMAS</b>	:	
<b>Complainant</b>	:	
v.	:	<b>DOCKET NO. C-2012-2336225</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

**CERTIFICATE OF SERVICE**

I, Shawane L. Lee, hereby certify that I have this day served a copy of PECO Energy Company's Answer in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Renney Thomas  
622 Kismet Road  
Philadelphia, PA 19115

Vernon A. McInnis, Esquire  
139 Tulpehocken Street  
Philadelphia, PA 19144

Dated at Philadelphia, Pennsylvania, December 12, 2012



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Shawane L. Lee  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
(215) 841-6841  
Fax: 215.568.3389  
Shawane.Lee@exeloncorp.com

# **EXHIBIT “1”**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

Please print in ink or type.

1. CUSTOMER (COMPLAINANT) INFORMATION

Your name, mailing address, county, telephone number, utility account number and service address:

Name RENNEY THOMAS

Street/P.O. Box 642 KISMET RD Apt #

City PHILADELPHIA State PA Zip 19115

County PHILADELPHIA

Daytime Telephone Number Where We Can Contact You: (267) 934 - 6084

E-mail Address (optional): renneyt@gmail.com

Utility Account Number 84873 - 01604 (from your bill)

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name

Street/P.O. Box

City State Zip

2. FULL NAME OF UTILITY COMPANY (RESPONDENT):

PECO

3. TYPE OF UTILITY (check one)

[X] ELECTRIC

[ ] STEAM HEAT

[ ] GAS

[ ] WASTE WATER

[ ] WATER

[ ] MOTOR CARRIER (e.g., taxi, moving company, limousine)

[ ] TELEPHONE (local, long distance)

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4. **COMPLAINT** (check one)

**A. In general, what is your complaint?**

- I want to oppose the company's proposed rate increase.
- There are incorrect charges on my bill.
- There is a reliability, safety or quality problem with my utility service.
- I received a notice that my utility service is being terminated.
- I would like a payment agreement.
- Other (explain).

**B. State the facts of your complaint.**

Include any specific dates, times or places that may be important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

Please see attachment.

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5. **RELIEF**

How do you want your complaint to be resolved? Use additional paper if you need more space.

Please see attachment.

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a billing problem, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety or welfare?

YES

NO

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES (includes appeals of BCS determinations)

NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

I called them but <sup>that</sup> threatened me with shutoff.

8. LEGAL REPRESENTATION (IF ANY)

If you are represented by a lawyer in this matter you must provide your lawyer's name, address, telephone number, and e-mail address, if known.

Lawyer's Name Vernon A. McInnis Esq.

Street 139 Tulpehocken St.

City Phila State PA Zip 19144

Area Code/Phone Number 215 - 844 7535

E-mail Address (If Known) witpennlaw@aol.com

**Facts of my complaint:**

1. Wife is pregnant in 3<sup>rd</sup> trimester.
2. New PECO meters are a fire hazard and have been known to spontaneously combust.
3. Due to late stage pregnancy and children in the house, evacuation may be hampered and lead to loss of life.
4. New PECO meter wirelessly communicates usage data at shorter intervals and hence increases the electromagnetic field exposure to the occupants inside the house. This includes mother and fetus.
5. The Smart Meter has two transmission devices: one cellular and one Wi-Fi. The Wi-Fi portion communicates with other Smart Meters in the neighborhood in a mesh network. The cellular transmitter transmits data to PECO.
6. The residential Smart Meter may act as a relay for the entire neighborhood and increase the duty cycle of the meter, further increasing the field exposure for the occupants of the residence.
7. The electromagnetic fields pose a threat to fetal brain development, genetic disorders, sleep disorders and birth defects. It will also disrupt normal cellular and physiological function.
8. See attached research papers titled 'Public health implications of wireless technologies – Cindy Sage, David O. Carpenter

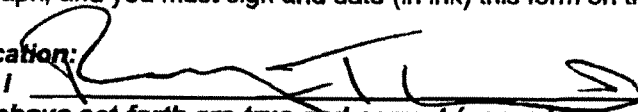
**Relief:**

- We would like to continue using the old meter indefinitely or provide one with that does not expose the occupant of this house to increased EMF.
- We would like to opt out from the installation of the new smart meter indefinitely.
- We would like PECO to continue to support and fix the old meter, if and when it malfunctions, indefinitely or provide one with that does not expose the occupant of this house to increased EMF.

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**9. VERIFICATION AND SIGNATURE**

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification:  hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

  
(Signature)

11-18-2012  
(Date)

\_\_\_\_\_  
Title of authorized employee or officer

**10. FILING**

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 <sup>nd</sup> Floor Harrisburg, Pennsylvania 17120
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Facsimiles and/or electronic filings of the complaint will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your complaint for your records.

PA P.U.C.  
SECRETARY'S BUREAU

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