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November 27, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Alexia and Lawrence McKnight v. PECO Energy Company
Docket No. C-2017-2621057

Dear Secretary Chiavetta:

The *Exceptions of PECO Energy Company* in the above-referenced proceeding are attached for filing.

If you have any questions about this filing, please call me at 215.841.6863.

Very truly yours,



Ward L. Smith
Counsel for PECO Energy Company

WS/adz
Enclosures

c: Honorable Darlene D. Heep, ALJ
Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION


Alexia and Lawrence McKnight :
 :
 v. : Docket No. C-2017-2621057
 :
 PECO Energy Company :

CERTIFICATE OF SERVICE

I, Ward L. Smith hereby certify that I served a copy of PECO Energy Company's **Exceptions** in the above matter, upon all interested parties via email and overnight delivery to:

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Dated: November 27, 2018


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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Alexia and Lawrence McKnight	:	
	:	
v.	:	C-2017-2621057
	:	
PECO Energy Company	:	

Exceptions of PECO Energy Company

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Introduction

By Secretarial Letter served on October 24, 2018, the Commission issued the Initial Decision (“I.D.”) of Administrative Law Judge (“ALJ”) Darlene Heep in this matter. Pursuant to that Secretarial Letter, exceptions were originally due on November 13, 2018 (with reply exceptions due June 3, 2018). The McKnights subsequently requested an extension of time (to which PECO did not object). By Secretarial Letter issued on November 6, 2018, the Commission therefore established new filing dates of November 27, 2018 for exceptions and December 7, 2018 for reply exceptions. Pursuant to those Secretarial Letters and 52 Pa. Code §5.533, PECO hereby files its Exceptions to the I.D.

In this proceeding, Complainants Alexia and Lawrence McKnight argue that Mrs. McKnight has electrical hypersensitivity (“EHS”) and was harmed, and would be harmed, by exposure to electromagnetic fields (“EMF”) or radio frequency (“RF”) fields – which the I.D. sometimes collectively refers to as “EFs”¹ -- from PECO’s AMI meters. The I.D. correctly concluded (pp. 27-28) that “Substantial evidence does not support a finding that Mrs. McKnight suffers from EHS [Electromagnetic Hypersensitivity] that would be negatively affected or worsened if any AMI meter is installed. *See also*, I.D., p. 30, Conclusion of Law 9: “There is insufficient evidence to support a finding that Mrs. McKnight will be adversely affected by any smart meter or that PECO’s use of any smart meter will constitute unsafe or unreasonable service in violation of 66 Pa. C.S. § 1501, *Kreider v PECO Energy Co.*, Docket No. P-2015-2495064 at 23 (Order entered January 28, 2016) (citing *Woodbourne-Heaton*, 1992 Pa. PUC Lexis 160, at *12-13).”

¹ *See* I.D. p. 1, fn. 2. “Electromagnetic Fields” and “Radio Frequency Fields” were used interchangeably in these proceedings and will be referred to as EFs herein.

However, the I.D. reaches two conclusions to which PECO must except.

First, Conclusion of Law #8 (p. 30) states that “There is sufficient evidence to support a finding that Mrs. McKnight will be adversely affected by reinstallation of the Landis + Gyr AMI meter #127832547 and reinstallation of the Landis + Gyr AMI meter #127832547 would constitute unsafe or unreasonable service in violation of 66 Pa. C.S. § 1501, *Kreider v PECO Energy Co.*, Docket No. P-2015-2495064 at 23 (Order entered January 28, 2016) (citing *Woodbourne-Heaton*, 1992 Pa. PUC Lexis 160, at * 12-13).” While PECO is absolutely prepared to install a different AMI meter (such as an Aclara I210+ C AMI meter) at the McKnight residence – and plans to do so -- it nonetheless must challenge this Conclusion of Law. Simply, the record evidence does not support a finding that Mrs. McKnight was harmed by or would be harmed by reinstallation of the specific meter referenced in the I.D.

Second, the I.D. Orders (p. 31, Ordering Paragraph 3) “That PECO Energy Company shall investigate 258 Heyburn Road, Chadds Ford, Pennsylvania for any stray voltage or voltage to ground voltage issues within 30 days of the final order in this matter and that PECO Energy Company will correct any stray voltage or voltage to ground issues pertaining to PECO Energy Company equipment and facilities, if any exist, as soon as practicable.” Again, upon request by the McKnights PECO is perfectly willing and prepared to perform the noted stray voltage investigation and any necessary remediation. Indeed, it already conducted such a stray voltage investigation and remediation at this residence in 2017. But stray voltage was not at issue in this proceeding, and there is no record evidence to support an Order that PECO must proceed with another such investigation.

I. Exception 1: The I.D. incorrectly concludes that there is sufficient evidence to support a finding Mrs. McKnight was adversely affected by Landis + Gyr AMI meter #127832547 or would be adversely affected by reinstallation of it

PECO excepts to Conclusion of Law 8:

There is sufficient evidence to support a finding that Mrs. McKnight will be adversely affected by reinstallation of the Landis + Gyr AMI meter #127832547 and reinstallation of the Landis + Gyr AMI meter #127832547 would constitute unsafe or unreasonable service in violation of 66 Pa. C.S. § 1501, *Kreider v PECO Energy Co.*, Docket No. P-2015-2495064 at 23 (Order entered January 28, 2016) (citing *Woodbourne-Heaton*, 1992 Pa. PUC Lexis 160, at * 12-13).

In support of this Conclusion, the I.D. states (p. 27) (emphasis added) that:

There was evidence presented by the Complainants that Mrs. McKnight became ill after the Landis + Gyr meter #127832547 was installed at the service address. This was not rebutted by PECO. However, concurrently the McKnights were having a voltage problem at their residence, which PECO made every attempt to repair. *This suggests some interaction with that meter and the environment of the service address.*

The I.D. is correct that the McKnights testified that Mrs. McKnight became ill after the Landis + Gyr meter was installed. The I.D. is also correct that the McKnights did not prove that her illness was caused by EMF from the Landis + Gyr meter. *See* I.D., p. 27, p. 30, Conclusion of Law 9. What the I.D. does not make clear, however, is that there is no testimony in this proceeding to support the view that there was “some interaction” with PECO’s AMI meters *other than EMF* that caused or would cause Mrs. McKnight to have adverse health effects. Simply, the McKnights put on a case that Mrs. McKnight’s has EHS and that exposure to EMF affected her EHS, but failed to meet their burden of proof on that case. No unidentified “some interaction” between PECO’s Landis + Gyr AMI meter and the environment, other than the claimed EMF interaction, was discussed. Such an alternative claim certainly was not supported by the record evidence.

PECO will discuss the testimony of the witnesses in the same sequence as they were discussed in its Main Brief.

A. Mr. and Mrs. McKnight presented testimony only on EHS and possible EMF mechanisms that they believe could cause EHS; they did not present testimony regarding an unknown, unidentified interaction between PECO's Landis + Gyr meter and the environment

Mrs. McKnight testified that she has EHS. Apr 10 Tr. 18-24. According to Mrs. McKnight, her EHS is an immune reaction to exposure to EMF. Apr 10 Tr. 27. Mrs. McKnight postulated three mechanisms by which EMF from a PECO AMI meter could affect her. Apr 10 Tr. 43-46.

Mr. McKnight also testified that Mrs. McKnight has EHS. Apr 10 Tr. 102-110. Mr. McKnight also postulated the same three mechanisms by which EMF from a PECO AMI meter could affect Mrs. McKnight. Apr 10 Tr. 199-200.

But neither Mrs. McKnight nor Mr. McKnight presented any testimony regarding some other unnamed, unidentified interaction, other than the claimed EMF interaction, between PECO's Landis + Gyr AMI meter and the environment.

The I.D. correctly concludes that the McKnights did not carry their burden of proving that Mrs. McKnight has EHS, I.D., pp. 27-28; and that they did not carry their burden of proving that Mrs. McKnight would be adversely affected by PECO's AMI meters. I.D., p. 30, Conclusion of Law 9. The McKnights' testimony does not provide any record support for the conclusion that some other unnamed, unidentified interaction can or will occur between PECO's Landis + Gyr meter and the environment.

B. Russell Brocato testified that stray voltage is unrelated to meter type

The McKnights called as a witness Russell Brocato, a retired PECO employee who had worked on the stray voltage issue at the McKnight residence. PECO addresses his testimony at length in its second exception. For this first exception, however, PECO simply notes that, to the

extent that anyone concludes that the unnamed, unidentified environmental interaction discussed in the I.D. is “stray voltage,”² Mr. Brocato’s testimony does not support that view:

JUDGE HEEP: Also, *stray voltage arises from what?*

THE WITNESS: Stray voltage arises from loose connections, capacitance, balancing on the three phase.

JUDGE HEEP: *So, it's not directly related to the type of meter that you have?*

THE WITNESS: *No. I would say no.*

Apr 10, 2018 Tr. at 222 (emphasis added).

Mr. Brocato’s testimony thus does not support a finding that stray voltage is caused by meters or that it can properly be characterized as an interaction between PECO’s Landis + Gyr AMI meter and the environment.

C. Treating physician Dr. Prociuk’s testimony was exclusively focused on EMF, and does not provide any evidentiary support for the conclusion that there is an unnamed, unidentified interaction between PECO’s Landis + Gyr meter and the environment

The I.D. correctly states (p. 22) that “Dr. Prociuk’s concerns with the AMI meter are ‘entirely related to EMF.’ (April 11, Tr. 312).” The I.D. also correctly concludes that the Complainants did not carry their burden of proof regarding EMF and health. I.D., p. 27; p. 30, Conclusion of Law 9.

Dr. Prociuk made clear that his testimony does not support a finding regarding some other interaction between PECO’s Landis + Gyr meters and the environment. He stated that

² T.I.D., p. 27 (emphasis added): “There was evidence presented by the Complainants that Mrs. McKnight became ill after the Landis + Gyr meter #127832547 was installed at the service address. This was not rebutted by PECO. However, *concurrently the McKnights were having a voltage problem* at their residence, which PECO made every attempt to repair. *This suggests some interaction with that meter and the environment* of the service address.”

installation of an AMI meter would be medically contraindicated, and the ALJ asked him for the basis of that recommendation (Apr 11 Tr. at 312) (emphasis added):

ALJ Heep: Is [your conclusion re medical contraindication] pertaining to the smart meter because of EMFs or are you just concerned that the smart meter itself – there's something about the smart meter that's contrary to their health?

Dr. Prociuk: No. *It's entirely related to EMF. That is the whole health issue with respect to smart meter is the EMF. I'm unaware of any other factor with respect to the smart meter that is of concern.*

Simply, Dr. Prociuk provided no evidentiary support for a finding that there is an unknown, unidentified interaction between PECO's Landis + Gyr meter and the environment. More than that, his testimony affirmatively states that, to his knowledge, no such concern exists.

D. Complainants' electrical engineering expert William Bathgate testified that there is nothing unusual about the components used in AMI meters

Complainants' electrical engineering expert, Mr. William Bathgate, was not recognized as an expert on health issues. PECO Main Brief, p. 45. His testimony thus, perforce, could not support a finding that "some interaction" of PECO's AMI meters caused or will cause Mrs. McKnight to suffer adverse health effects.

With that said, Mr. Bathgate did provide testimony that, from an engineering viewpoint, all the circuit components used in AMI meters are similar from meter brand to meter brand, and that there "no unique circuit components that are not also used in many industrial control and power switching systems in the market today." Apr 11 Tr. 411-12. In other words, Mr. Bathgate's testimony supports the view, from an engineering perspective, that there is no unknown "other" in PECO's Landis + Gyr meter that is interacting with the environment in some unidentified way.

E. Treating physician Dr. Rea was exclusively focused on EMF and electrical hypersensitivity, and his testimony does not provide any evidentiary support for the conclusion that there is some unknown, unidentified interaction between PECO's Landis + Gyr meters and the environment

Dr. Rea was recognized as an expert in electrical hypersensitivity, or "EHS," Apr 12 Tr. 58, I.D. p. 7 – which he stated is also known as idiopathic environmental intolerance to EMF. Apr 12 Tr. 56-57. He testified that he had tested Mrs. McKnight for EHS by exposing her to EMF in a controlled environment and that he concluded that she is sensitive to exposure to EMF and has EHS. I.D., p. 8. After a review of all the evidence on EHS, however, the I.D correctly concludes (p. 19) that: "the evidence does not support a finding that . . . Mrs. McKnight suffers from EHS."

Dr. Rea did not provide testimony on subjects other than EMF exposure and EHS. Indeed, one can read his entire testimony without finding any questions regarding, or mention of, an unknown, unidentified interaction between PECO's Landis + Gyr AMI meter and the environment, or of any interaction (other than the claimed EMF interaction) between PECO's AMI meters and health. Apr 12 Tr.59-111. His testimony thus provides no evidentiary support for a finding that there is an unknown, unidentified interaction between PECO's Landis + Gyr meter and the environment.

F. PECO's witness Glenn Pritchard testified that there is nothing unusual about the components used in PECO's AMI meters

Glenn Pritchard is PECO's Manager of Advanced Grid Operations. Apr. 12 Tr. 141. Mr. Pritchard was recognized as an expert in the design, operation, and technology of Advanced Meter installations. Apr 12 Tr. 142-46.

By reviewing Functional Block Diagrams (PECO Exhibits GP-7 and GP-8), Mr. Pritchard demonstrated and concluded that, with small differences in power supply, the various

AMI meters are functionally the same across the various AMI meters (some AMI meters have a capacitor pump; others have a switch mode power supply), and that there are no functional differences between the existing AMR meters and AMI meters. Apr 12 Tr. 174-78.

As with the testimony of Complainants' witness Mr. Bathgate, this testimony supports the view that there is no unknown "other" in PECO's AMI meters that interacted with (or could interact with) the environment at the McKnight residence. *See also* PECO Main Brief, p. 28, Proposed Finding of Fact 149.

G. PECO's witness Dr. Chris Davis testified that there is nothing about any component in PECO's AMI meters that is capable of causing biological effects in people

Dr. Christopher Davis is a Ph.D. physicist who is the Minta Martin Professor of Engineering and Professor of Electrical and Computer Engineering at the University of Maryland. Apr. 13 Tr. 9-12. Dr. Davis was recognized as an expert in the fields of physics, biophysics, chemistry, electrical engineering, electromagnetics, bioelectromagnetics, and dosimetry. Apr. 13 Tr. 16, 18.

Dr. Davis has opened and examined PECO's AMI meters and all their components and testified that there is nothing in them that is capable of causing any biological effects in people. Apr 13 Tr. 76. This testimony runs directly contrary to the I.D.'s finding that there is an unidentified, unnamed aspect of PECO's Landis + Gyr AMI meter that is interacting with the environment at the McKnight residence in some unknown way.

H. PECO's witness Dr. Mark Israel did not provide any testimony that supports a finding that there is an unknown, unidentified interaction between PECO's Landis+Gyr meter and the environment

Mark Israel is a medical doctor who is Professor of Systems Biology and Pediatrics and Medicine at Dartmouth Medical School. He is also Executive Director of the Israel Cancer

Research Fund. Apr 13 Tr. 176-177. Dr. Israel was recognized as an expert in medicine, medical research, and radiofrequency and electromagnetic fields and health. Apr 13 Tr. 182-190.

Dr. Israel's expert opinion is that there is no reliable medical basis to conclude that radiofrequency fields from PECO's AMI meters did or will cause, contribute to, or exacerbate IEI, EHS, or any symptoms or medical conditions reported by Mrs. McKnight. Apr 13 Tr. 194-202; PECO Exh. MI-3.

Dr. Israel did not provide any testimony that would support a finding that there is an unknown, unidentified interaction between PECO's Landis + Gyr AMI meter and the environment at the McKnight residence.

I. It Would Be Bad Public Policy To Adopt the I.D. On This Issue

PECO believes that it has demonstrated, throughout these Exceptions, that the McKnights' case was focused on and limited to a claim that Mrs. McKnight has EHS and that exposure to EMF from PECO's AMI meters thus would cause Mrs. McKnight harm. Moreover, the I.D. correctly concluded that the McKnights failed to meet their burden of proving that claim. Unfortunately, the I.D. concluded that there is substantial evidence that there is "some interaction" between PECO's Landis +Gyr meter and the environment at the McKnight's service address.

PECO believes that the prior sections of these Exceptions have demonstrated why that conclusion should not be accepted as a matter of the record evidence in this proceeding. In addition, there is a policy consideration that the Commission should consider. Put most bluntly, the I.D. is recommending that if a complainant truly believes that they are being harmed by a

utility facility -- if the complainant subjectively and sincerely testifies that they feel sick when they are near the facility and feel better when they are away from it – that testimony is sufficient to support a finding that the facility is in some way interacting with the environment as to that complainant, and that it is thus unreasonable utility service for the utility to locate that facility near the customer.

Under that rule, a complainant can fail to meet their burden of proving that there is a scientific/medical basis for their concern, but still win their case merely by testifying that they experience a variance in good and bad feelings with changing proximity to utility facilities. And, if that is the rule, then the following claims can be won without scientific/medical proof that the utility facility is causing any harm whatsoever:

- “Every time I walk by your substation in my neighborhood, I feel ill. Please move it.”
- “Your transmission line along my property line makes me feel ill. Please move it.”
- “That transformer that provides electricity to my house makes me sick. Move it.”
- “Those aerial distribution lines along the street in front of my house make me sick whenever I go near them. Put them underground.”
- “When smart meters in my neighborhood transmit, I can feel it in my home and it doesn’t feel good. Stop transmitting.”

PECO does not believe it is being hyperbolic in describing this risk. Over the years, many people have suggested that utilities should reconfigure their utility systems to increase proximity from a given complainant. The controlling factor that keeps such claims from causing a wholesale reconfiguration of the utility system is the requirement that the complainant must

prove that they harm they fear will actually occur (by a preponderance of the evidence). The approach suggested by the I.D. largely or wholly eliminates that controlling factor. If adopted by the Commission as a rule of the necessary level of evidentiary proof, it would allow the claims set forth above to prevail simply on the basis of complainant testimony that they feel sick when in proximity to a utility facility. PECO respectfully, but strongly, urges the Commission not to go down that path.

II. Exception 2: The record evidence does not support the direction of Ordering Paragraph #3 regarding a stray voltage investigation and remediation

As noted, Ordering Paragraph #3 directs PECO to conduct a stray voltage investigation at the McKnight residence and to conduct remediation on PECO's facilities, if any is needed. PECO performs such investigations and remediation upon customer request and is happy to do so for the McKnights. Indeed, the record evidence in this proceeding establishes that the McKnights called PECO in March 2016 to report that they had a stray voltage issue; that PECO fielded personnel to investigate and remediate stray voltage; that the PECO personnel found a stray voltage issue existed at the residence; that the stray voltage issue was nothing extraordinary or unusual; that PECO did remediate the stray voltage problem at the McKnight residence; that stray voltage is not related the type of meter that is installed, and that everyone considered the stray voltage problem to be solved and to not be a part of this proceeding. But there was no evidence to suggest that a stray voltage problem still exists or that stray voltage needs to be investigated or remediated.

The key testimony on stray voltage was:

Testimony of Mrs. McKnight:

JUDGE HEEP: You mentioned in your complaint and you also testified regarding a stray voltage issue?

THE WITNESS: Yes.

JUDGE HEEP: Is that a separate concern that you have regarding your service from PECO?

THE WITNESS: *It's not really a concern. It's not part of this complaint. . . . That was in March 2016; so, that's when I reported the stray voltage to PECO, March 21, 2016 and that was addressed.*

April 10, 2018 Tr. at 19-20 (emphasis added)

Testimony of Mr. McKnight:

Q. I just want to make sure. *The stray voltage issue has been resolved?*

A. *To my knowledge, yes.*

April 10, 2018 Tr. at 43 (emphasis added).

[W]e agree [with] PECO that *the stray voltage as a total issue is solved.*

Apr. 10, 2018 Tr. at 150 (emphasis added).

JUDGE HEEP: What's your understanding of what caused the stray voltage problem and *was it resolved?*

THE WITNESS: From my understanding, *the situation is resolved* and Russell Brocato can probably tell you a lot more details or Mr. Bathgate.³

April 10, 2018 Tr. at 87 (emphasis added).

Testimony of Russell Brocato (retired PECO lineman)

JUDGE HEEP: What type of situation [did you work on at the McKnight residence]?

THE WITNESS: The stray voltage and [I] would try to explain that there are other tests that PECO does and requires; so, this was not an unusual case. We test for voltage fields around a lot of different places for a lot of different people and a lot of different circumstances.

JUDGE HEEP: But you testified there's nothing extraordinary about this particular situation?

³ Mr. Bathgate did not testify regarding stray voltage.

THE WITNESS: No, not extraordinary, not at all. It was a routine job and the fact we see these, we get these reports all the time.

April 10, 2018 Tr. at 218.

JUDGE HEEP: Also, stray voltage arises from what?

THE WITNESS: Stray voltage arises from loose connections, capacitance, balancing on the three phase.

JUDGE HEEP: So, it's not directly related to the type of meter that you have?

THE WITNESS: No. I would say no.

Apr 10, 2018 Tr. at 222.

If the McKnights are still having stray voltage problems, they can contact PECO and it will field personnel to do an additional investigation and remediation on PECO equipment, if any is needed. That is PECO's practice completely unrelated to this litigation or any claims made in it. As Mr. Brocato, who is a retired PECO lineman, noted: "We test for voltage fields around a lot of different places for a lot of different people and a lot of different circumstances." That offer is open to the McKnights as a normal business practice.

But the testimony in this case established that the McKnights did not face an unusual stray voltage situation, and that the stray voltage situation that they reported in 2016 has been resolved. The record evidence in this case thus does not justify ordering PECO to conduct an additional stray voltage investigation and remediation.

II. Conclusion

PECO respectfully submits that, on the record evidence in this proceeding, the Commission should find that there is no record evidence to support the finding that there is an unknown, unidentified interaction between PECO Landis + Gyr meter #127832547 and the environment at the McKnight residence. Moreover, the record evidence does not support a finding that there is a stray voltage issue at the McKnight residence that requires additional investigation and remediation. PECO therefore submits that the Commission should conclude that the use of AMI meters to provide service to Complainants is safe and reasonable utility service for purposes of 66 Pa. C.S. §1501. The Commission should reject the portions of the I.D. to which PECO has excepted, while adopting the remainder of the I.D.

Respectfully submitted,



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