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File #: 167945

September 3, 2019

***VIA ELECTRONIC FILING***


Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Paul J. Olshefski, Jr. v. PPL Electric Utilities Corporation**  
**Docket No. C-2019-3008990**

Dear Secretary Chiavetta:

Enclosed for filing is PPL Electric Utilities Corporation's Motion to Compel in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/dmc  
Enclosures

cc: Honorable Elizabeth Barnes (*w/enclosures*)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### VIA EMAIL & FIRST CLASS MAIL

Paul J. Olshefski, Jr.  
63 Dotyville Road  
Stillwater, PA 17878  
[rocnrol@epix.net](mailto:rocnrol@epix.net)

Date: September 3, 2019

A handwritten signature in black ink, appearing to read "D. Ryan", written over a horizontal line.

Devin T. Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Paul J. Olshefski, Jr.,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2019-3008990
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

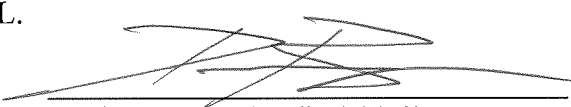
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**NOTICE TO PLEAD**

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YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Date: September 3, 2019

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Paul J. Olshefski, Jr.,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2019-3008990
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

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**MOTION OF PPL ELECTRIC UTILITIES CORPORATION TO  
COMPEL RESPONSES TO  
DISCOVERY PROPOUNDED ON PAUL J. OLSHEFSKI, JR. – SET I**

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TO ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:

Pursuant to 52 Pa. Code §§ 5.342(g) and 5.349(d), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Motion to Compel Responses to Discovery Propounded on Paul J. Olshefski, Jr. (“Complainant”) – Set I. In support of its Motion, PPL Electric states as follows:

**I. INTRODUCTION**

1. On July 19, 2019, PPL Electric served Interrogatories and Requests for Production of Documents on the Complainant – Set I (“PPL to Complainant Set I”) via email and first class mail. A true and correct copy of PPL to Complainant Set I is attached hereto and marked as **Appendix A**.

2. Pursuant to the Commission’s regulations, objections to PPL to Complainant Set I were due on or before July 29, 2019, and responses were due on or before August 8, 2019.

3. The Complainant never served any objections to PPL to Complainant Set I by July 29, 2019.

4. On August 9, 2019, PPL Electric agreed to give the Complainant an extension until August 15, 2019, to provide his responses to PPL to Complainant Set I.

5. On August 15, 2019, the Complainant served his responses to PPL to Complainant Set I. However, the Complainant refused to provide or did not provide the information and materials requested in PPL to Complainant Set I, Questions 2, 3, and 4. A true and correct copy of the Complainant's responses PPL to Complainant Set I is attached hereto and marked as **Appendix B**.

6. On August 16, 2019, counsel for PPL Electric left the Complainant a detailed voicemail about, among other things, the deficiencies with the discovery responses.

7. On August 19, 2019, the Complainant's wife called counsel for PPL Electric and informed him that they stood by not providing the information as requested in PPL to Complainant Set I, Questions 2, 3, and 4.

8. To date, the Complainant has never sent complete responses to PPL to Complainant Set I, Questions 2, 3, and 4.

## **II. MOTION TO COMPEL**

9. PPL Electric requests that Administrative Law Judge Elizabeth H. Barnes ("ALJ") compel responses to PPL to Complainant Set I, Questions 2, 3, and 4.

10. Under 52 Pa. Code § 5.321(c), a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated to lead to the discovery of admissible evidence. Discovery is permitted regardless of whether the information sought "relates to the claim or defense of the party seeking discovery or to the claim or defense of another party." *Id.*

11. Objections to interrogatories and requests for production of documents must be served within 10 days of the date the discovery was served. 52 Pa. Code §§ 5.342(e), 5.349(d).

Objecting parties remain under an obligation to provide timely answers to interrogatories or subparts of interrogatories to which they did not object. *Id.* § 5.342(f). Further, objections must be contained in a document separate from an answer. *Id.* §§ 5.342(c), 5.349(d).<sup>1</sup>

12. Answers to written interrogatories must “[a]nswer each interrogatory fully and completely unless an objection is made.” *Id.* § 5.342(a)(4). Answers must be served within 20 days after service of the interrogatories. *Id.* § 5.342(d).

13. Similarly, a party shall serve a response to a request for documents within 20 days after the service of the request. *Id.* § 5.349(d). The requesting party may move to compel a response to a request for documents with respect to a failure to respond to the request. *See id.*

14. As explained herein, the Complainant has failed to comply with the Commission’s discovery rules by failing to provide full and complete responses to PPL to Complainant Set I, Questions 2, 3, and 4 and produce the documents sought by these requests.

15. For the reasons stated in more detail below, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Questions 2, 3, and 4. Moreover, should the ALJ grant PPL Electric’s Motion to Compel and the Complainant fail to timely provide full and complete responses to Complainant Set I, Questions 2, 3, and 4, PPL Electric intends to file a Motion for Sanctions pursuant to 52 Pa. Code §§ 5.371(a) and 5.372(a).

**A. PPL TO COMPLAINANT SET I, QUESTION 2**

16. PPL to Complainant-I-2 requests the following:

Please identify all wireless phones, cellphones, microwaves, wireless routers, wifi networks, tablets, computers, Bluetooth speakers, wireless security systems, smart speakers (*e.g.*, Amazon Echo), garage door openers, baby monitors, and walkie talkies that are contained in or used in the house.

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<sup>1</sup> The Complainant did not serve objections to discovery. Therefore, Complainant’s failure to provide full and complete responses to discovery requests operate, in effect, as untimely objections.

17. The Complainant's response to PPL to Complainant-I-2 states:

This information is not applicable to my complaint and I consider sharing this information to be an invasion of my privacy.

18. As explained above, Section 5.342(a)(4) requires a party to fully and completely answer an interrogatory. 52 Pa. Code § 5.342(a)(4). In addition, a party has a duty to amend its prior responses to discovery requests when the information contained therein is incomplete. *Id.* § 5.332(2).

19. The response served by the Complainant was non-responsive and incomplete because he claimed that the question is "not applicable" to his Complaint and that "sharing this information" would "be an invasion of [his] privacy."

20. However, the deadline to serve any objections was July 29, 2019.

21. The Complainant's response was served on August 15, 2019.

22. Therefore, the Complainant waived his right to object to this interrogatory.

23. Moreover, the information requested about Complainant's exposure to other devices that emit radio frequency ("RF") fields is highly relevant to the issues raised in the case.

24. The Complainant claims that he has health concerns about RF fields from AMI meters. As the testimony of PPL Electric's expert witness on RF exposures – Dr. Christopher Davis – will demonstrate, however, the RF exposure received from use of a cell phone and other devices is far higher than from an AMI meter.

25. PPL Electric is entitled to show how the RF exposures from the Complainant's devices and appliances compare to those from the AMI meter.

26. For these reasons, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Question 2.

**B. PPL TO COMPLAINANT SET I, QUESTION 3**

27. PPL to Complainant-I-3 requests the following:

Please state whether you or any member of your household uses a cell phone. If so, please provide the make and model of each cell phone and, for each phone identified, provide 12 months of phone bills or other records of actual cell phone usage.

28. The Complainant's response to PPL to Complainant-I-3 states:

This information is not applicable to my complaint and I consider sharing this information to be an invasion of my privacy.

29. As explained above, Section 5.342(a)(4) requires a party to fully and completely answer an interrogatory. 52 Pa. Code § 5.342(a)(4). In addition, a party has a duty to amend its prior responses to discovery requests when the information contained therein is incomplete. *Id.* § 5.332(2).

30. The response served by the Complainant was non-responsive and incomplete because he claimed that the question is "not applicable" to his Complaint and that "sharing this information" would "be an invasion of [his] privacy."

31. However, the deadline to serve any objections was July 29, 2019.

32. The Complainant's response was served on August 15, 2019.

33. Therefore, the Complainant waived his right to object to this interrogatory.

34. Moreover, the information requested about cell phone use is highly relevant to the issues raised in this case.

35. The Complainant claims that he has health concerns about RF fields from AMI meters. As the testimony of PPL Electric's expert witness on RF exposures – Dr. Christopher Davis – will demonstrate, however, the RF exposure received from use of a cell phone (or even standing within 30 feet of another person using a cell phone) is far higher than from an AMI meter.

36. PPL Electric is entitled to: (1) show how the RF exposures from the cell phone use compare to those from the AMI meter; and (2) discover the billing records needed to quantify the amount of time that the Complainant chooses to use the phone.

37. Based on the foregoing, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Question 3.

**C. PPL TO COMPLAINANT SET I, QUESTION 4**

38. PPL to Complainant-I-4 requests the following:

- (a) Please state every health condition you claim was caused by a smart meter or will be caused or worsened by the installation of PPL Electric's new smart meter.
- (b) Please provide the date that every health condition identified in subpart (a) began.
- (c) Please provide copies of all your medical records of every health condition identified in subpart (a).
- (d) For each alleged health condition that you do not have medical records for in response to subpart (c), please state whether such condition was diagnosed by a medical professional. If so, please provide the name, address, and telephone number of the medical professional and the date of the diagnosis.
- (e) For each of the alleged health conditions identified in subpart (a), please state whether you have been prescribed any therapy or treatment for the condition by a medical professional. If so, please identify the therapy or treatment, provide the name, address, and telephone number of the prescribing medical professional, and provide the date the therapy or treatment was prescribed.

39. The Complainant's response to the question states:

As stated in the original complaint, my concern is the risk of future health issues caused by the smart meter. I did not indicate that the smart meter "has" caused health issues. As the smart meter has not yet been installed, I have not claimed it to have caused any issues to date.

40. As explained above, Section 5.342(a)(4) requires a party to fully and completely answer an interrogatory. 52 Pa. Code § 5.342(a)(4). In addition, a party has a duty to amend its prior responses to discovery requests when the information contained therein is incomplete. *Id.* § 5.332(2).

41. The response served by the Complainant was non-responsive and incomplete.

42. The Complainant alleges that the new AMI meter will cause, contribute to, or exacerbate adverse health effects.

43. Therefore, the Complainant's medical records and conditions are highly relevant to this case.

44. Moreover, the Complainant erroneously claims that this interrogatory only seeks information about the health conditions that the Complainant alleges have been caused by PPL Electric's new AMI meter.

45. In actuality, the interrogatory also requests information about "every health condition" that the Complainant alleges "will be caused or worsened by the installation" of the new AMI meter.

46. The Complainant should be directed to provide a full and complete response to this interrogatory.

47. For these reasons, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Question 4.

### **III. NOTICE OF INTENT TO SEEK SANCTIONS**

48. Upon the motion of a party, the presiding officer may make an appropriate order for sanctions if a party fails to answer or otherwise respond to a discovery request or refuses to obey an order of the presiding officer respecting discovery. *See* 52 Pa. Code § 5.371(a).

49. In ruling upon a motion for sanctions, the presiding officer may, among other things, issue: (1) “[a]n order that the matters regarding which the questions were asked, the character or description of the thing or land, the contents of the paper, or other designated fact shall be taken to be established for the purposes of the action in accordance with the claim of the party obtaining the order”; (2) [a]n order refusing to allow the disobedient party to support or oppose designated claims or defenses, or prohibiting the party from introducing in evidence designated documents, things or testimony”; and (3) “[a]n order striking out pleadings or parts thereof, staying further proceedings until the order is obeyed, or entering a judgment against the disobedient party or individual advising the disobedience.” *Id.* § 5.372(a)(1)-(3).

50. If the Complainant fails to provide full and complete responses to PPL Electric’s discovery requests in sufficient time before the October 17, 2019 hearing, PPL Electric will be deprived of a reasonable opportunity to prepare for the hearing and respond to the Complainant’s claims.

51. Accordingly, the Company respectfully requests that if the Complainant fails to produce the information and documents related to any of his claims by October 3, 2019, then the Complainant should be barred from litigating the corresponding claim(s).

52. For example, if the Complainant fails to produce his medical records to verify the existence of any claimed medical conditions or issues, then the Complainant would be precluded from litigating claims that the installation of PPL Electric’s AMI meter would cause, contribute to, or exacerbate adverse health effects.

53. Similarly, if the Complainant fails to produce information about his current exposure to RF fields as requested in Questions 2 and 3, including but not limited to bills showing the extent of his cell phone use, then the Complainant would be precluded from

litigating claims that PPL Electric's AMI meter would expose him to unreasonable levels of RF fields.

54. Finally, to the extent that this Motion is granted and the Complainant fails to answer fully PPL to Complainant Set I, or otherwise comply with the ALJ's order, PPL Electric intends to file an appropriate motion pursuant to 52 Pa. Code §§ 5.371(a) and 5.372(a) to dismiss the Complaint with prejudice.

55. The Commission has regularly dismissed AMI meter complaints with prejudice due to the complainants' failure to answer discovery in compliance with the presiding administrative law judge's orders granting motions to compel. *See, e.g., Carol Sojda & Carol Lutzkanin v. Metropolitan Edison Co.*, Docket No. C-2017-2638350, pp. 7-8 (Jan. 9, 2019), *adopted*, Docket No. C-2017-2638350 (Order entered Mar. 28, 2019); *Kimberly Beckmann v. Metropolitan Edison Co.*, Docket No. C-2017-2613702, pp. 7-10 (Jan. 31, 2019), *adopted*, Docket No. C-2017-2613702 (Order entered Apr. 11, 2019); *Darlene Stanton v. Pennsylvania Electric Co.*, Docket No. C-2018-3001144, pp. 6-11 (May 10, 2019), *adopted*, Docket No. C-2018-3001144 (Order entered July 11, 2019); *Diana Cook v. West Penn Power Co.*, Docket No. C-2018-3003051, pp. 6-10 (May 1, 2019), *adopted*, Docket No. C-2018-3003051 (Order entered July 11, 2019).

56. Therefore, to the extent that this Motion is granted and the Complainant fails to answer fully PPL to Complainant Set I, or otherwise comply with the ALJ's order, PPL Electric intends to file an appropriate Motion for Sanctions pursuant to 52 Pa. Code §§ 5.371(a) and 5.372(a).

**IV. CONCLUSION**

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Elizabeth H. Barnes grant this Motion to Compel Responses to Discovery and direct Paul J. Olshefski, Jr. to answer fully PPL to Complainant Set I, as described above within three (3) days from the date of the order.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
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E-mail: [kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

Devin T. Ryan (ID # 316602)  
Garrett P. Lent (ID # 321566)  
Post & Schell, P.C.  
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Date: September 3, 2019

Attorneys for PPL Electric Utilities Corporation

# **APPENDIX A**

## **Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Paul J. Olshefski, Jr. – Set I**



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Devin Ryan

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717-612-6052 Direct  
717-731-1981 Direct Fax  
File #: 167945

July 19, 2019

*VIA E-MAIL (ROCNROL@EPIX.NET) & FIRST CLASS MAIL*

Paul J. Olshefski, Jr.  
63 Dotyville Road  
Stillwater, PA 17878

**Re: Paul J. Olshefski, Jr. v. PPL Utilities Corporation**  
**Docket No. C-2019-3008990**

Dear Mr. Olshefski:

Enclosed are the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Paul J. Olshefski, Jr. – Set I in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Please provide answers to the enclosed discovery within twenty (20) days of the date of service, pursuant to 52 Pa. Code § 5.342.

Sincerely,

Devin Ryan

DTR/dmc  
Enclosures

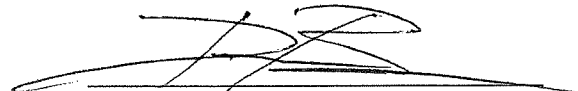
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA EMAIL & FIRST CLASS MAIL**

Paul J. Olshefski, Jr.  
63 Dotyville Road  
Stillwater, PA 17878  
[rocrol@epix.net](mailto:rocrol@epix.net)

Date: July 19, 2019



Devin T. Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Paul J. Olshefiski, Jr.,	:	
	:	
Complainant	:	
	:	
v.	:	Docket No. C-2019-3008990
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent	:	

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**INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS PROPOUNDED BY  
PPL ELECTRIC UTILITIES CORPORATION ON  
PAUL J. OLSHEFISKI, JR. – SET I**

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Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, PPL Electric Utilities Corporation (“PPL Electric”) propounds the following Interrogatories and Requests for Production of Documents (hereinafter, “discovery requests”) on Paul J. Olshefiski, Jr. (“Complainant”) – Set I.

**INSTRUCTIONS AND DEFINITIONS**

1. The “Responding Party,” “you,” or “your” means the party to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these discovery requests to attach a copy of each such document to the answers hereto and reference said document in the particular interrogatory to which the document is responsive.

6. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or

any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. "Communication" means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

8. "Date" means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

9. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

10. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

11. The answers provided to these discovery requests should first restate the question asked and identify the person(s) supplying the information.

12. In answering these discovery requests, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party's attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party's own knowledge. If any of the discovery requests cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party's inability to answer the remainder, and stating whatever information the Responding

Party has concerning the unanswered portions. If the Responding Party's answer is qualified in any particular, please set forth the details of such qualification.

13. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

14. If the Responding Party objects to part of a discovery request and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that discovery request. If the Responding Party objects to the scope or time period of a discovery request and refuses to answer for that scope or time period, state the Responding Party's objection and answer the discovery request for the scope or time period that the Responding Party believes is appropriate.

15. If, in connection with a discovery request, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

16. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and (c) the basis on which the privilege or other protection from disclosure is claimed.

17. As set forth in 52 Pa. Code § 5.342(g), these discovery requests are continuing, and the Responding Party is obliged to change, supplement, and correct all answers given to conform to new or changing information.

18. “Formal Complaint” means the Formal Complaint filed by the Complainant at Docket No. C-2019-3007408.

**INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS PROPOUNDED ON  
PAUL J. OLSHEFISKI, JR. – SET I**

PPL to Complainant-I-1

Re: Formal Complaint.

- (a) Please explain in detail the reasons why you are challenging the Company's installation of the new smart meter.
- (b) Please describe in detail all health concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (c) Please describe in detail all safety concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (d) Please describe in detail all privacy concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (e) Please describe in detail all reasons you believe the Company's new smart meter violates the law.

PPL to Complainant-I-2

Please identify all wireless phones, cellphones, microwaves, wireless routers, wifi networks, tablets, computers, Bluetooth speakers, wireless security systems, smart speakers (*e.g.*, Amazon Echo), garage door openers, baby monitors, and walkie talkies that are contained in or used in the house.

PPL to Complainant-I-3

Please state whether you or any member of your household uses a cell phone. If so, please provide the make and model of each cell phone and, for each phone identified, provide 12 months of phone bills or other records of actual cell phone usage.

PPL to Complainant-I-4

- (a) Please state every health condition you claim was caused by a smart meter or will be caused or worsened by the installation of PPL Electric's new smart meter.
- (b) Please provide the date that every health condition identified in subpart (a) began.

- (c) Please provide copies of all your medical records of every health condition identified in subpart (a).
- (d) For each alleged health condition that you do not have medical records for in response to subpart (c), please state whether such condition was diagnosed by a medical professional. If so, please provide the name, address, and telephone number of the medical professional and the date of the diagnosis.
- (e) For each of the alleged health conditions identified in subpart (a), please state whether you have been prescribed any therapy or treatment for the condition by a medical professional. If so, please identify the therapy or treatment, provide the name, address, and telephone number of the prescribing medical professional, and provide the date the therapy or treatment was prescribed.

PPL to Complainant-I-5

Please identify each person you plan to call as a fact witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
- (c) Provide the source(s) of information relied upon or referenced by the witness.

PPL to Complainant-I-6

Please identify each person you plan to call as an expert witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify;
- (c) Provide the source(s) of information relied upon or referenced by the witness; and
- (d) Provide a copy of the expert witness's current curriculum vitae.

PPL to Complainant-I-7

Please provide copies of all exhibits you intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of your direct case, please identify the witness who will be sponsoring the exhibit.

# **APPENDIX B**

## **Paul J. Olshefski, Jr.'s Answers to PPL Electric Utilities Corporation's Interrogatories and Requests for Production of Documents – Set I**

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS PROPOUNDED ON PAUL J. OLSHEFISKI, JR-SETI**

PPL to Complainant-I-1

Re: Formal Complaint.

- (a) Please explain in detail the reasons why you are challenging the Company's installation of the new smart meter.
- (b) Please describe in detail all health concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (c) Please describe in detail all safety concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (d) Please describe in detail all privacy concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (e) Please describe in detail all reasons you believe the Company's new smart meter violates the law.

RESPONSE:

Smart Meter Installation and equipment on utility pole outside my residence.

In February 2019 I became aware of a new piece of equipment on the utility pole outside of my residence at 63 Dotyville Road, Stillwater, PA. I began to make inquiries as to what it is and what it does.

I contacted PPL via telephone and then by mail.

Through other research I began to believe that it is equipment that communicates with smart meters. Then on March 12, 2019 I received a letter from PPL about replacement of meters. On March 13, 2019 I was contacted by a PPL person named Jachin Spotts who when asked about the equipment on the pole, said that it had to do with smart meter readings. I posed several questions about the equipment to which he had no answers. In fact, he only knew it had to do with smart meters, nothing else such as product name, make, how it works, ie transmits or receives or where I could find further information on said equipment.

Jachin from PPL told me he would look into this and get back to me on this equipment. During this phone call I told Jachin about the letter I received and stated I do not want a smart meter on my house, referring to my concerns about safety and was told I had no choice. There is no opt-out program in Pennsylvania.

Later the same day Jachin called back and said he sent me an email as to what the equipment was on the pole, but no email arrived. Jachin said he would not be

available for a few days. Monday, March 25 I followed up and received some PPL propaganda information regarding new electric meters, nothing about the equipment on the pole.

He said someone from metering would contact me. On March 20, Donald Vinciguerra phoned to discuss the issue, and sent a link to the manufacturer's website regarding the equipment on the pole.

I do not want a smart meter on my house for several reasons.

1. Title 66 section 1501 pertains to safety. These meters clearly violate safety with the elimination of surge protection. Any type of line surge could cause a fire in the meter itself or in the home's wiring. Fire is a very serious issue with said meters. There have been hundreds of cases where smart meters have been proven to be the cause of fires. Documentation can be provided to back this claim. I am not willing to risk losing my house by having a smart meter. I live in a very rural area miles from the local volunteer fire company.
2. Wireless radiation is emitted by smart meters known as radiofrequency waves (RF) which produces microwave radiation the same type as your cell phone (EMF radiation) only at much higher levels. (EMF) radiation has been linked to many human illnesses and is considered by the World Health Organization as a possible carcinogen. There are many studies about the adverse effects of EMF radiation, mentioned are just a few.

US Department of the Interior stated this type of radiation is harming wildlife.

Martin Blank, phd, research of electromagnetic fields states that this radiation breaks the bonds of DNA, a precursor to cancer.

University of California at Santa Cruz professor of Nuclear Policy shows the whole body cumulative radiation exposure from wireless meters is 100-160 times more than cell phones.

Robert Kane, phd, a Motorola Electrical Engineer said exposure to cell phones causes "tissue destruction in one's brain may be occurring without the slightest indication that anything is happening. And the damage may be repeated over and over again each time the energy exposure takes place" with pulsed electromagnetic fields (RF and dirty electricity). The exposure is thousands of times a day in millisecond blasts.

There are thousands of scientific studies showing deleterious effects of pulsed electromagnetic radiation on the body. I am able to show many studies by people with qualifying credentials relating to the hazards of smart meters and dirty electricity, and related equipment upon request.

3. Smart meters individually identify electrical devices and record when they are operated, causing invasion of privacy.
4. Smart meters monitor household activity and occupancy in violation of

rights and domestic privacy.

5. By intentional transmission and/or incidental disruption of house current, digital meters emit cancer-causing electromagnetic radiation, which violates laws against public endangerment, assault and commission of bodily harm.

#### PPL to Complainant-I-2

Please identify all wireless phones, cellphones, microwaves, wireless routers, wifi networks, tablets, computers, Bluetooth speakers, wireless security systems, smart speakers (*e.g.*, Amazon Echo), garage door openers, baby monitors, and walkie talkies that are contained in or used in the house.

RESPONSE:

This information is not applicable to my complaint and I consider sharing this information to be an invasion of my privacy.

#### PPL to Complainant-I-3

Please state whether you or any member of your household uses a cell phone. If so, please provide the make and model of each cell phone and, for each phone identified, provide 12 months of phone bills or other records of actual cell phone usage.

RESPONSE:

This information is not applicable to my complaint and I consider sharing this information to be an invasion of my privacy.

#### PPL to Complainant-I-4

- (a) Please state every health condition you claim was caused by a smart meter or will be caused or worsened by the installation of PPL Electric's new smart meter.
- (b) Please provide the date that every health condition identified in subpart (a) began.

- (c) Please provide copies of all your medical records of every health condition identified in subpart (a).
- (d) For each alleged health condition that you do not have medical records for in response to subpart (c), please state whether such condition was diagnosed by a medical professional. If so, please provide the name, address, and telephone number of the medical professional and the date of the diagnosis.
- (e) For each of the alleged health conditions identified in subpart (a), please state whether you have been prescribed any therapy or treatment for the condition by a medical professional. If so, please identify the therapy or treatment, provide the name, address, and telephone number of the prescribing medical professional, and provide the date the therapy or treatment was prescribed.

RESPONSE:

As stated in the original complaint, my concern is the risk of future health issues caused by the smart meter. I did not indicate that the smart meter "has" caused health issues. As the smart meter has not yet been installed, I have not claimed it to have caused any issues to date.

PPL to Complainant-1-5

Please identify each person you plan to call as a fact witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
- (c) Provide the source(s) of information relied upon or referenced by the witness.

RESPONSE:

N/A

PPL to Complainant-1-6

Please identify each person you plan to call as an expert witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify;
- (c) Provide the source(s) of information relied upon or referenced by the witness; and
- (d) Provide a copy of the expert witness's current curriculum vitae.

RESPONSE:

N/A

PPL to Complainant-I-7

Please provide copies of all exhibits you intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of your direct case, please identify the witness who will be sponsoring the exhibit.

RESPONSE:

EXHIBIT A

Regarding the expectation of safety provided by utility company:

Title 66, Section 1501

Re: Safety

<https://www.legis.state.pa.us/WU01/LI/LI/CT/HTM/66/00.015.001.000..HTM>

EXHIBIT B

<http://woctoheal.com/info-on-electrical-poisoning/smart-meter-info/>

EXHIBIT C

Studies of Dr. Martin Blank found at various locations:

<http://www.physiology.columbia.edu/MartinBlank.html>

Blank M (2014) Overpowered: The Dangers of Electromagnetic Radiation (EMF) and What You Can Do About It. Seven Stories Press, 271pp

## EXHIBIT D

### Fire safety concerns information:

<http://emfsafetynetwork.org/smart-meters/smart-meter-fires-and-explosions/>

<http://emfsafetynetwork.org/tag/smart-meter-fires/>

<https://abc30.com/lawsuits-claim-faulty-pg-e-smart-meters-started-house-fires/2657513/>

<https://www.usatoday.com/story/news/nation/2014/09/16/fire-chiefs-call-for-smart-meter-probe-after-blazes/15751373/>

<https://www.electrosmogprevention.org/stop-ca-smart-meter-news/when-smart-meters-cause-fires-and-kill/>

<https://stopsmartmeters.org/frequently-asked-questions/faq-fire-and-safety-issues/>

<https://www.lifeenergysolutions.com/blog/smart-meter-fires/>

## EXHIBIT E

### California PUC and Opt Out Article:

This article contains verbiage regarding the acceptable standards being out of date.

<https://eon3emfblog.net/santa-cruz-landmark-smart-meter-ordinance-health-impacts-report/>

## EXHIBIT F

### Privacy Issues and Concerns:

<https://smartgridawareness.org/privacy-and-data-security/how-smart-meters-invade-individual-privacy/>

<https://www.radiationhealthrisks.com/privacy-concerns-smart-meters/>

<https://www.nationalgeographic.com/news/energy/2012/12/121212-smart-meter-privacy/>

[https://www.researchgate.net/publication/264235247\\_SMART\\_METERING\\_AND\\_DATA\\_PRIVACY\\_ISSUES](https://www.researchgate.net/publication/264235247_SMART_METERING_AND_DATA_PRIVACY_ISSUES)

[https://www.vice.com/en\\_us/article/j5n3pb/your-smart-electricity-meter-can-easily-spy-on-you-court-ruling-warns](https://www.vice.com/en_us/article/j5n3pb/your-smart-electricity-meter-can-easily-spy-on-you-court-ruling-warns)

<https://privacyinternational.org/blog/2234/privacy-win-us-court-says-fourth-amendment->

protects-smart-meter-data

## EXHIBIT G

Health Issues and Concerns:

<https://www.radiationhealthrisks.com/dangerous-smart-meters/>

<http://emfsafetynetwork.org/smart-meters/>

<https://mdsafetech.org/smart-meters/>

<https://www.emfanalysis.com/smart-meter-health-effects/>

<http://emfsafetynetwork.org/smart-meters/smart-meter-health-complaints/>

## EXHIBIT H

Research by Physicians, Scientists and Health Policy Experts:

**David Carpenter, MD** Professor, Environmental Health Sciences, and Director, Institute for Health and the Environment, School of Public Health, University of Albany, SUNY Co-Editor, the BioInitiative Report.

**Lennart Hardell, MD, PhD** Professor at University Hospital, Orebro, Sweden. World-renowned expert on cell phones, cordless phones, brain tumors, and the safety of wireless radiofrequency and microwave radiation. Co-authored the BioInitiative Report's section on Brain Tumors.

**Paul J. Rosch, MD** Clinical Professor of Medicine and Psychiatry, New York Medical College; Honorary Vice President International Stress Management Association; Diplomate, National Board of Medical Examiners; Full Member, Russian Academy of Medical Sciences; Fellow, The Royal Society of Medicine; Emeritus Member, The Bioelectromagnetics Society.

**William Rea, MD** Founder & Director of the Environmental Health Center, Dallas Past President, American Academy of Environmental Medicine.

**Prof. Livio Giuliani, PhD** Spokesperson, International Commission for Electromagnetic Safety ([www.icems.eu](http://www.icems.eu)) Deputy Director, Italian National Institute for Worker Protection and Safety, East Venice and South Tyrol; Professor, School of Biochemistry of Camerino University, Italy.

**Olle Johansson, Ph.D.** Associate Professor, The Experimental Dermatology Unit, Department of Neuroscience, Karolinska Institute, Stockholm, Sweden; Author of the BioInitiative Report's section on the Immune System.

**Abraham R. Liboff, PhD** Research Professor Center for Molecular Biology and Biotechnology Florida Atlantic University, Boca Raton, Florida Co-Editor, Electromagnetic Biology and Medicine.

**Eric Braverman, MD** Brain researcher, Author of The Edge Effect, and Director of

Path Medical in New York City and The PATH Foundation. Expert in the brain's global impact on illness and health.

**Martin Blank, Ph.D** Associate Professor, Department of Physiology and Cellular Biophysics, Columbia University, College of Physicians and Surgeons; Researcher in Bioelectromagnetics; Author of the BioInitiative Report's section on Stress Proteins.

**Robert Becker, Ph.D** Nobel Prize nominee noted for decades of research on the effects of electromagnetic radiation.

**L. Lloyd Morgan, BS** Electronic Engineering Director Central Brain Tumor Registry of the United States, Member Bioelectromagnetics Society, Member Brain Tumor Epidemiological Consortium.

**Samuel Milham MD, MPH** Medical epidemiologist in occupational epidemiology. First scientist to report increased leukemia and other cancers in electrical workers and to demonstrate that the childhood age peak in leukemia emerged in conjunction with the spread of residential electrification.

## EXHIBIT I

Concerns of basic human rights, including health, safety and privacy:

The Human Rights Act 1998 under Schedule 1 of Part 1, Article 2 (Right to life), Article 3 (Prohibition of torture), Article 5 (Right to liberty and security), Article 8 (Right to respect for private and family life) and Article 12 (Right to marry) and Part II Article 1 (Protection of property); (II) The Equality Act 2010; (III) EU Privacy Law; (IV) EU Data Protection Law; (V) Data Protection Act 1998; (VI) The UN Convention on the rights of the Child (UNCRC) (United Nations 1989) under Article 16 (right to private and family life) and Article 37 (prohibition of torture/degrading treatment) and (VII) Nuremberg Code.

Smart "Meters" cause endangerment to residents through many factors and my reasons for denying consent for installation include:

1. United States Naval Medical Research Institute – "Bibliography of Reported Biological Phenomena ('effects') and Clinical Manifestations Attributed To Microwave And Radio-Frequency Radiation". Z .R Glaser PhD, LT, MSC, USNR (Project MF12.524.015-00043, Report No. 2) (4 October 1971, revised 20 April 1972). More than 2,300 references on the biological responses to radio frequency and microwave radiation, published up to April 1972. [http://www.radiationresearch.org/pdfs/20091016\\_naval\\_studies.pdf](http://www.radiationresearch.org/pdfs/20091016_naval_studies.pdf)
2. United States Defence Intelligence Agency Medical Section declassified document - "Biological Effects of Electromagnetic Radiation (Radiowaves and Microwaves) Eurasian Communist Countries" - DST-1810S-076-76 (March 1976). [http://www.magdahavas.com/wordpress/wp-content/uploads/2011/02/BIOLOGICAL\\_EFFECTS\\_OF\\_ELECTROMAGNETIC\\_RADIATION-RADIOWAVES\\_AND\\_MICROWAVES-EURASIAN\\_COMMUNIST\\_COUNTRIES.pdf](http://www.magdahavas.com/wordpress/wp-content/uploads/2011/02/BIOLOGICAL_EFFECTS_OF_ELECTROMAGNETIC_RADIATION-RADIOWAVES_AND_MICROWAVES-EURASIAN_COMMUNIST_COUNTRIES.pdf)
3. NASA – Electromagnetic Field Interactions With The Human Body: Observed Effects And Theories. (April 1981) <http://ntrs.nasa.gov/archive/nasa/casi.ntrs.nasa.gov/19810017132.pdf>
4. The United Kingdom "Independent Expert Group on Mobile Phones" issued a report underscoring concern that standards are not protective of public health related to both mobile phone use and exposure to wireless communication antennas (May 2000). [http://webarchive.nationalarchives.gov.uk/20101011032547/http://www.iegmp.org.uk/documents/iegmp\\_6.p](http://webarchive.nationalarchives.gov.uk/20101011032547/http://www.iegmp.org.uk/documents/iegmp_6.p)

*df*

5. The 7-nation European REFLEX study (Using Sensitive in vitro Methods). The researchers showed that exposing cells to ELF and RF electromagnetic fields could cause DNA to break apart and thus affect how cells develop. (2004) [http://www.powerwatch.org.uk/pdfs/20041222\\_reflex.pdf](http://www.powerwatch.org.uk/pdfs/20041222_reflex.pdf)
6. The ICNIRP safety standards which the UK Govt. and PHE continue to use fail to recognise the non-thermal, biological effects of microwave radiation. These standards were voted obsolete by the European Parliament, 522 to 16 votes (4 September 2008). <http://www.emfnews.org/European-Parliament-Recommend-Stricter-Safety-Limits-for-Cell-Phones.html>
7. Non thermal effects and mechanisms of interaction between EMF and living matter: a selected Summary ICEMS, eds. Guiliani, L. & Soffritti, M.: Ramazzini Institute, European Journal of Oncology, Library, Vol. 5, (2010). <http://www.icems.eu/papers/SummaryGuilianifeb25th.pdf>
8. As demonstrated by Daniel Hirsch, Senior Nuclear Policy Lecturer at University of California Santa Cruz. Smart “Meters” can expose the body to 160x to 800x times as much microwave radiation as mobile phones. Furthermore, Smart “Meters” can emit intense pulses of radiation up to \*190,000 times every day [Basis: \*Mesh Network Message Management] (January/March 2011).  
[http://www.committeetobridgethegap.org/pdf/110212\\_RFrad\\_comments.pdf](http://www.committeetobridgethegap.org/pdf/110212_RFrad_comments.pdf)
9. Council of Europe - Resolution 1815. Report issued titled "Potential dangers of EMFs and their effect on the environment". Hundreds of studies identify stress reactions and genetic problems in plants, trees, animals, birds, bees and insects. The Council advocates a precautionary principle be applied to wireless emissions to prevent public health disaster (May 2011). <http://assembly.coe.int/nw/xml/XRef/Xref-XML2HTML-en.asp?fileid=17994&http://assembly.coe.int/nw/xml/XRef/Xref-DocDetails-en.asp?FileID=13137&lang=en>
10. The World Health Organisation’s International Agency for Research on Cancer (IARC) categorised RF EMFs as a Possible CARCINOGEN (Group 2B), the same as lead, DDT, chloroform & methylmercury (31 May 2011).  
[http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208\\_E.pdf](http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208_E.pdf)  
<http://monographs.iarc.fr/ENG/Monographs/vol102/mono102.pdf>
11. Dr Andrew Goldsworthy’s research warned that electromagnetically-conditioned water flow could strip lead from pipes (after firstly removing limescale) leading to lead poisoning. N.B: Lead is a Group 2B carcinogen (1998, 2007, 2012 and 2016). Yamabhai, Chumseng, Yoohat and Srila, Thailand. Results suggest that electromagnetic-treated water can have diverse biological effects on both animal and plant cells. Findings warrant further investigation (2013). <http://www.sciencedirect.com/science/article/pii/S0043135498003959>  
[http://www.radiationresearch.org/goldsworthy\\_bio\\_weak\\_em\\_07.pdf](http://www.radiationresearch.org/goldsworthy_bio_weak_em_07.pdf)  
<http://www.cellphonetaskforce.org/wp-content/uploads/2012/04/Biol-Effects-EMFs-2012-NZ2.pdf>  
<http://www.padrak.com/yesperman/Smart%20Water%20Meter%20Hazards%208.18.16.pdf>  
<https://www.ncbi.nlm.nih.gov/pubmed/24931750/>
12. American Academy of Environmental Medicine (AAEM) - “Electromagnetic and Radiofrequency Fields Effect on Human Health” position statement. Recommendations include an immediate caution on Smart “Meter” installation due to potentially harmful RF exposure and the use of safer technology such as hard-wiring. The AAEM report non-thermal effects and express concern regarding significant, but poorly understood quantum field effects of EMF and RF fields on human health (April 2012).  
<https://www.aeonline.org/pdf/emfpositionstatement.pdf>
13. The BioInitiative Report. The latest report covers about 1,800 new studies reporting bioeffects and adverse health effects of EMFs and wireless technologies. Includes studies that report effects at non-thermal, low intensity ELF and RF exposure levels. The BioInitiative Report recommends more stringent safety limits (2012).  
<http://www.bioinitiative.org>
14. Dr M Pall et al, USA - “Electromagnetic fields act via activation of voltage-gated calcium channels to produce beneficial or adverse effects”. Non-thermal effects. Activation from extremely low RF EMFs (2013).  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3780531/>
15. Dr I Jamieson, UK. Between 3-6% of the population may be Electro-hypersensitive. Will place pressure on the NHS (2014). [http://www.radiationresearch.org/images/rrt\\_articles/IAJ\\_EHS\\_Human\\_Rights\\_0141204.pdf](http://www.radiationresearch.org/images/rrt_articles/IAJ_EHS_Human_Rights_0141204.pdf)
16. Dr A Lerchl, Germany; [Dr T. Tillman, Germany (2010)]. Studies confirm Tillman’s discovery that tumour-promoting effects are found well below the accepted standard of 4W/kg (as low as 0.04W/Kg) in mice. Non-thermal effects (2015). <http://www.sciencedirect.com/science/article/pii/S0006291X15003988>
17. Competence Initiative, Germany (Professor K. Hecht) - “Health Implications of Long-term Exposure to Electrosmog” (2016). [http://kompetenzinitiative.net/KIT/wp-content/uploads/2016/07/KI\\_Brochure-6\\_K\\_Hecht\\_web.pdf](http://kompetenzinitiative.net/KIT/wp-content/uploads/2016/07/KI_Brochure-6_K_Hecht_web.pdf)
18. US National Toxicology Program (NTP) US\$25m Rodent Study - Carcinogenesis Studies of Cell Phone Radiofrequency Radiation in Hsd: Sprague Dawley® SD rats (Whole Body Exposures) (2015 – to date).  
<http://dx.doi.org/10.1101/055699> <http://microwavenews.com/news-center/ntp-comet-assay>

19. Scientists questioning the official assessment of Radio Frequency safety. <http://www.iemfa.org/news/conflicts-of-interest-among-the-members-of-the-international-organization-icnirp/> <https://www.emfscientist.org/> <https://ecfsapi.fcc.gov/file/10910251701394/EUOPAEM%20EMF%20Guideline%202016%20for%20the%20prevention%20and%20treatment%20of%20EMF-related%20health%20problems.pdf> <https://www.degruyter.com/downloadpdf/j/reveh.2016.31.issue-4/reveh-2016-0060/reveh-2016-0060.xml>
20. Tree deaths, plant die-offs and bee colony collapse disorder cases have also been reported shortly after Smart "Meter" installation/activation in the United States. <http://stopsmartmeters.org.uk/bees-birds-and-mankind-how-wireless-radiation-is-destroying-the-natural-world-order/> <http://stopsmartmeters.org.uk/plants-wont-grow-near-wi-fi-routers-experiment-finds/> <http://phys.org/news/2010-11-dutch-wi-fi-possibly-trees.html>
21. In North America, Smart "Meters" have been shown to explode, cause fires, and can interfere with sensitive electrical devices. <http://stopsmartmeters.org.uk/smart-meter-fires-provoke-mass-removal-of-175000-units-in-canada-and-us/> <http://emfsafetynetwork.org/maine-utility-admits-smart-meters-cause-interference/>
22. A one year study in Toronto, Canada, showed the energy/utility bills have gone up in 80% of cases, many by more than 50%. <http://stopsmartmeters.org.uk/energy-firm-caught-breaking-down-door-to-install-smart-meter/>
23. Smart "Meters", in tandem with In-Home-Display units, are likely to consume far more energy than the old analogue meters do. <http://refusmartmeter.com/smart%20meter%20aug%2026.pdf>  
"Just say no to Big Brother's Smart Meters – The latest in Bio-Hazard Technology" - By O. Koehle (see Page 7)
24. National Security Agencies, namely GCHQ (March 2016), FBI (2010, 2012) and CIA (2012) have criticised Smart "Meters" as a major security risk. Former CIA Director James Woolsey has called the Smart Grid a "really, really stupid idea". <http://www.theinquirer.net/inquirer/news/2451793/gchq-intervenues-to-prevent-catastrophically-insecure-uk-smart-meter-plan> <http://stopsmartmeters.org.uk/fbi-smart-meter-hacks-likely-to-spread-utilities-are-unprepared/> <http://stopsmartmeters.org.uk/cia-director-calls-smart-grid-really-really-stupid/>