

February 21, 2012

Jean Jewell, Secretary
Idaho Public Utilities Commission
PO Box 83720
Boise, Idaho 83720-0074
FAX: (208) 334-3762

RECEIVED
2012 FEB 22 AM 9:31
IDAHO PUBLIC
UTILITIES COMMISSION

VIA: HAND DELIVERY

RE: Case No. IPC-E-12-04

Bonnie Menth and Vicky Davis, Complainants, vs. Idaho Power Co., Respondent

Dear Ms. Jewell:

Enclosed for filing are an original and seven (7) copies of Bonnie Menth and Vicky Davis' response to Idaho Power's Answer to the Summons in the above matter.

Sincerely,



Vicky L. Davis,
Complainant



Bonnie Menth
Complainant

RECEIVED

2012 FEB 22 AM 9:32

IDAHO PUBLIC UTILITIES COMMISSION

Bonnie Menth, Complainant
Case No. IPC-E-1204

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

BONNIE MENTH AND VICKY DAVIS,)	
)	Case No. IPC-E-12-04
Complainants,)	
)	RESPONSE TO ANSWER
vs.)	
)	
IDAHO POWER COMPANY,)	
)	
Respondent.)	
)	

Complainant, Bonnie Menth, hereby responds to answers provided to the IPUC for the Summons issued in the above entitled-case by the Respondent, Idaho Power Company, as follows:

I. Factual Background

Idaho Power Company is an investor owned, regulated utility which is in the business of selling electricity. I am a consumer of electricity and a customer of Idaho Power. The implied contract for electric service with Idaho Power is that they safely provide electricity to my home, meter the usage, bill me for it and then I pay for it.

Idaho Power informed its customers by postcard last year that meters would be replaced with the Smart Meter. The AMI Smart Meter does meter usage, but it also consists of a two-way communication component using TWACS power line communication technology. TWACS PLC and the Smart Meter produce dirty electricity which flows into the home and radiates from interior household electrical wiring. This dirty power causes me physical suffering and is a health risk to the Public. The Smart Meter invades the privacy of my home by recording real time data of electrical usage which creates a vivid profile of personal living habits.

For these reasons, I informed Idaho Power that I did not want AMI Smart Metering Technology placed on my home and requested that they provide a filter to clean up the dirty power from their TWACS PLC Smart Metering Technology before it enters my home.

On the morning of December 13, 2011, when I was out of town, an installer and an Idaho Power representative accompanied by a city police officer, climbed over my fence and forcefully installed the device. A complaint was filed with the Idaho Public Utilities Commission and a Summons was issued to Idaho Power to answer the complaint. I have received a copy of their answer on February 10, 2011.

II. RESPONSE TO IDAHO POWER'S ANSWER

A. Idaho Power Has Created a False Sense of Security for Ratepayers and the Public At Large.

On August 11, 2011, Mark Heintzelman of Idaho Power responded to my email with information of IPC's use of TWACS power line communication. Since that email, I have understood that their Smart Meter would not be using wireless communication.

Americans are familiar with wireless communication and its possible adverse health effects, however we are not familiar with TWACS power line communication. TWACS PLC works by transmitting a pulse, 120 times a second, onto the electrical 60 Hz signal. This pulse itself is in the 200 to 650 Hz range.¹ This added pulse communication produces high frequency voltage transients. Dirty electricity is also caused by the switching-mode power supply and possibly other components of the Smart Meter, another unfamiliar technology. The dirty electricity flows into the home and radiates from all electrical wiring inside the home. This dirty electricity also flows onto the electrical wiring from customer's premises to neighbors' that are served by the same transformer.²

¹ eiwellspring.org

² docs.cpuc.ca.gov/efile/C/146649.pdf

Dirty electricity is a health risk.³ An insert in a current Idaho Power bill states:

“Your smart meter DOES NOT use any wireless communication media”
(emphasis in original)

When the Public presents their health concerns of Smart Meter Technology to Idaho Power, their reply is that we are confusing their technology with wireless, and that theirs is not wireless. This implies that TWACS PLC Smart Metering Technology is safe and thus dismisses what are legitimate concerns and facts about this unfamiliar communication technology.

B. Idaho Power Claims that Their Smart Meter Device is Fundamentally Different from Meters using Wireless Communication

Smart meters are the same regardless of communication method used. One radiates from wireless communication; the other radiates from electrical wiring in the home from power line communication. Smart Meters produce their own dirty power which is added the electrical current flowing into the home.

Smart meters have the capability to be remotely reprogrammed by the utility to enable functions which are currently disabled or updated with new software at any time with whatever functions are available and may do this without customer notification or consent.

These functions include remote connect or disconnect service, control of appliances, determination of what electronic device is being used, when we watch

³ Biological Effects of Dirty Electricity with Emphasis on Diabetes and Multiple Sclerosis, Magda Havas, <http://www.ncbi.nlm.nih.gov/pubmed/17178585>

a DVD or TV, for how long and how often, when we go bed, wake up, or stay up late, the occupancy status of our home, when we take a shower, if we use laptops or desktops, if we consume a lot of electricity at “unusual” hours.

Smart Meters create intimate details of our private activities in the most private of places, our homes. They are surveillance devices.^{4 5} And the information they provide is being sought after by numerous companies for marketing purposes.

C. Idaho Power Answers that they did not send their installer to my house after the previous contacts

The contacts referenced are emails of August 10-11th, in which I had notified Idaho Power that I did not want a Smart Meter installed. Contrary to Idaho Power’s Answer, they did dispatch their Smart Meter installer, Tru-Chek, at least two times to my home as indicated by the flyers left on my door on August 19th and August 23rd. (Attachment 1) Tru-Chek then called for an installation appointment. Idaho Power’s November 18th letter also states that their installer was sent to my home during the referenced time period.

D. Idaho Power Fails to Address Complaint of Misrepresentation

⁴ <http://scc.lexum.org/en/2010/2010scc55.html> In The Supreme Court of Canada - Smart Meter DRA device placed on suspects home for the intent of surveillance; includes a reference to another family investigated because the Smart Meter indicate possible suspicious use of electricity when in fact they were growing orchids.

⁵ www.denverpost.com/greenbusiness/ci_15106430 *New Electricity Grids May be Smart, but Not So Private*

During a August 30, 2011 visit by two Idaho Power representatives, an Idaho Power representative denied knowing of or ever hearing of a Smart appliance and that their technology would never “communicate” with them using the wiring of my home. This misrepresentation needs to be addressed.

E. Idaho Power Falsely Asserts that a Small Number of People Ascribe Health Effects to constant exposure to EMF

Dr. Thomas Rau, Medical Director of the world renowned Paracelsus Clinic in Lustmühle, Switzerland says he is convinced 'electromagnetic loads' lead to cancer, concentration problems, ADD, tinnitus, migraines, insomnia, arrhythmia, Parkinson's and even back pain.⁶ It is estimated that 3-8% of populations in developed countries experience serious electrohypersensitivity (EHS) symptoms today, and 35% experience mild symptoms. With increasing electromagnetic field exposures,⁷ these numbers, along with the suffering involved for people who are impacted, and the health care costs involved, are bound to go up.

⁶ electromagnetichealth.org/electromagnetic-health-blog/medical-director-of-switzerland/

⁷ <http://aje.oxfordjournals.org/content/140/9/805.abstract> Hydro Quebec suppresses University report, “ Association between Exposure to Pulsed Electromagnetic Fields and Cancer in Electric Utility Workers in Quebec, Canada, and France”.

Since the Smart Meter was placed on my home, what used to be mild symptoms have now escalated to severe symptoms. Mild tinnitus has now become a 24/7 non-stop scream. I hear it as I attempt to sleep, and it's the first thing I hear when I wake. What used to be infrequent heart palpitations have become frequent daily occurrences, along with sensations of vibration, burning, and dizziness.

Since this meter was placed on my home, I have incurred medical expenses, replaced a digital thermostat with a mechanical one, digital clocks to mechanical, replaced an electric clothes dryer with a gas model and a gas supply setup, removed CFL light bulbs⁸ with incandescent and LED, and purchased EMF surge filters and professional meters in attempts to mitigate the dirty power and its negative health effects.

I have begun keeping a log of readings from my electrical outlets using a Graham Stetzer professional meter.⁹ The Stetzer Meter¹⁰ is highly regarded and has been

⁸ www.magdahavas.org/tag/cfl CFL's produce high levels of radio frequency and contain mercury. Why have our electric companies pushed them on us?

⁹ Stetzer meter used in solving the relationship between power quality and cancer, "A New Electromagnetic Exposure Metric: High Frequency Voltage Transients associated with Increased Cancer Incidence in Teachers in California School".

¹⁰ Attachment 2

used in some well known cases involving public schools where it was proven that high levels of dirty power on the classroom wiring using 60 Hz power created clusters of cancer and leukemia.

The Stetzer meter gives a reading which has removed the 60Hz signal when plugged into an electrical outlet, so that the read out is a measurement of dirty electricity (high frequency transients). Readings of 0 - 25 GS are good; 25 to 50 GS are average; over 50 GS are undesirable. I take readings several times a day using different variables such as when appliances or HVAC are running vs. when they are not, computers off or on, and even turning circuits off at the breaker panel to see if that affects the reads of other circuits.

I have found that high frequency voltage transients, aka dirty power, readings are related to the time of day and the day of the week and that they are independent of dirty power from the use of my appliances. Idaho Power is delivering a very poor quality of power to our homes. High frequency voltage transients from electrical wiring have been associated with many serious health problems including cancer, MS, myeloma, diabetes, Parkinsons, ADD, and more.

One evening I recorded a 1,920 GS reading when all appliances and HVAC were off with only a few lights turned on. By 10:20 PM that night with HVAC, refrigerator, and lights running, the readings had dropped down to 30 to 48 GS on every outlet. It's clear to me that the dirty power is being delivered on the electrical current flowing into my home and the amounts skyrocket when there is a high demand on Idaho Power's distribution system during peak hours which causes more high frequency voltage transients (dirty power) to be added to the electrical current which is then delivered to my home.

These high meter reads of dirty power are not unique to my home which is only 10 years old and has had no electrical problems. I have taken extremely high reads from neighboring homes using variables as previously described.

Idaho Power needs to be ordered to clean up the power before delivering it to our homes. IPC needs to be ordered to provide whole home filters to customers and filters at neighborhood transformers to block the high frequency transients from entering our homes.

F. Meter Safety In the Wilner & Associates vs. PG&E, the issue of UL certification was mentioned. I checked the Landis+ Gyr website, and it says that

their Smart Meters are not UL certified. The following paragraph is from the Landis+ Gyr FAQ website¹¹:

Are solid-state electric meters UL approved?

No. Electrical meters are not governed by nor are there any UL standards they must pass.

ANSI is the standard that applies to electrical meters.

ANSI has traditionally provided standards and telecommunications equipment certification not electrical device certification. The Smart Meter is a hybrid device and it should be certified by ANSI and UL for safety.

Idaho Power Wants Money to Remove the Smart Meter which They Were Told Not to Place on My Home.

Idaho Power makes erroneous claims of fee amounts used by PG&E. Idaho Power has proposed exorbitant fee as a means to prevent a customer from being able to afford and use a analog meter. Contrary to what was stated, PG&E is charging \$75 for removal and return of an analog meter and \$10 monthly with reduced or no fees to low income or disabled customers. No fee is charged when a customer moves. PG&E customers are protesting the Smart Meter and the fees charged just so they may have a safe, private and secure analog meter returned.

¹¹ Landis Gyr website FAQ page,
http://www.landisgyr.com/na/en/pub/products_na.cfm?eventProducts=products.ProductDetails&ID=247&catID=33

The Answer given indicates that Idaho Power continues to misinform the Public, and its suggested fees for analog meter usage amount to “protection money”.

The Commission needs to order Idaho Power to remove my Smart Meter, to provide a whole home surge filter and place filters at transformers to mitigate the dirty power from its TWACS PLC Smart Metering Technology and neighboring houses before it is delivered to my home.

It is very disheartening, now, to live in Idaho - a State where a utility company is allowed to put harmful surveillance devices on a home. It is beyond my comprehension that Idaho Power does not care that their Technology is causing mental and physical suffering and unwarranted surveillance. Because Idaho Power has a power monopoly across Southern Idaho, it feels free to dismiss customer concerns, harass, threaten, trespass, and cause harm to its customers who have no recourse as there is no other electrical provider available.

Also dismaying is that as I listened to the Idaho Public Utilities Commission read my formal complaint against Idaho Power, the only concern expressed by the Commission was for the finances of Idaho Power Company.

Is it not the Commission's duty to regulate utilities in a way that ensures that ratepayers and the Public are protected in their persons and finances from unjust and unsafe utility practices? It is my hope that the Commission will fulfill its duty.

Requested Relief

Bonnie Menth requests an order for removal of the Smart Meter and replacement of the analog meter with no award for costs associated with it. If Idaho Power hadn't rushed to force the installation while the installation was still in dispute, they would have incurred no additional costs and are therefore not entitled to additional costs.

She also requests that the policy on Smart Meters be an "opt-in" program rather than a mandatory program with no options at all because of the nature of the technology and the capabilities enabled by its installation. Idaho Power should design a consumer education program that describes in detail the technology including the negative aspects as well as the positive aspects. Idaho Power should be required to retroactively obtain the "opt-in" from all customers after they retroactively educate them on the technology per the previous statement.

Idaho Power should have a database of installed load control devices and when a disconnect order is received; Idaho Power should be required to remove the

device from the dwelling. Alternately, the device could remain as long as Idaho Power is required to inform the new customer of the device, its purpose and they give the new customer the option to have it removed without charge.

Ms. Menth requests a standing order for the cost savings due to efficiency gains achieved by computerized systems and technology to be automatically passed through to electric consumers in the form of rate reductions and not retained by Idaho Power and not dribbled in increments through rebates for participation in add-on programs.

Ms. Menth requests an order that all overhead costs associated with the Energy Efficiency Committee be taken out of Idaho Power's profits and not charged back to electric consumers.

Ms. Menth requests an independent investigation of the regulatory monopoly of the Idaho Public Utilities Commission to determine if they are fulfilling their mandate to serve the interest of the public. The regulatory structure under which the Idaho Public Utilities Commission operates was designed for the industrial era – a different time in history when each utility type was a separate and distinct business. With the integrative capabilities of computer technology and process control systems, there is a danger that the consolidated regulatory authority will be used to regulate us into a totalitarian system of control through centralized control of our critical infrastructure. Ms. Menth requests an undetermined amount for attorneys fees from Idaho Power to initiate an independent investigation of the regulatory monopoly of the Idaho Public Utilities Commission. For the record, Idaho Power's Council, Lisa Nordstrom is a former

employee of the Idaho Public Utilities Commission and may have a conflict of interest relative to this request for relief.

Dated at Twin Falls, Idaho this 21st day of February 2012.



Bonnie J. Menth

Attachments: 1- Tru-Chek flyer
2- Graham Stetzer Units

Your New Idaho Power Meter Was Not Installed

Please call
1-877-323-2131

08/23
(date)

Today, meter technicians attempted to replace your existing Idaho Power meter with a new, advanced meter. However, they were unsuccessful due to limited access:

- Locked gate
- Pet
- Other _____

Please contact the TruCheck installation office at 1-877-323-2131 to schedule a convenient appointment. The meter exchange process takes approximately five minutes, but requires a brief power interruption. There is no direct cost for the new meter or installation. In the near future, your meter will be read remotely and Idaho Power no longer will need access to your property every month.

Please phone TruCheck as soon as possible with your meter number and route identification noted below. Thank you.

152 385 80
~~160 507 99~~
(Meter Number)

85000
(Route I.D.)



Your New Idaho Power Meter Was Not Installed

Please call
1-877-323-2131

8/15
(date)

Today, meter technicians attempted to replace your existing Idaho Power meter with a new, advanced meter. However, they were unsuccessful due to limited access:

- Locked gate
- Pet
- Other _____

Please contact the TruCheck installation office at 1-877-323-2131 to schedule a convenient appointment. The meter exchange process takes approximately five minutes, but requires a brief power interruption. There is no direct cost for the new meter or installation. In the near future, your meter will be read remotely and Idaho Power no longer will need access to your property every month.

Please phone TruCheck as soon as possible with your meter number and route identification noted below. Thank you.

15 238 580
(Meter Number)

85000
(Route I.D.)



ATTACHMENT 1) DOOR FLYERS FROM IPC'S SMART METER INSTALLER

For more information visit Idaho Power
www.idahopower.com.

For more information visit Idaho Power's Web site,
www.idahopower.com.

new exposure metric, high frequency voltage transients existing on electrical power wiring, is an important predictor of cancer incidence in an exposed population.

The new metric, GS units, used in this investigation is measured with a Graham/Stetzer meter (G/S meter) also known as a Microsurge II meter (MS II meter), which is plugged into electric outlets [Graham, 2005]. This meter displays the average rate of change of these high frequency voltage transients that exist everywhere on electric power wiring. High frequency voltage transients found on electrical wiring both inside and outside of buildings are caused by an interruption of electrical current flow. The electrical utility industry has referred to these transients as "dirty power."

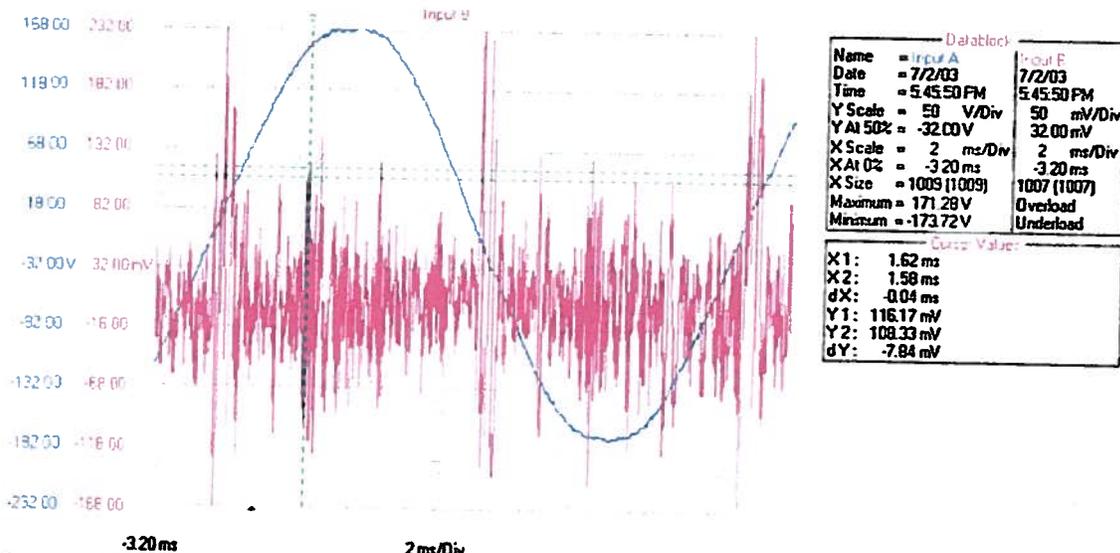
There are many sources of "dirty power" in today's electrical equipment. Examples of electrical equipment designed to operate with interrupted current flow are light dimmer switches that interrupt the current twice per cycle (120 times/s), power saving compact fluorescent lights that interrupt the current at least 20,000 times/s, halogen lamps, electronic transformers and most electronic equipment manufactured since the mid-1980s that use switching power supplies. Dirty power generated by electrical equipment in a building is distributed throughout the building on the electric wiring. Dirty power generated outside the building enters the building on electric wiring and through ground rods and

conductive plumbing, while within buildings, it is usually the result of interrupted current generated by electrical appliances and equipment.

Each interruption of current flow results in a voltage spike described by the equation $V = L \times di/dt$, where V is the voltage, L is the inductance of the electrical wiring circuit and di/dt is the rate of change of the interrupted current. The voltage spike decays in an oscillatory manner. The oscillation frequency is the resonant frequency of the electrical circuit. The G/S meter measures the average magnitude of the rate of change of voltage as a function of time (dV/dT). This preferentially measures the higher frequency transients. The measurements of dV/dT read by the meter are defined as GS (Graham/Stetzer) units.

The bandwidth of the G/S meter is in the frequency range of these decaying oscillations. Figure 1 shows a two-channel oscilloscope display. One channel displays the 60 Hz voltage on an electrical outlet while the other channel with a 10 kHz hi-pass filter between the oscilloscope and the electrical outlet, displays the high frequency voltage transients on the same electrical outlet [Havas and Stetzer, 2004, reproduced with permission].

Although no other published studies have measured high frequency voltage transients and risk of cancer, one study of electric utility workers exposed to transients from pulsed



THE WAVEFORM WAS COLLECTED IN ROOM 114 AT THE ELGIN/MILLVILLE MN HIGH SCHOOL. CHANNEL 1 WAS CONNECTED TO THE 120 VAC UTILITY SUPPLIED POWER RECEPTACLE. CHANNEL 2 WAS CONNECTED TO THE SAME POTENTIAL, EXCEPT THROUGH THE GRAHAM UBIQUITOUS FILTER. (REMOVES THE 60 HERTZ) THE AREA BETWEEN THE CURSORS REPRESENTS A FREQUENCY OF 25 KILO HERTZ. A TEACHER WHO PREVIOUSLY OCCUPIED THE ROOM DIED OF BRAIN TUMORS AND THE TEACHER IN THE ADJOINING ROOM DIED OF LUEKEMIA.

FIGURE 1. Oscilloscope display of dirty power: 60 Hz electrical power (channel 1) with concurrent high frequency voltage transients (channel 2). A 10 kHz hi-pass filter was used on channel 2 in order to filter out the 60 Hz voltage and its harmonics. [Color figure can be viewed in the online issue, which is available at www.interscience.wiley.com.]