

C-2015-2475355

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

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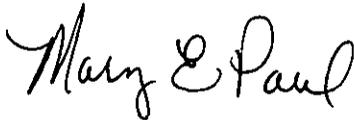
JUL 21 2015

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

With a copy to:

Shawane L. Lee  
PECO Energy Company  
2301 Market Street, S-23  
Philadelphia, PA 19103

Dated this 21st day of July, 2015.



Mary E. Paul

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mary Paul

v

PECO Energy Company (PECO)

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JUL 21 2015

PUC docket number C-2015-2475355

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Date: July 20, 2015

**Exceptions Of Mary Paul (Complainant)**

1. Page 5, page 10 #6, (52 Pa. Code section 703(b) - The Commission may dismiss any complaint without a hearing if, in its opinion, a hearing is *not in the public interest*.

What does “not in the public interest” mean here? Health and safety are in the public interest. The PA code, Title 66 If the matters I raised are not in the public interest I do not know what is. The “public” includes me as well. Public Interest is defined as *anything affecting the rights, health, or finances of the public at large*. Public interest is a common concern among citizens in the management and affairs of local, state, and national government. It does not mean mere curiosity but is a broad term that refers to the body politic and the public weal. A public utility is regulated in the public interest because private individuals rely on such a company for vital services. (See West’s Encyclopedia of American Law, edition 2. Copyright 2008 The Gale Group, Inc. All rights reserved.)

PECO is granted an easement for usage measuring devices for the purpose of billing electric and gas service supplied to the property. The easement obligates the utility company to **safeguard property and persons**, and to **act in good faith**.

Per the PA Energy Consumer Bill Of Rights, (and the PA Utility Code) as a customer my responsibilities include paying my bills on time and providing my utility access to their meters; and as a customer my rights include having **safe and reliable** service, and the right to **personal privacy**. My utility has the responsibility to safeguard my personal information and prevent unauthorized use

of the personal information. The PA Public Utility Code requires that every public utility create and maintain adequate, efficient, **safe and reasonable service and facilities**; to make necessary repairs and **improvements to service**. Further, the Public Utility Code, section 1501, every public utility shall furnish and maintain adequate, efficient, **safe and reasonable service and facilities**, and shall make all such repairs, changes, alterations, substitutions, extensions and improvements in or to such service and facilities as shall be necessary or proper for the **accommodation**, convenience, and **safety** of.....the public.

Has PECO acted in good faith? It is **reasonable** that after all the complaints and supporting documentation filed with the Commission against PECO, the subject of smart meters causing harm to people and to their property is known. It is a well-known fact in the industry responsible for providing testing and support of smart meter technology. (See supporting documentation below.)

I have researched the subject of smart meters and PECO has not fully informed the public regarding smart meter technology, including RF frequencies and emissions and their impact on people, animals, birds, insects and plants – indeed to all life. The FAQ sheets merely skirted these issues and **most importantly, never actually said they were safe**. Instead an “apples to oranges” comparison on PECO’s FAQ sheet was done regarding radiation from smart meters and that of other wireless devices. The high-density pulsed radiation of smart meters every couple of minutes, 24/7 is far more dangerous. Time- averaging of peak levels of RF pulses produced by smart meters hides the true levels of exposure that can far exceed the FCC upper limit.

Fires have been attributed to the Landis+Gyr meters, that PECO is now using after recalling thousands of Sensus meters due to fires. PECO refers to these incidents as “metering events.” More recently, fires attributed to smart meters happened in February 2013 in Tredyffrin Township where the meter bust into flames. The Fire Chief encouraged homeowners to have an electrician inspect the interior wiring once a smart meter is installed – a several hundred-dollar charge. Another happened at an apartment building in Bensalem, PA in February 2014 where the Landis+Gyr smart meter exploded and caught fire. See <http://smartgridawareness.org/2014/02/14/meter-blamed-for-pennsylvania-fire/>

This is happening all over the country and in other countries. Further, meters blowing up or being blown off houses. See <http://takebackyourpower.net/1000s-of-smart-meter-fires-new-whistleblower-court-evidence-video/>

Mass smart meter installations have increased with the pressure to install as many meters as possible and for installers to earn bonuses for the fast installs.

Installations are performed by technicians, not certified electricians/electrical engineers. The customers' meters are pulled under load. No certified electrician/electrical engineer would do this. Meter bases can be damaged. Electrical systems are compromised which endangers homeowners and property. Electrical maintenance should be done to ensure the eight connections in the meter base are clean and tight. Bad or loose connections can lead to high heating and arcing. Incidents have occurred that have damaged appliances and household wiring and caused fires.

To save money, the meters themselves are cheaply designed and built with plastic backplates that are more flammable, without surge arrestors, and with thinner blades. The remote disconnect feature is highly dangerous and can cause arcing inside the meter at extremely high temperatures at speeds of 700 mph and can cause a fire.

An industry leader for testing and support of metering equipment has presented these same issues causing meter failure. Whistleblowers have come forward with the same information. In addition to installing under load, other causes include high voltage surges where a vehicle hits a light or utility pole, lightning strikes, or a tree falling on a light pole. Extreme heat and cold and humidity also affect the integrity of the meter.

Electrical meters are close to gas lines and explosions can, and have occurred. See <http://takebackyourpower.net/1000s-of-smart-meter-fires-new-whistleblower-court-evidence-video/>

In PECO's Universal Deployment Plan, customer education and communications were important components. To my knowledge, I received nothing from PECO regarding this smart meter initiative nor did I receive any communication in the form of two letters and a phone call prior to the August 28, 2014 attempted installation by a Corix employee, as outlined in the Plan.

PECO has not met its legal obligation to fully inform its customers, both internal and external, regarding smart meter technology. Calls to PECO from myself and from my neighbors were met with either misinformation, including that the meters were safe.

Northeast Utilities, the largest utility in New England covering three states, was highly critical of a proposed state plan that would require utilization of smart meters in Massachusetts as part of a grid modernization plan in a filing

on January 17, 2014. The company stated, *“There is no rational basis for this technology.”* Northeast further stated, *smart meter costs cannot be justified; are not an appropriate technology platform for grid modernization; cyber-security issues prevent development of a suitable plan; smart meter technology may soon be rendered obsolete; and smart meters are not a good choice for consumers due to costs, invasion of privacy, and detrimental health effects.*

2. Top of page 2; page 7, page 8 Page 10, #7, and #8, I have not refused a smart meter as described in the footnotes. As a matter of fact, those meters were installed on my property at one time. They made me sick due to the wireless signals. PECO complied with my request to remove them for that reason. This proves the ‘smart’ meters were not mandated. The meters described in the footnote and in Act 129 are exactly what the legislators approved in 2008 and did not mandate as recorded in House and Senate Journals:

**Representative Saylor: “..it still needs to be a consumer choice, not a General Assembly mandate onto consumers that is going to cost them more in their electric bills.”**

**Representative Benninghoff: “I think it is important that we are smart about our energy use, but I also think we have to think about what government’s role is in mandating such a thing.”**

**Representative Gabig: “...but it is not going to be the utilities that pay for it because we took care of them in our amendment; they are taken care of in this Freeman amendment. The big utility companies and corporations, they are all right with it; they support this, but the customer, well, you are going to pay the freight for this mandate, this State mandate.”**

**Senator Tomlinson: “It also contains language in there that we will have smart meters. It is not mandated, but allows for the deployment of smart meters through a depreciation process, through new home construction process, and through the depreciation of 15 years, and for anyone who wants to purchase a smart meter which they feel will help them manage their electric load better.”**

**Senator Boscola: “We also made sure that smart meters would not be mandated for every single ratepayer.”**

**Senator Fumo: “In addition, we did not mandate smart meters, but we made them optional.”**

Per 66 Pa, C.S. section 2807(f), section 3 defines smart meters as metering technology that records electricity usage of at least an hourly basis and is capable

of providing customers with information on their hourly consumption and providing automatic control of a customer's consumption through bidirectional communication (2807(g)). At the time of the legislation, examples of such control would be increasing the thermostat setting during peak periods of hot weather and controlling the cycling of central air conditioner compressors. This is what was installed on my HVAC units and not on my electrical meter.

Industry has stated that the life of a smart meter is 15 years. The depreciation schedule as outlined in the Act is for the smart meter and not for the current meter on customer's property.

3. Pages 2 and 6, I have not stated I want to opt out. I have stated I do not consent to the kind of metering technology PECO wants to install on my property. The kind of technology is not what the legislators approved. The Commission seems to have added a new kind of meter to be installed on a customer's electrical meter and not on the HVAC unit, and has added capabilities of this kind of meter that are way beyond Act 129.

4. Page 3, page 8, page 10 #10, These radiation-emitting devices make people sick. Doctors and scientists from all over the world have presented evidence on this subject for years. See:

<https://www.emfscientist.org/index.php/emf-scientist-appeal>

<http://www.bioinitiative.org/table-of-contents/>

### **Recognition of the Electromagnetic Sensitivity as a Disability Under the ADA**

The Architectural and Transportation Barriers Compliance Board (Access Board) is the Federal agency devoted to the accessibility for people with disabilities. The Access Board is responsible for developing and maintaining accessibility guidelines to ensure that newly constructed and altered buildings and facilities covered by the Americans with Disabilities Act and the Architectural Barriers Act are accessible to and usable by people with disabilities. In November 1999, the Access Board issued a proposed rule to revise and update its accessibility guidelines. During the public comment period on the proposed rule, the Access Board received approximately 600 comments from individuals with multiple chemical sensitivities (MCS) and electromagnetic sensitivities (EMS).

The Board has taken the commentary very seriously and acted upon it. As stated in the Background for its Final Rule Americans with Disabilities Act (ADA) Accessibility Guidelines for Buildings and Facilities; Recreation Facilities that was published in September 2002:

**"The Board recognizes that multiple chemical sensitivities and electromagnetic sensitivities may be considered disabilities under the ADA if they so severely impair the neurological, respiratory or other functions of an individual that it substantially limits one or more of the individual's major life activities. The Board plans to closely examine the needs of this population, and undertake activities that address accessibility issues for these individuals".**

Following its recognition of electro sensitivity and its declaration of commitment to attend to the needs of the electromagnetic sensitive, the Access Board contracted the National Institute of Building Sciences (NIBS) to examine how to accommodate the needs of the electro sensitive in federally funded buildings. In 2005 the NIBS issued a report.

The link for the report:

[http://web.archive.org/web/20060714175343/ieq.nibs.org/ieq\\_project.pdf](http://web.archive.org/web/20060714175343/ieq.nibs.org/ieq_project.pdf)

From Report (page 11):

Electromagnetic Fields

For people who are electromagnetically sensitive, the presence of cell phones and towers, portable telephones, computers, fluorescent lighting, unshielded transformers and wiring, battery re-chargers, wireless devices, security and scanning equipment, microwave ovens, electric ranges and numerous other electrical appliances can make a building inaccessible. [Note: Smart meters emit RFs/EMFs in the microwave range.]

The National Institute for Occupational Safety and Health (NIOSH) notes that scientific studies have raised questions about the possible health effects of EMF's. NIOSH recommends the following measures for those wanting to reduce EMF exposure – informing workers and employers about possible hazards of magnetic fields, increasing workers' distance from EMF sources, using low-EMF designs wherever possible (e.g., for layout of office power supplies), and reducing EMF exposure times (11). [Smart meter exposure on a person's home is 24/7/365!]

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Below is a short 'bibliography' of information about the health problems associated with microwaves, RFs, and EMFs—the electronic means by which SMs transmit and receive data.

Canadian Medical Association Journal reports Health Canada's wireless limits are "A Disaster to Public Health"

<http://www.newswire.ca/en/story/1532755/canadian-medical-association-journal-reports-health-canada-s-wireless-limits-are-a-disaster-to-public-health>

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SM & EMF Health Problems

"Smart Meters" & EMR: The Health Crisis Of Our Time - Dr. Dietrich Klinghardt

[https://www.youtube.com/watch?feature=player\\_detailpage&v=b\\_wxM6lAF1I#t=458](https://www.youtube.com/watch?feature=player_detailpage&v=b_wxM6lAF1I#t=458)

Now that I know, I will be filing an Accommodation Letter with the Commission.

It is a principle of law that consumers have rights and there are no more fundamental rights than to be safe and secure in one's home, life and health. Therefore, I respectfully ask the Commission to regroup, rethink and do the morally and legally correct thing about SM implementation in Pennsylvania.

Sincerely,

*Mary E Paul*

Mary E. Paul



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JUL 21 2015

February 14, 2013

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

To Whom It May Concern,

This letter is written on behalf of the 14,000 global members of the Integrative Health Forum (IHF), an alliance of licensed healthcare professionals and concerned citizens whose goal is to empower others to assume responsibility for their health and that of their respective communities.

Having worked in the new independent States of the Former Soviet Union for over 15 years, specifically in the areas affected by the Chernobyl Accident of 1986, I am well aware of the long-term effects that toxicity plays in the health of our people, and especially vulnerable populations such as the young, the elderly, and the challenged. While this was clearly the world's worst nuclear disaster, the scope of the accident, Soviet secrecy about it, and the lack of general awareness have created questions that remain unanswered. When one visits an orphanage in Minsk, Belarus with over 800 children under the age of 14 with lymphomas and leukemias, all of whom have been affected by the 'accident', one wonders about the life and health outcomes and how to avoid exposure in future generations.

*I have an acute awareness of the need for education related to energy fields, Smart Meters, the body's responses to stressors in our environment, and what we can do to thrive and survive in today's society. As an educator and scientist, I created the **Energy Medicine** lecture series, a continuing medical education program that recognizes the emergence of a new and exciting branch of academic medicine. In doing so, we support the educational needs of health professionals and others to know more and to apply the knowledge base within their own practices.*

Our program has been approved by the American Academy of Family Practice (9.25 CME), the American Holistic Nurses Association (9 contact hours) and through CE Brokers for the State of Florida for all health disciplines. We are also approved for 11 PDAs by the National Certification Commission on Acupuncture and Oriental Medicine (NCCAOM), the Kentucky Board of Dentistry and by the National Certification Board for Therapeutic Massage and Bodywork. We are proud of our content, our affiliation with recognized providers/approvers of continuing education for professionals, and our faculty, including:

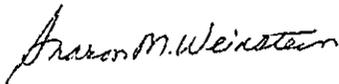
- Dr. Peter Goldberg, a board-certified Doctor of Acupuncture and practitioner of Energy Medicine specializing in stress and pain management.
- Dr. Ronald Lynch, a graduate of the University of Maryland school of Medicine who completed post-graduate training at Florida Hospital Center; he is board certified in anti-aging medicine and in natural medicine alternatives.

- Curtis Bennett, a world-renowned engineer, scientist and environmentalist who has dedicated his life to studying the invisible by using thermography to see images beyond our spectrum. He is an expert on the dangers of Smart Meters.
- Ted Aloisio, a nutritional microscopist and author of Blood Never Lies.
- Sharon Weinstein, a certified physical and environmental wellness specialist, author of B is for Balance and Workplace Wellness.

We have set the standard and raised the bar for exemplary education related to this important field; we plan to expand our offerings through 2014 to cities throughout North America in an effort to increase awareness, to examine electromagnetic energies and more subtle energies – from the dynamic infrastructure of the physical body.

As practitioners, we invite you to disseminate this letter and its message with those who share a passion for the field of Energy Medicine, whose concerns relevant to the environment and its impact on health and human happiness is as profound as ours, and to help us to educate others so that they too, may respond from a place of awareness.

Sincerely,



Sharon M. Weinstein, MS, RN, CRNI, FACW, FAAN  
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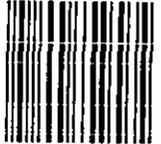
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