

**Climate Change! SO URGENT, We Need to DO SOMETHING!  
EVs and Smart Meters? But Let's Not Look Behind the Curtain!**

**"There are times when this house feels like it is hooked up to a high powered electric fence."**

In August and early September, 2020, Massachusetts utility regulators solicited comments from interested parties regarding a proposal to offer a time-of-use, or variable rate pilot, for electric vehicle users, possibly enabled by smart meters. In the same docket, the Massachusetts Dept. of Public Utilities also solicited comments about replacing current electric meters with next-generation advanced metering functionality, which can be leveraged into time-of-use billing for all costumers.

One of the early justifications for smart meter deployments was that that they would help to integrate renewables, including solar, into the grid. But that has not gone particularly well in the U.S., at all, for example for the solar industry.  
(<https://www.renewableenergyworld.com/2016/02/23/notes-from-the-solar-underground-the-us-utility-war-against-net-metering/#gref>)

The Massachusetts proposal to begin using time-of-use billing for electric vehicle users is based, in part, on the intention to develop standards for EVs to charge during off-peak hours and be able to deliver energy to the grid during peak hours, as recommended by the "Commission on the Future of Transportation in the Commonwealth." As "Massachusetts Department of Energy Resources ("DOER") noted, " In order to leverage the grid benefits of EVs, the Department should seek to implement policies to manage EV charging in the short-term while providing for the continued future advancement of customer-facing investments in the utilities' Grid Modernization Plans, with an emphasis on moving towards real-time price signals. This will lead a natural progression toward bi-directional power markets between customers and the grid."  
DOER\_Initial\_Comments\_8-13-2020.pdf

Is this an impractical pipe dream, or a valid strategy for environmental stewardship? Who decides?

As Katie Singer, author of Electronic Silent Spring notes, "Are Electric Vehicles Really Better For The Planet?"  
<https://ryanmunsey.com/katie-singer-are-electric-vehicles-really-better-for-planet-earth/>

Smart meters are part of the burgeoning "Internet of Things" electrical-pollution and energy consumption footprint, whereby devices will be continuously communicating with each other, wirelessly.

Fueling the demand for all things wireless is unacknowledged planetary exploitation, and massive human rights violations, caused by both conflict mineral mining and e-waste.

In Europe, Green Party candidates are opposing the massive energy and resource consumption, and risks, of 5G, the next generation of telecommunications infrastructure. Not so with the Green New Deal. Not so in the United States, where environmental advocacy groups continue to side with the industry against the citizens in the name of climate action.

Industry interests are promoting equal access to time of use billing as a "right" and a form of economic justice.

For example, the Conservation Law Foundation noted: "The Department Must Ensure Environmental Justice and Equitable Implementation of TVR."

(CLF\_Reply\_Comments\_9-4-2020.pdf)

Acadia Center wrote: "Massachusetts cannot afford to further delay deployment of the technologies that will enable its citizens to participate in and help to accelerate the clean energy transition, without risking significant added expense to meet upcoming climate mandates. Acadia Center urges the Department to utilize this docket to not only lay the groundwork for AMF and TVR for EVs, but also to lay out a pathway forward to widespread use of such technology and rates."

DPU 20-69 Grid Mod 2 AMF Acadia Center Response Comments

The Dept. of Energy Resources wrote: While demand management and other EV charging optimization incentives may be able to provide the needed control or pricing signals for EV customers, AMI is still a pressing need for all customers, and the Department should pursue AMI at the soonest practicable time to enable a transition from incentive based EV programs toward enabling a broad range of TOU pricing signals. DOER\_Reply\_Comments\_9-4-2020.pdf

Cape Light Compact JPE wrote, "... eventually all customers (on all suppliers) need to have access to AMI and TVR. Given that, the Department should take a comprehensive look at the overall customer base and costs to deploy AMI and TVR. Eversource and National Grid need to move in the direction of Unitil in terms of updating technology and enabling their customers to reduce their electricity use during times of peak demand. " CLC\_Reply\_Comments\_9-4-2020 (1).pdf

The stance that time-varying rates are an issue of environmental justice ignores the reality that low and middle income ratepayers have to finance the infrastructure and software, and often do not own swimming pools, EVs, and central air conditioning, and are often not in a position to shed load, for example for those working third shifts. In addition, those living in more densely populated areas will be exposed to increased radiation from banks of meters, as well as other sources of RF. But the environmental justice argument continues to be leveraged to justify investment by ratepayers on behalf of investor-owned utilities.

Here is an overview of some important points raised in testimonies presented to the MA DPU.

## MA DPU 20-69 Public Comment Quotes

(go to <https://eeaonline.eea.state.ma.us/DPU/Fileroom/dockets/bynumber> and enter 20-69 to view)

### Individual Comments and Reply Comments:

(posted as they are listed on the website, by date submitted, most recent at top:)

Shirley Denton Jackson: **Since the Telecom Act of 1996, the FCC and the wireless/utility industries have continually spoken as a “broken record” – repeating and repeatedly discounting any scientific or practical effort to avoid being accountable for human biological impacts. ... I particularly abhor their routine of discounting practical precautionary safety practices.** Why are we allowing and encouraging the further deployment of huge increases in ambient RF/MR exposure levels, without making sure that our human exposure guidelines are up to date? Shirley\_Denton\_Jackson\_comment\_9-4-2020.pdf

Beatrice A. Golomb, MD, PhD. Professor of Medicine UC San Diego School of Medicine: I am opposed to the MA DPU conducting a targeted smart meter/time of use billing pilot for EV customers. According to a survey we conducted, **smart meters were the single most common "trigger" for people newly developing intolerance to nonionizing radiation** (i.e., for developing "electrosensitivity"). These findings comport with findings by others. See also the Australian study by Lamech on health problems arising with smart meter use 1

1. Lamech F. Self-reporting of symptom development from exposure to radiofrequency fields of wireless smart meters in Victoria, Australia: A case series. *Altern Ther Health Med* 2014; 20:28-39. Golomb\_comment\_9-4-2020.pdf

Mark Giordani, the Portfolio Group: The callous disregard of personal privacy and the arrogant sense of entitlement around data collection /data warehousing / privacy invasion, etc. are simply not reflective of the ethical standards, we must demand from companies, who are lavishly afforded monopolistic power, in the marketplace. What's more, Smart Meter designs are sloppily engineered, and are simply not smart enough.

**An intelligent Smart Meter would NOT radiate dwelling occupants, 100's of thousands of times per day, with intense pulses of health-compromising RF/Wireless energy.**

A large bank of Smart Meters (Such as found in apartment buildings, condos, multi-unit dwellings and commercial structures) would NOT obliterate the occupants of those structures, with an amplified barrage of redundant, noxious transmissions – from each and every meter.

**A truly “Smart Smart Meter” would be fitted with a clean, pure sine-wave power supply**, that would not add a hidden burden of noisy power-frequency harmonics, nor impose an additional fire risk from cheap, sloppy onboard junk electronics and arcing connectors.

A “Smart”, Smart Meter, where occupant well-being was prioritized and not callously ignored, would not have been created to inflict MAXIMUM damage to occupants, but would remain 100% RADIO SILENT, OTHER, than to report extremely rare events of potentially extreme urgency or significance (if anything, at all.)

An “Ingenious” Smart Meter would have a sine-wave quality power supply (if any), and would not be wireless at all. Instead, needed infrastructure would be built, on top of a world-class, secure & durable fiber-optic backbone, that is, if any of this technology was really necessary to begin with. [Giordani\\_comment\\_9-4-2020.pdf](#)

Kirstin Beatty: Here I want to cite a submission to FCC 12-39 by Lloyd Morgan which addresses many of the conflicts of interest of organizations frequently cited in denial of EMR biological activity. For emphasis, many of these organizations have the same members. As an update, I reference the Microwave News article, “The Lies Must Stop Disband ICNIRP.”

The Bioinitiative report summarizes of peer-reviewed science in its reports – and so this engineer is casting aside hundreds or thousands of studies by many different scientists on the basis of industry lobbyist advice.

Secondly, **radiating sources are not all alike. The smart meter sends out very high spikes among its signals, it is not constant and smooth. Many researchers believe that this pulsing, modulating signal is far more disruptive for our cells than a constant continuous wave.** [Beatty\\_formal\\_reply.pdf](#)

Leonore Alaniz: **Exposure to RFs makes me loose balance, give me hot sensations, rapid heart beat, subsequently shortness of breath, foggy thinking; pain in joints, especially in the jaw. I avoid RFs / wifi, and need to have control over RF exposure. Smart meters do not allow that. Their pulsations interferes with the electric circuitry of my own body,** by overpowering it. I do not wish to become afflicted with electrohypersensitivity, as many people are already.

[Alaniz\\_comments\\_9-4-2020.pdf](#)

Dr. Lisa Nagy MD: Six years after the Feb. 2014 hearing, now that the MA DPU is promoting the deployment of smart meters by investor-owned utilities in the Commonwealth, the issue of smart meter and wireless health effects should be revisited. **The science, provided in part by the product defense firm Gradient, that formed the foundation of the MA DPU's claims that the meters do not cause harm, should be investigated against the body of non-industry funded peer-reviewed independent science.** Since that 2014 hearing, our own government, via the **U.S. National Toxicology Program's \$30M study, in 2018 determined “clear evidence” of cancerous tumors and DNA damage.** Italy's Ramazzini Institute published another large study in 2018 that corroborates what we found in the U.S. This same type of hazardous radiation, radiofrequency, is emitted by utility “smart” meters, macro cell antennas, 5G small cell antennas, wi-fi systems, and all of our personal wireless devices. **Massachusetts' infrastructure plans, therefore, should disentangle the Commonwealth from radiofrequency-emitting technologies promoted by industry and focus instead on biologically safe, sustainable, energy efficient hard-wired**

**technologies to the premises that do not transmit radiation emissions.** Nagy\_comments\_9-4-2020.pdf

Louise Berliner: I am opposed to the MA DPU conducting a targeted smart meter/time of use billing pilot for EV customers for many reasons, but would like to point out an underlying pressing practical issue that I don't believe has been addressed. And that is, **the investment of the Commonwealth in a technology which is soon to become obsolete as we move into the energy grids of the future, grids which include solar and other decentralized renewable electric sources often called distributed energy resources.** Why invest in outdated technology when in a few short years we will have better architecture that will be more climate conscious, efficient and safer? For example, there is a new technology being developed by the US Department of Energy and being implemented in Brooklyn. It's called Transactive Energy, or TE.  
Berliner\_comments\_9-4-2020.pdf

Becky Huck: It has been a little over a month now that a wireless smart meter was installed on my property without me knowing it. Even without knowing that it was installed, I knew something was wrong. Health problems started to flare up and I couldn't figure out why. I moved here to get away from wireless technology because it was taking me down. All of my health problems decreased and many completely disappeared after moving here and giving up wireless technology. Now, health issues are returning. **Some of those health problems have returned or intensified. They are: intense headaches where over the counter medication provides no relief; pain and pressure in the eyes and ears; increased electrical static in the ears making it extremely hard to hear; sensation of cells vibrating back & forth a million times a second; increased shakes or tremors; decrease in fine motor skills; increased sinus pressure and drainage; numbing of the hands and feet; digestive issues, pain in the joints; increased daily hair loss; insomnia; and increased chemical sensitivity to name a few. There are times when this house feels like it is hooked up to a high powered electric fence.**  
Huck\_comments\_9-4-2020.pdf

Virginia Rosen: I respectfully request that all parties and entities, Please, be respectful and conscientious of your every thought, word, action or inaction and the consequences to the health and safety of this Commonwealth of Massachusetts, The World and beyond.

".. Anencephaly (when babies are born without brains). As noted in the article, "What is environmental racism and why should we care about it."

<https://www.un.org/development/desa/disabilities/envision2030.html>

excerpts....

">By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment

>By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse  
>Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle  
**>Promote public procurement practices that are sustainable, in accordance with national policies and priorities**  
**>By 2030, ensure that people everywhere have the relevant information and awareness for sustainable development and lifestyles in harmony with nature"** Rosen\_comments\_9-4-2020.pdf

Patricia Burke: As many individuals have testified in this proceeding for MA-DPU 20-69, **the MA DPU held hearings in February of 2014** regarding the health concerns raised about smart meters. **Tobacco scientist Peter Valberg testified on the health panel**, the same week that he also filed testified for Phillip Morris cigarettes in a court case in Ohio. He also testified before the Worcester zoning board on behalf of National Grid, and Peter Valberg and/or Gradient have provided testimony on safety for many projects in the Commonwealth and elsewhere.

**After Peter Valberg testified, the MA DPU published a smart meter order 12-76-B that made the unprecedented claim that exposure guidelines are adequate to protect against both thermal and non-thermal impacts of radio frequency exposure.** The circumstances surrounding how that gross misrepresentation was incorporated in the MA DPU order, which then can be referenced in other proceedings, have not been investigated.

But they offer a glimpse into the workings of the corruption of science that has been the mark of product defense firms like Gradient and liar-for hire testifiers like Peter Valberg, who also once worked with an unscrupulous lawyer to attempt to blame mesothelioma, (linked with asbestos exposure) on cigarettes, and offered to provide the evidence to back up the claim by publishing articles, as reported by the Center for Public Integrity. Does the MA DPU and larger energy community not recognize the significance of the wrong-doing inherent in the misrepresentation of the scope of RF guidelines? If not, what agency in the Commonwealth can be entrusted for protecting the safety of the community?

Was this "misrepresentation" the work of the MA DPU?

**The covid epidemic/toilet paper debacle may be instructive regarding the question of whether individuals will seek to balance the grid, or to charge own their cars, when there is a shortage of electricity.**

History tells us that 60 years ago, we find the Great Chinese Famine, ostensibly blamed on weather and climate conditions, but in reality, a complete failure of policy. **For those paying attention, the Green Communities Act and the subsequent Green New Deal is looking a lot like the Great Leap Forward, increasingly favoring unproven, unmonitored wireless technological approaches that disregard natural law, the environment, and human health.** Burke\_Reply\_Comment\_9-4-2020%20.pdf

David Whitty: I want to add my name to those opposed to the MA DPU conducting a targeted smart meter/time of use billing pilot for EV customers. The Department is

provided with independent science not corrupted and dismissed by industry money. I note also that many submissions are from people who have suffered severely from EMF exposure and often only recovered after moving away from the source. It does not take a great deal of science knowledge to understand that all living things have awareness, consciousness and communicate. See this documentary for proof that plants are aware of each other and of humans: <https://topdocumentaryfilms.com/the-secret-life-of-plants/>.

**The idea that man-made created EMF can be spread across the environment in increasing strength without effect on humans and all living things is so incredibly ignorant it must be willful for the purpose of short-term gain.**

Whitty\_comments\_9-4-2020.pdf

Taffy Williams, BM, MM, AS: **Despite attempts by the FCC to undercut and impede vital health and safety questions that underlie opposition to wireless radiation, these issues should be primary in any discussion of technology that includes RF EMF transmissions. By their actions, the FCC has abdicated its role of legitimate oversight of public use of the technology, while its member-commissioners are straight out of the industry it is charged with regulating.**

**The FCC is now in the midst of several lawsuits that expose its conflicts of interest and corrupt intents** even as it refuses to re-evaluate safety standards for RF EMF exposures to humans. An EV typically has at least eight transmitting devices on board in order to function. Any of these is emitting powerful RF EMF signals that can silently decimate the human body, often going unnoticed. Just because it is invisible does not mean RF EMF is harmless.

Has the MA DPU considered impacts to the environment from a saturation of EV's and its wireless transmissions? Flora and fauna are impacted, especially insects and small birds, along with mammals, even reptiles and amphibians. In these days of mass extinctions, why would we contribute to more losses as RF EMF disorients and even kills insects and birds; effects that are documented and well-proven. There are thousands of studies that prove harm to human beings from exposure to RF EMF, and eight transmitters in a vehicle represents one of the worst exposure concentrations. ([ehtrust.org](http://ehtrust.org)) If the argument states that an EV passing through is quick and exposure is almost non-existent, what about the flora and fauna that inhabit those infrastructure-laden roads? They live there 24/7 and can't escape directed beams of radiation in their paths. How would the usually small sized insects and birds implies survive the concentrated exposures meant for humans? EV infrastructure, now to be coupled with smart meters, represents a death sentence for many species of insects, flora and fauna already compromised by these invisible RF EMF transmissions.

The Americans with Disabilities Act recognizes EHS as a public health condition that warrants and requires accommodation. If EV's and their necessary wireless infrastructure are permitted to traverse our landscape those with EHS will be unable to detect where they would be exposed, where they could be excessively harmed. Smart meters will increase levels of RF EMF and add to the exposure burden. The DPU's plan to broadly saturate our environment with wireless radiation is an assault against those already struggling with EHS and the disabled who are at risk.

Williams\_comments\_9-4-2020.docx

Lynne Wycherley: I investigated health harm from smart meters in depth for an international environmental journal in 2017. I can confirm that the health concerns raised by Massachusetts residents and ratepayers are very well-founded and I urge you to support them in their calls to decline MA DPU 20-69. Smart meters ought not to be inflicted on any group; nor should any group be targeted. This includes EV customers. **Viewed from a health and data privacy perspectives, among others, such meters sadly constitute a backward step rather than a modernization. They pollute properties with permanent electromagnetic radiation that in the coming future may be revised upwards from a 2B carcinogen status to a stronger classification. Until all health issues are transparently presented to all ratepayers in material donated or approved by independent peer-reviewed precautionary scientists and doctors in the field, no group to which they are offered can be said to have truly informed consent.**

To this end, I can recommend the early-warning letter by medical professor emeritus Dr David Carpenter, co-signed by over fifty distinguished colleagues (here), <https://maisonsaine.ca/actualites/smart-meters-correcting-the-gross-misinformation.html> as well as the peer reviewed work of Professor M L Pall and Dr Dimitris Panagopoulos explaining how such electromagnetic radiation can drive hidden diseases over time. Wycherley\_comment\_9-4-2020.pdf

Catherine Dodd, Ph.D., RN: **The MA Department of PUBLIC Utilities has failed to adequately address citizen complaints since 2014 when, you used a hired (industry) gun and so called scientist Peter Valberg, to override the complaints of the PUBLIC.** You failed to investigate further and to use unbiased scientists, scientists who were not and had never been and industry contractor or on the industry's payroll. This is PUBLIC scientific misconduct! The MA Department of PUBLIC Utilities is supposed to be made up of public servants –you have a responsibility to the PUBLIC, not do the bidding of the industry. Your actions constitute regulatory malfeasance and disregard for the PUBLIC you serve. Dodd\_comments\_9-4-2020.pdf

Laurie Wodin: **Please email me to let me know what mechanisms are in place to assess the impact or damage done to human cells, animal species' cells, behaviors and demise, insects, especially pollinators, humans and global temperature increase. I would like to see documentation on the studies that you are doing to determine the effects caused by increased radiation.** For the purposes of this proposal, I would like to see the impacts these devices have on the above when Smart meters are closer to humans driving in cars than is even typical when on homes. please read the following studies that show serious negative effect on public health in 10 different categories. <https://www.americansforresponsibletech.org/scientific-studies> These are scientific studies done by independent entities, not industry. many are from the National institute of Health Wodin\_Comments\_9-4-2020.pdf

Einar Olson: Smart meters offer no customer benefits, and cause continuing customer rate hikes.



**Repeated cost benefit analyses by credible institutions show that customers have only been paying for increased utility company profits, while receiving no benefits in return.**

**No Faster Outage Reporting or Service Restoration from AMI**

**Little or No Energy Usage Savings**

**No Cost Benefit to Customers**

**Shorter Lifespan**

**Security Obsolescence Acceleration**

The State of California did an annual cost benefit analysis and found no cost benefit from their huge statewide AMI installation.

Olsen\_comments\_9-4-2020.pdf

Tais Howard: **Population groups must not suffer discrimination and health-vulnerable individuals need protection. Health risks posed by the technology requires independently investigation** and the addressing of pertinent issues including the need to provide an analogue meter and expert shielding the premises from transmissions from neighboring meters. No further costs should be incurred by ratepayers and the cost of necessary accommodation must be factored into any financial forecasts for benefits of wireless meters and infrastructure.

Howard\_comments\_9-4-2020.docx

Toril Jelter, MD **In my clinical practice I see profound harmful health effects from wireless radiation in adults and children. This harmful wireless radiation is the kind emitted from Smart Meters. A mechanical analog meter is a much healthier choice.** Jelter\_comment\_9-3-2020.pdf

Angel Lopez: **The purpose of all these images is show the additional RF being emitted into residential areas of Providence. The DAS and 5G antennas are bombarding the 2nd and 3rd Story height of homes while the smart meters and any new devices communicating via RF engulf all life at the ground level.** Smart meters are advertised as helping us move to a green energy grid, but all I see in Providence is more methane powered dirty energy being consumed and more excessive wires on the telephone poles. The permits are bypassing traditional approvals boards that would have already stopped installations that: block common passage ways, ruin the aesthetic of neighborhoods, decrease property values while property taxes increase, and will eventually make us sick. As I work towards reclaiming my communities voice, opinion, and say regarding Public Rights of Way, please do not omit or remove any voice from any community within Massachusetts and reject MA DPU 20-69. Lopez\_comment\_9-3-2020.pdf

Elizabeth Lawrence: I am immune-compromised, having been in remission from non-Hodgkins lymphoma for 3 1/2 years now. Though my doctors do not know the cause of my cancer, environmental factors are often a contributor. I also have a 10 year old daughter. **Until the health risks of smart meter technology are independently investigated and addressed, I do not feel comfortable having a smart meter at or near my home. The installation of smart meters discriminates against a portion of**

**the population. Opting out of a meter at no cost must also be accompanied by expert shielding of the premises to accommodate health vulnerable ratepayers. The cost of necessary accommodation must be factored into any financial forecasts for benefits of wireless meters and infrastructure** Lawrence\_comments\_9-3-2020.pdf

Amanda Kenton. Misleading Media Reports Based on Navigant Analysis of the Worcester National Grid **Smart Meter Pilot Program**  
**National Grid is based in the United Kingdom. The results of the National Grid smart meter pilot program conducted in the United States were reported in the United Kingdom and elsewhere, indicating that the Worcester smart meter pilot had a 98% retention rate and that customers saved over \$1M. It appears that the reports of customer acceptance and cost and energy savings are fraudulent, misleading decision-makers and investors internationally.**  
Prior to the Commonwealth of Massachusetts pursuing any additional pilots involving time of use billing and wireless meters, the results attributed to the Worcester smart meter pilot should be independently audited and revised. See below media reports not supported by customer and ratepayer accounts of the pilot.  
Kenton\_comments\_9-3-2020.doc

Michele Hertz. I am a utility ratepayer in New York State. **National Grid submitted the results of the Worcester smart meter pilot to regulators in New York State when National Grid was advocating for a smart meter pilot program in Clifton Park, New York. Based on that submission, the New York State Public Service Commission approved the National Grid smart meter pilot program in Clifton Park. However, the Worcester results, reported by Navigant, significantly misrepresented the customer acceptance, participation, and energy and costs savings, while under-reporting community opposition, overrun of community and ratepayer rights, and most importantly, the actual cost, impact on property values, and adverse health effects.** Navigant's report resulted in the filing of fraud complaints with the Massachusetts regulators. Massachusetts regulators must address the fraud complaints regarding the National Grid smart meter pilot in Worcester before additional smart meter initiatives are pursued. National Grid smart meter pilot programs were introduced as precursors to rolling out smart meters, yet regulators have not investigated the reports of fraud associated with these pilot programs. Smart meters do not address the climate crisis. Instead, they collect customer utility usage data, without permission, for utilities to sell that data for a profit. Before approving more smart meter experiments, regulators must require utilities to truly address the climate crisis and severe weather by hardening the grid and burying vulnerable electric lines, a top priority that utilities are ignoring while they spend billions of dollars of smart meter schemes. Hertz\_comments\_9-3-2020.pdf

Linda Farmer and Kim Matland: We echo many of the concerns you have heard from a number of citizens regarding the roll-out of Smart Meters as well as 5G, in particular those regarding the potential adverse health effects of the electromagnetic frequencies emitted by them. **Our strong preference would be for you to impose a moratorium**

**on both Smart Meters and 5G.** At the very least, please give any of us who wish to opt out the opportunity to do so. Farmer\_and\_Matland\_comments\_9-3-2020.pdf

Nancy Webber; ...consider very carefully the long term effects of EMF's on the human cell. They are creating a disruption in communication on a cellular level in our human form. This is causing many more diseases and physical malfunctions of many forms. My health and the health of many has deteriorated greatly since cell phones and WIFI have become such a wide spread phenomena. The more I do to avoid it the more ways and devices are put in place to cause even further harm. Smart meters are one of those ways. Having a meter on my home would be devastating. It is not even healthy for me to have it on a home in my neighborhood. 5G deployment is another disaster in the making with far reaching, long term effects. 5G is the frequency of water which all of humanity, animals and plants carry a significant amount of. 5G will disrupt our physical function to the extreme. Safety of humanity and the planet Earth should be the primary concern of all. **Technology should not be put in place until the safety for all has been determined with years and years of research done by people who have no stakes in the success of the product. Quick and easy does not make it right. As we get sicker and sicker, quick and easy seems like a boon when in fact it is the exact reason we are getting sicker and sicker. So very careful consideration of the big picture much be made and extensive, exhaustive research must be done before any technology including smart meters should be implemented. Safe technology or no technology should be the motto of the new millennium.** Please decline smart meters for both electric and water readings in all forms....

Webber\_Comment\_9-3-2020.pdf

Peter Tocci; My concern pertains to health effects. The premise is that **all other stated concerns, though valid in their own right, are overshadowed by, and have no practical significance due to, a single overriding factor: The terminally pathological threat of digital, pulsed (modulated/data carrying), polarized microwave radiation at the foundation of wireless telecom/WiFi systems, including smart/AMI electric (and other) utility meters. Generically speaking, wireless radiation is a field or wave of energy that, in its characteristics, does not exist in Nature, but is artificial. It has electric and magnetic properties, and is known as an electromagnetic field (EMF). From a physics standpoint, all things are, or are comprised of, natural electromagnetic fields. From a biophysics standpoint, EM fields are involved in regulation and maintenance. In the simplest terms, the artificial set of telecom/WiFi EMF's exerts disruptive influence on the natural ones. The main problem we've had is the refusal of the FCC/FDA to acknowledge/admit this.**

The IEEE standards of 1991-1992 were adopted by the FCC in 1996 via the American National Standards Institute—ANSI, a private organization funded and controlled by industry (1996 was also the year of the totalitarian Telecommunications Act). Moreover, some members of the IEEE level-setting committees hail from the military as well as telecom. These posturing institutions thereby allow the military and corporate sectors to influence or dictate public policy. It is no stretch to conclude this is also resulted in the original "risk-benefit analysis."

Power-level limits at reception point are expressed in watts over a specified area. As noted, a common designation is “microwatts per square centimeter” -  $\mu\text{W}/\text{cm}^2$ . A centimeter, is about 4 tenths of an inch. The FCC thermal standard is also averaged - over 30 minutes - meaning that longer exposure, simultaneous exposure from other devices, and the millisecond bursts, to name a few, are not covered.

An organization called the BioInitiative Working Group assumed the formidable task of selecting, collating and summarizing 3800 studies showing harm from non-heating microwave radiation—a fraction of the total number, now estimated at around 28,000, well more than twice that of lead (the number of scientific studies on a subject is one criterion for certainty that it is a hazard).

The BioInitiative Report: A Rationale for a Biologically-Based Public Exposure Standard for Electromagnetic Radiation (BR) was published in 2007 and covered 2,000 peer reviewed studies. The 2012 edition includes 2007 material and covers 1800 subsequent studies.

**The Abstract of this study gives an overview of disruptive effects of polarization, having nothing to do with producing heat: Polarization: A Key Difference between Man-made and Natural Electromagnetic Fields, in regard to Biological Activity.**

All stated concerns, though valid in their own right, are overshadowed by, and have no practical significance due to, a single overriding factor: The terminally pathological threat of digital, pulsed (modulated/data carrying), polarized microwave radiation at the foundation of wireless telecom/WiFi systems, including smart/AMI electric (and other utility) meters.

**Advanced Technology: Does Society’s Obsession Reflect a Form of Collective Mental Illness? Only by the most outrageous violation of ourselves do we come into conformity with a society bent on its own destruction.** - R.D. Laing

Tocci\_comments\_9-3-2020.pdf

Juliane Goicoechea: I recently contacted the Town of Plymouth water department that I wanted to swap out my smart utility meter for a non-transmitting (analog) utility meter. They indicated they would do so pending the passage of S. 1988. They also indicated that **I would be charged a quarterly manual meter read fee of \$125 per quarter and that they do not have the authority to waive any fees. This appears punitive over a choice of safety. Those who wish to protect themselves from wireless radiation are penalized monetarily and those with health problems are excluded from making their own homes safe, by choice** Goicoechea\_comment\_9-3-2020.pdf

Lori Vanderhider. The EPA also acknowledges the limitations of the FCC wireless radiation exposure guidelines as well as the guidelines of the Institute of Electrical and Electronics Engineers (IEEE) and the International Commission on Non-ionizing Radiation Protection, stating that **they are thermally based, and do not apply to chronic, nonthermal exposure though they are often represented as safe by the industry.**

[https://humboldt.gov.org/DocumentCenter/View/2858/GPU-197b-PDF?bidId=Vanderhidr\\_Comments\\_9-3-2020.pdf](https://humboldt.gov.org/DocumentCenter/View/2858/GPU-197b-PDF?bidId=Vanderhidr_Comments_9-3-2020.pdf)

Cece Doucette 3rd comment: **Please see the 1,879 Comments filed with the FCC recently for Docket 19-226 Targeted Changes to the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields** ([https://www.fcc.gov/ecfs/search/filings?limit=100&proceedings\\_name=19-226&sort=date\\_disseminated,DESC](https://www.fcc.gov/ecfs/search/filings?limit=100&proceedings_name=19-226&sort=date_disseminated,DESC)).

Given:

- The **non-industry funded peer-reviewed, published scientific literature documents extensive harm to people and planet from wireless technology**
  - There are **mounting legal actions to hold the FCC, industry and municipalities accountable** for safe technology
  - There is a rapidly increasing number of citizens being harmed and speaking up ... it would be prudent for the Commonwealth to halt investments in wireless technologies at all levels and work with industry to create a win-win-win for the public, the Commonwealth's economy, and the industry.
- Please examine the policy paper, "Re-Inventing Wires: The Future of Landlines and Networks," which details why the U.S. and our communities should instead invest in hard-wired telecommunications infrastructure to the premises to support economic growth, bridge the digital divide and diminish risks to security, privacy, public health and the environment.**

Doucette3rdCommentMADPU20-69090220.pdf

Cece Doucette 4th comment: When I began investigating the health and environmental impact of radiofrequency microwave radiation, I built myself a research repository to house information I wanted to share with others. I titled it Understanding EMFs, and I **created a page on Utility "Smart" Meters**. I also wanted to put myself in the shoes of our municipal leaders to help them address the wireless radiation issue from where they stand so I created a page for them too. I would like to enter into the public record for DPU 20-69 the following resources from those pages to outline the issues and provide solutions for the Commonwealth:

**Utility Smart Meters & Resources for Municipal Leader**

Doucette4thCommentMADPU20-69090220.pdf

Deb Hodgdon: **The state of New Hampshire has listened to its constituents, heard the scientific evidence of harm and established a Commission to investigate the potential health and environmental effects of wireless technologies.**

Massachusetts would be wise to listen to its citizens, and use caution with the promise of these new technologies. There is ample concern with regard to privacy, cybersecurity and excessive energy consumption for something that is also supposed to be "green". Above all else, put the potential safety and well-being of Massachusetts citizens first, as these are attached to homes. Rather than investigating additional smart meter pilot programs, the MA DPU, utilities, Governor, Mayors, Attorney General, and citizenry should join efforts to ensure safe technology, and hold the FCC accountable for inadequate pro-industry regulation that endangers the economic vitality and health of the Commonwealth. **First, do no harm.**

Hodgdon\_comments\_9-2-2020.pdf

Karen Favazza Spencer **After years of heart irregularities confirmed by a Holter monitor, I realized that the Smart Meter attached to my house by the Water Department was interfering with not only my heart rhythm but also my sleep.**  
Favazza\_Spencer\_comments\_9-2-2020%20(2).pdf

Stephen Dahl: **Having these two-way radiofrequency-emitting meters on, or near, my home would directly impact my health negatively, and the health of my wife and growing children.** Any attempt to call this environmental, this fraudulent handout to industry at the expense of the health of the human populations of the Northeastern states, is ludicrous. Dahl\_comments\_9-2-2020.pdf

Dr. William Maykel: The DPU participated in fraud, malfeasance, and scientific misconduct by allowing Peter Valborg, a long-standing industry-friendly scientist to sign off on the health aspects of this technology. The evidence is quite clear and overwhelming as to the neurotoxic and carcinogenic aspects of microwave technology. As a practicing chiropractic physician with 42 years of experience **I encounter RF's negative effects daily on my patient population of all ages. These waves down-regulate the command control center (the circadian clock function) in our brains at the highest point where stress and environmental adaptation take place. The net negative effect is that microwaves turn a coherent brain stress response into one of chaos, promoting all disease, pain, and suffering.** Maykel\_Burke\_Reply\_Comment\_9-1-2020.pdf

Patricia Burke: **Unfortunately, in an EMF- polluted environment, the clamping down of the 22 boney plates in the head is one probable mechanism of injury for many individuals reporting adverse reactions to radio frequencies, in addition to other harmful effects identified by microwave-injured patients, and by non-industry, independent researchers. More importantly, I believe this protective** reaction of the bones tightening in the skull is a mechanism of injury for patients who do not realize that their biology is reacting to RF, for example, some portion of those being treated for increasing sleep issues, headaches, cognitive issues, mast cell activation, cardiac concerns, nosebleeds, glandular issues (including thyroid and adrenals), and especially for anxiety. Even more importantly, I believe that many young children being disciplined or medicated for behavioral issues such as oppositional defiance disorder may be under the influence of a brain that is compressed, dehydrated, not properly cushioned, and overheated, with an alarmed, overcharged nervous system. I believe that this reaction by the body's intelligence to an environmental pollutant is an underlying, unacknowledged disease vector contributing to increases in many chronic and/or degenerative illnesses, ranging from early childhood illnesses including autism, allergies, and ADD/ADHD, to end of life neurological illnesses including Alzheimer's. If a tobacco scientist dictated policy and decision-making for the covid epidemic, I believe that those promoting his/her work would be viewed as corrupt and incompetent, and guilty of malfeasance and reckless endangerment.

**I believe that the MA DPU, Governor, Attorney General, Legislature, and Mayors should not only not support an EV-smart meter pilot program, but that they can and should pivot on the basis of emerging data, and join in confronting the FCC about its failure to update radio frequency exposure guidelines, for example for all 17 of the categories identified in 2008 by the National Academy of Sciences,**  
Maykel\_Burke\_Reply\_Comment\_9-1-2020.pdf

Gail Hire Statement of Harm: Installation of a radiowave-emitting automatic meter on the home owned by myself and my husband has caused permanent ringing in our ears. A tinnitus diagnosis has been confirmed by my doctors. **Shortly after we bought our home in 2012, an analog meter attached to the exterior wall of our bedrooms was replaced by an automatic meter. The replacement was done without our express consent or knowledge. Initially, the ringing sound was worse when I slept in my bedroom, and I was able to stop it by sleeping in other parts of our modest-sized home. Eventually, the ringing became constant.** Our young child has been sleeping within several feet of this meter for the majority of his life. We don't know if he has tinnitus, but like me, he is now sensitive to loud, constant noises. **These meters have damaged our quality of life and should not be encouraged!**  
Hire\_Revised\_Comment\_8-30-2020.pdf

Janet Johnson....the Smart Meter aggravated my condition  
**I had the meter replaced with a meter that does not emit EMF. It has cost me about \$800 over the years, based on a \$11 fee to have the meter read monthly, however it is worth it to me because my health is better with the EMF emitting meter and I can use that room.** I have found there are many studies validating my experience, however I realize I am up against a very large, very profitable industry. I also have learned that high EMF are associated with many other health problems and know from experience that these meters do affect our health.  
Johnson\_comments\_8-29-2020.pdf

Terri Turnberg: I'm a Massachusetts ratepayer opposed to smart meters and any expansion because of **the radiation, which is harmful to my family and because I am electromagnetically sensitive.**  
Please see Massachusetts Last Tree Laws online for more information.  
Turnberg\_comments\_8-29-2020.pdf

Marianne Mather: I'm opposed to smart meters and any expansion in Massachusetts. **I'm concerned about the radiation emitted by smart meters and the impacts on my family.**  
Please see Massachusetts Last Tree Laws online for resources and information.  
Mather\_comments\_8-29-2020.pdf

Rosemarie Russell: **When the electrical meter was installed against my will and turned on to pulse every 1.5 minutes I had severe symptoms. I lost my balance and collapsed repeatedly when within 25 feet of the meter. I also had severe headaches, nausea and dizziness. I opted out of the smart meter and was**

**forced to pay \$282.00 for a meter that still emits radiation though much lower and I pay \$22.00 per month for meter reading. I have spent tens of thousands of dollars and much time to shield my home.**

Russell\_comments\_8-28-2020.pdf

Pam Steinberg: Electromagnetic radio frequencies (RFs/EMFs) from devices like smart meters have not been proven safe. More than 2000 peer-reviewed studies have shown that they are not. In 2011, the World Health Organization's International Agency for Research on Cancer (IARC) classified RFs as human carcinogens, in the same category as lead, DDT, benzene and glyphosate (the herbicide known as RoundUp).

**There is evidence that the utility industry and regulatory insiders know what we citizens are now learning as more people experience health effects from smart meters: RF's are making us sick. For example, in a memo dated September 3, 2010, Michael Peevey, then Chairman of the California Public Utilities Commission, wrote these chilling words to Pacific Gas & Electric's president Brian Cherry:**

"The press coverage was very good and helps PG&E big time, overall, as well as other companies, etc. One thought for the company: If it were my decision I would let anyone who wants to keep their old meter keep it, **if they claim they suffer from EMF and/or related electronic-related illnesses and they can produce a doctor's letter saying so (or expressing concern about the likelihood of suffering same). I would institute such a policy quietly and solely on an individual basis. There really are people who feel pain, etc., related to EMF, etc., and rather than having them becoming hysterical, etc., I would quietly leave them alone.** Kick it around. And, it sounds like the company may already have taken this step, based on a couple of the comments at yesterday's public hearing."

Opt-out decisions should not be made by the utility companies, especially privately-owned utilities whose interests are making profits while burdening customers with costly and unproven grid and meter pilots that have heretofore not shown efficacy, safety and consumer savings.

We need a no-fee opt out and a deeper investigation of the health impacts (the DPU relied on testimony provided by tobacco science lawyer Peter Valberg in 2014 during the Worcester smart meter pilot program).

Steinberg\_Comments\_8-28-2020.odt

Nina Beety: The Department of Public Utilities should reject advanced metering for Massachusetts' ratepayers for new and existing meters and for EV customers, based on the substantial evidence that **this is an unsound and unsafe investment.** Advanced metering would cost Massachusetts ratepayers repeatedly through rate increases and overbilling, increase fire and electrical risks at their homes and businesses, compromise power quality and the electric grid and connected nuclear power plants, and pose hazards to public health and the environment. DPU should also investigate existing pilots and the problems that have resulted, and return the state to analogue electromechanical non-digital metering. I have studied advanced metering since 2009 and am the author of the two reports on advanced metering attached:

Analysis: Smart Meter and Smart Grid Problems – Legislative Proposal, 2012



<https://smartmeterharm.files.wordpress.com/2012/12/1-smart-meter-problems-dec-2012-final.pdf>

Electrical Hazards and Fire Risks from Utility Company Smart/AMI/AMR/digital Meters, 2019

<https://smartmeterharm.files.wordpress.com/2019/07/fire-and-electrical-hazardsreport.pdf>

In addition, my website [www.smartmeterharm.org](http://www.smartmeterharm.org) includes news and reports from international experts and the industry on the various aspects of advanced metering.

**My 2012 report, initially written for California legislators, explains why the many problems with AMI/AMR/digital meters are not minor or insignificant and are international in scope. With the California fire season approaching last year, I wrote the second report collecting information from electrical engineers and other electrical experts, fire reports, and investigators, and sent it to state elected officials and emergency responders. As California initiated so-called Public Safety Power Shutoffs, I warned that these endanger anyone who has AMI/AMR/digital meters, because when powerlines are re-energized, this causes a surge.** All American digital meters are vulnerable to surges due to inadequate surge protection and no direct connection to ground. New small cell towers also pose a public safety hazard, in part because they generally have AMI meters installed on the utility poles, and this is a fire hazard due to the advanced metering's susceptibility to malfunction, explode, and catch fire.

Beety\_Comments\_8-28-2020.pdf

Liz Barris: **Smart meters are responsible for untold suffering of millions with symptoms ranging anywhere from ringing in the ears, headache and loss of energy, to heart attack, stroke, cancer, neurological illness and genetic damage. Furthermore they are a fire hazard, are prone to over billing and violate our 4th amendment right to privacy within the home.** Please see our Congressional white paper below with many chapter titles that might spark your interest.

<https://stopsmartgrid.org/wp-content/uploads/2013/10/LegalConstitutional-and-Human-Rights-Violations-of-Smart-Grid-andSmart-Meters.pdf>

Please reject smart meters as a waste of tax payer money, a hazard to human and environmental health and a threat to our Constitutional rights. Barris\_comment\_8-27-2020.pdf

Susan Jennings. **We have reason to believe this technology has already harmed our son.**

Jennings\_Comment\_8-27-2020.pdf

Heidi Davis: I have another property where Eversource has the market share and is the only provider available. Eversource executive management has refused to provide the same opt out based on accommodations suggested by federal agencies available here for your considerations: US Access Board and Dept of Labor .

Instead **Eversource has plainly said that ..."if I want electricity at this property, I must submit to their RF meter or have no electricity"**

**This is a burden for my family as this chronic, long term exposure to the RF generated by the meter on my property provokes symptoms in my family member with a diagnosed sensitivity.**

Eversource's business practices must be evaluated as their discriminatory practices for those needing ADA accommodations, such as my family member, must end.

Davis\_comment\_8-27-2020.pdf

Vicki Simpson: Don't let the word smart cloud your judgement, nor the term "advanced meter functionality". Bill Bathgate details how very evil these meters really are for people's health, safety, and their privacy. Good for transferring data from your home, harmful to your very body and especially to the bodies of your children. "Smart" meters are a big mistake. And if **a utility commission does not look hard at the specific science showing harm it is not fulfilling its duty to the public.** Simpson\_comments\_8-26-2020.pdf

Shawn Haines. I am opposed to the MA DPU conducting a targeted smart meter/time of use billing pilot for EV customers. **There are overwhelming amounts of information that show negative effects including this link:**

<http://www.emfwise.com/smartmeters.php> Haines\_comments\_8-26-2020.pdf

Beverly Barnes: **My feeling is that the Smart Meters do not work well with solar and completely filled my home with dirty energy and we were getting transients on the internal wiring.** I believe that both the utility companies who mandate a wireless device on your home need to research the connections of solar to the smart meter so that those transients do not come on the homeowners wiring. The utility company should work with the homeowners and not make demands to make the changes unless they can smooth out the offensive transients. Barnes\_comments\_8-26-2020.pdf

Cynthia Price. **When safer technology is available (hard-wired fiber optics) which the public already paid for with increases on their phone bills in the 1990's for the Information Super Highway (we never got the fiber-to-the-home.....it was a bait and switch and the money was channeled into private for profit cellular companies)** and this safer technology backs up wireless, which is non-functional without fiber backup, than it is a crime to give the public the lethal technology backed up by the safe technology which they should have. (from Paul McGavin's research on the Information Superhighway) Price\_comments\_8-26-2020.pdf

Diane Muratore Testa. The independent science on the health effects of wireless radiation, particularly from cell towers, cell phones, Wi-Fi, and especially the latest fifth generation (5G) wireless technology, demonstrates that **low-level microwave signals cause harmful metabolic imbalances in all biological organisms. Last year, the U.S. National Toxicology Program's 10-year cell phone study concluded that there is "clear evidence" that cell phone signals cause cancerous heart tumors, DNA damage in the brain, and brain cancer. Dr. Neil Cherry of New Zealand studied the long-term health effects of living in the vicinity of a radio tower in San Francisco. His study concluded that cancer rates in children are up to 10 times**

**higher for those living in closest proximity to the tower. These are just a few of the thousands of scientific findings that have been published over the decades in the technical and/or medical literature.** Testa\_comments\_8-26-2020.pdf

Walter and Susan Cudnohufsky: **The over whelming worldwide research, and warnings by multitudes of independent scientists and experts demands that the Precautionary Principle be applied before any deployment of now known to be toxic smart meters. It must be proven harmless before deployment.** The fact that a growing number of countries, counties, cities and other political jurisdictions are temporarily or permanently banning implementation of smart meters and 5G, suggests the validity of their concerns and the conclusion of obvious reviewed evidence. It is only fraud and complicit acts that will allow this to go forward unchallenged. In addition The FCC RF GUIDELINES are grossly inadequate. Until the issue of safety for all ratepayers is addressed by the courts, the Commonwealth should not proceed with additional dockets involving wireless applications. Cudnohufsky\_comments\_8-26-2020.pdf

David Adams, Ph.D.: **I have also attached two additional documents detailing some of the documented harmfulness of so-called “smart meters”: a research paper by Ronald Powell, Ph.D on “Biological Effects from RF Radiation” and a statement by the American Academy of Environmental Medicine.** dams\_Comments\_8-26-2020.doc

Jodi Nelson; You will also be putting the population at risk on many levels and there are other reasons to stop allowing this infrastructure to be installed.

- **Lack of environmental impact study:** No environmental impact study was conducted, but plants, bees, and humans all seem to be negatively affected.
- **Lack of UL certification:** The smart meters are not UL certified as required by state electrical code.
- **Security risk:** They pose a risk to security since they can be hacked. Watch a video about the security threat. Apparently, it may take only 2 days to hack a smart meter, and water utility hacking may have already occurred.
- **Privacy risk:** They may be used for data mining or surveillance. For example, it is possible to tell from the electrical usage signature what type of appliance is being used, and therefore provide indicators as to when a person is at home or not, and how many people are in the home. People have been arrested based on information obtained from smart meters.
- **Fire risk:** They may be installed by improperly trained personnel, resulting in fire hazards when improperly installed. It was reported that a smart meter was related to the San Bruno explosion. In some cases, gas leakages were even discovered for smart meters.
- **Rate Hikes:** Electricity bills have reportedly increased significantly, rather than decreasing. Accuracy may also be affected by the temperature.
- **Health risk:** They pose a risk as a Class 2B carcinogen and many are experiencing health effects attributed to smart meters such as headaches, heart palpitations, tinnitus,

and sleeping disorders. The American Academy of Environmental Medicine, Santa Cruz Public Health Department, and Austrian Medical Association, have warned about the public health dangers of smart meters.

- **Interference:** They may interfere with pacemakers as well as other wireless devices in the home. Appliance damage has also been reported.
- **Lack of energy savings:** Some claim they do not actually result in energy savings, but may actually consume more power. Real energy savings requires changes in human behavior.
- **Lifespan:** The reported lifespan of the smart meter is 12-15 years, much lower than the 50 year lifespan of an analog meter. Throwing away good analog meters violates environmental principle of "reuse".
- **Cost:** The smart meter also costs more than the analog meter, which can be purchased for approximately \$50. The cost of the smart grid ultimately comes from the taxpayer and ratepayer.
- **Compatibility issues with alternative energy:** Smart meters have been reported to be incompatible with solar systems. <http://www.emfwise.com/smartmeters.php>  
Nelson\_comments\_8-26-2020.pdf

Noel Abbott Former Select Board Chairman Town of Rowe Mass:

Please use the precautionary principle and reject wide-scale development of this technology. There is a suicidal madness in moving forward. Once 5G is fully implemented it will be almost impossible to reverse course. Your decisions here will also affect the lives and health of your own families. **Please reject this technology until impartial conclusive studies are done to prove no harm.**

Abbott\_comments\_8-14-2020.pdf

Janet Johnson: **it is wrong for National Grid to gamble customer health by partnering up with the microwave/technology to cash in on big profits, while promising silly conveniences and gimmicks to customers.** Meanwhile my bills from National Grid bills over the last 7 years have exploded, while National Grid dallied with a failed cell tower system which they promoted as a gift to customers. In 2013 I paid \$.11 per KWH in the first 6 months, while in 2020, for the same period, I was charged \$.25 per KWH, plus an \$11 fine per month to have a non-emitting meter. In seven years, my electric bills have increased from about \$500 a year to about \$2000 a year.  
Johnson\_comments\_8-12-2020.pdf

Cece Doucette second comment: As Martin Luther King, Jr., noted, for meaningful societal change to be accomplished, it usually comes through three channels:

1. **The public becomes informed and speaks up for change.**
2. **Bad actors are held accountable in the courts.**
3. **Public Policy catches up to the science**

In summary, the proverbial wheels are coming off the bus for the wireless industry. With the lawsuits and clear scientific evidence of harm, it would be unwise to invest any more of the taxpayers' funding into wireless infrastructure.

Instead, **the policy paper, "Re-Inventing Wires: The Future of Landlines and Networks," details why the U.S. and our communities should instead invest in**

**hard-wired telecommunications and energy infrastructure to support economic growth, bridge the digital divide and diminish risks to security, privacy, public health and the environment.** It is time to hold the industry accountable for providing responsible solutions to the Commonwealth.

Doucette2ndCommentMADPU20-69081420.pdf

Kati Winchell: While placing smart meters at EV service stops/stations appears to support green goals, they, together with the controversial roll-out of smart meters for electric and gas meters, in conjunction with the trend toward all things wireless (IoT – Internet of Things), is forecasted to produce massive energy shortages in the near future:

**For specifics, I ask that you peruse these attachments:**

- **“Tsunami of Data”, The Guardian**
- **“Smart Meters, The Opposite of Green”, Common Ground Magazine**

**In addition to the enormous, aggregate energy drain of smart meters in tandem with other pervasive wireless devices, there is also the issue of the adverse health impacts that exposure to smart meters, devices and equipment produce.**

Kati\_Winchell\_comments\_8-13-2020.pdf

Patricia Burke: My concerns are as follows:

**Economic divide and insensitivity to prevailing financial hardships,** Against the backdrop of an increasing economic divide, financial insecurity associated with the covid crisis, and ratepayers struggling to pay bills for basic necessities, a pilot that offers a pricing differential to the highest income customers is an inhumane initiative. As increasing numbers of ratepayers are facing economic challenges due to covid, an EV pilot will cater to higher income groups while increasing costs to all customers.

**Unrealistic advocacy for vehicle to grid balancing, lack of recognition of battery degradation,** Many EV advocates champion the idea of ‘Vehicle to Grid’ charging. This involves vehicle owners feeding electricity back into the grid from their vehicle’s battery when electricity demand is high. Travers dismisses the concept, at least for residents. “This is unlikely to happen, not because it cannot be done but because it would be ridiculous to do. Firstly, many EVs will be on charge for 12 hours per day, and thus unavailable for supplying the grid. Secondly, it is hard to imagine why anyone possessed of a fully-charged EV would allow the battery to be drained when they might need the car at any moment, and when there was a shortage of electricity. “Thirdly, the battery is direct current (DC), but the grid requires alternating current (AC).

**Conflict minerals, e-waste, environmental impact, exploitation, and racial injustice** The transition to wireless meters, with reduced lifespans, results in unnecessary and avoidable resource consumption, energy consumption, and waste, and well as introducing surveillance and privacy risks.

Additionally, connected EVs introduce hacking risks to the grid.

**Questions about the adequacy of radio frequency exposure limits, nationally and internationally, as indicated by testimony to the FCC by the City of Boston, in 2013, and again in 2020.**

There are very serious questions about the adequacy of radio frequency exposure limits, as indicated by testimony to the FCC by the City of Boston, in 2013, and 2020

**The wireless industry and the utility industry did not responded appropriately to health complaints regarding smart meters and smart grid infrastructure.** The MA DPU was complicit in the corruption of health science and the abuse of human rights in its process regarding MA DPU docket 12-76, and MA DPU docket 12-76-B, in 2014  
**Fraud** Fraudulent results reporting for the Worcester pilot  
**Lack of disclosure and lack of transparency with communities or utility customers about the introduction of increasing radio frequency exposures**  
**Human rights:** Smart meter/smart grid installation discriminates against a health-vulnerable population  
**Concerns about health effects, and opt-out provisions**  
Comment\_of\_Patricia\_Burke.docx

Karen Rogers: **I have kept my Dad safe at home during this COVID crisis.**  
**Installation of a toxic utility smart meter on our home may harm him** right when we think he is safe. Installation on anyone's home may harm them. Smart meters are neither smart nor safe.  
Rodgers\_comments\_8-13-2020.pdf

MACI Mass. Asso for the Chemically Injured  
**Many individuals who suffer from chemical sensitivities are concomitantly vulnerable to the effects of EMFs and radio frequency RFR. The combination of sensitivities is quite dialing and puts their ability to work or live in their residences at greater risk and significantly affects their quality of life.**  
MACI\_Comments\_8-13-2020.pdf

Jonathan Mirin: We can have electric vehicles without adding to the toxic load of children, pregnant women and other vulnerable populations. Non-ionizing microwave radiation has been linked with cancer, DNA damage, sleep disturbance, attention/behavior issues, miscarriage, pollinator decline and more in 26,000+ independent studies dating back decades. A sample of this research has been collected at [bioinitiative.org](http://bioinitiative.org), [ehtrust.org](http://ehtrust.org), [mdsafetech.org](http://mdsafetech.org), etc.. **My wife developed microwave sickness in 2010 and has difficulty accessing basic services, entering federal buildings, shopping, receiving care in a hospital, working outside the home, etc.**  
**- The COVID crisis has highlighted society's responsibility to protect health-vulnerable individuals. The installation of smart meters discriminates against a portion of the population.** Mirin\_Comments\_8-13-2020.pdf

Joyce Frederick: **I am afraid the negative health effects of wireless radiation being admitted by these advanced meters is frightening and the fact that we cannot prevent them from being injected into our communities without impunity is also extremely frightening.** It is up to you to protect us law-abiding citizens who had been paying our taxes, taking good care of our property, acting with great civility, should not now, in our twilight years, be forced to accept toxic utility smart meters that are not necessary and most likely, hazardous to our health. Frederick\_comments\_8-13-2020.pdf

Ula Gadea: The COVID crisis has highlighted society's responsibility to protect health-vulnerable individuals. The installation of smart meters discriminates against a portion of the population. **Please note there is currently a petition online calling for the halt of MA smart meter deployment which, to date, has 2034 signatures.**

<https://www.change.org/p/halt-massachusetts-smart-meter-program>

There is second petition online calling for the passage of bill S.1988, which would allow all MA residents the right to opt out of smart meters. This petition currently has 1219 signatures. Gadea\_comment\_8-13-2020.pdf

Tom Valovic: I am opposed to the MA DPU conducting a targeted smart meter/time of use billing pilot for EV customers. **I don't believe that the health and safety of this technology has been adequately investigated.** Valovic\_Comments\_8-13-2020.pdf

Julie and Peter Farrell: We received a letter dated May 4, 2018 from TMLWP of their intention to charge us for the new AMI meter which we specifically stated we did not consent. Please see attached. Also attached please find a statement that was sent to TMLWP with our July 2020 payment. **To date we have had to pay for a meter that we did not consent to, as well as paying a large monthly meter reading fee**

Farrell\_Comments\_%208-13-2020.pdf

MassVocal: **We wanted to be inform of the specs and UL info on the meter , we also objected to easement of waves though our property to meter to meter , they have ignore us completely**

MassVocals\_%20Comments\_8-13-2020.pdf

Bill Maykel, DC; Jeanne Hubbuch, MD; Diane M. Testa, PhD, Western New England University; Kirstin Beatty, Co-chair, Last Tree Laws Massachusetts Ballot Committee; Janet Davis, Co-chair, Centerville Concerned Citizens; Nina Anderson, President, Scientific Alliance for Education; Kathleen Lynch, Westford Chapter Leader, Weston A. Price Foundation;

Sheldon K. Hines, Board Member & Treasurer, EMR Network:

First, the Department of Utilities is being negligent by failing to address the harm represented by non-ionizing electromagnetic radiation.

Secondly, the harm caused by installation of smart meters is a violation of human rights.

Thirdly, to provide evidence of harm for your review, incorporated by reference are the following materials

Fourth, the Department of Utilities must understand its part in the creation of ambient, intense, and chronic radiation from existing and proposed smart meter installations.

Fifth, proposing an economic incentive for the illusory smart meter vision of sustainability is a ridiculous waste of funds at the expense of ratepayers and economic justice.

Sixth, in footnote 6 of the docket, the Department of Utilities notes the intention to develop standards for EVs to charge during off peak hours and be available to deliver energy to the grid during peak hours.

Beatty\_et\_al\_comments\_8-13-2020.pdf

Alison Stafford McDonough

**Aside from the fact that Vehicle to Grid management of peak demand has been shown to be both economically and technically a "ridiculous idea"** [DPU docket notes footnote 6], the jury is in: wireless smart meter technology is not safe and if evidence of harm is still only coming from the world's laboratories, it is because we are not effectively looking for it in our general populations. The argument we are not hearing as much as we should be is that the time and money we invest in running after technologies that are going to keep on failing until we all die trying to make them work, is time and money we are not investing in deploying new, more robust and promising technologies like fiber optics (without which quantum cryptography will not work) and molecular robotics (without which emergent fiber optic solutions will not get in the ground). An industry overwhelmingly focused on the challenges of marketing and sales is grasping wildly at solutions that mounting evidence clearly indicates are not viable. It's not just that they've been proven unsafe - they don't work. Initial attempts to deploy so-called "smart meters" met with a long list of epic fails.

McDonough\_comments\_8-12-2020.pdf

**Ann Fish: I know numerous individuals who have been harmed by the deployment of smart meters costing them their health and their livelihood as they are no longer able to work. Just as the City of Boston has concerns about the inadequacy of radio frequency exposure limits, so do I.** In a statement to the FCC, the City of Boston has stated:

"Boston believes that the concerns of the public are real and that the Commission has done a disservice to itself, local government, consumers, and even the wireless industry in failing to understand and respond to the broadly shared mistrust of the safety of RF emissions." "The City, and many of its constituents, do not believe the cursory way in which the Commission simply reaffirmed its decades old standards in 2019 was based on a robust review of the record and an updating of the science. And until the Commission appreciates the educational component of its role as the nation's RF monitor, local governments, like Boston, will continue to be stuck in the middle as residents oppose wireless deployments for fear of the emissions, while the FCC and Congress have preempted local government review of RF standards."

As someone who has suffered from electromagnetic sensitivity, I strongly oppose the indiscriminate rollout of smart meter technology without sufficient investigation into its health effects and without a detailed plan for how to protect individuals whose health is impaired by their deployment.

Anne\_Fish\_comments\_8-12-2020.pdf

Chuck Matzger: The current COVID-19 crisis has highlighted society's responsibility to protect health-vulnerable individuals. But the data is showing damage is not just limited to the health-vulnerable, it's affecting the otherwise healthy as well. The installation of smart meters discriminates against a large portion of the population. **EMF is known to cause blood clotting, and COVID-19 is now known to also cause blood clots. This article, titled "COVID-19, Blood Clots, and Possible Exacerbation from Electromagnetic Fields (EMF): by Rob Brown, MD highlights the need to remove**



**EMF exposure from affected patients.** "It is now recognized that COVID-19 causes blood clots, both in arteries and in veins. The cause for this appears to be multifactorial. The virus damages the cells that line the blood vessels, the endothelium, and causes an immune response which, in itself, may cause increased viscosity of the blood." Where does EMF fit in? Doctor Brown goes on to cite evidence: "Evidence that EMF can cause a reaction in endothelial cells, increasing the risk for blood clot formation, was first described in 2004. EMF exposure may also induce Rouleaux formation, a reversible condition where red blood cells adhere to one another and become stacked, one on top of the other like a stack of coins. This phenomenon may occur with many conditions, including infections, connective tissue diseases and cancer. Rouleaux formation can be associated with increased viscosity of the blood and can cause the blockage of small arteries." Link to article here: <https://robbrownd.com/2020/05/covid-19-blood-clots-and-possible-exacerbation-from-electromagnetic-fields-emf/>  
Matzker\_comments\_8-12-2020.pdf

Nina Anderson: Our organization has been instrumental in the town of Sheffield in educating residents as to the environmental and health implications of AMI meters. **This ploy by the utilities to ride on the coat tails of EVs is a ploy to get AMIs accepted into general usage. There are numerous case studies of harm that these AMI meters do to the physical body, plant life and because their construction seems to be unregulated, their ability to catch fire has been noted. We strongly oppose AMI meters in any installation and especially when being pushed through this proposal to replace worn out AMR or analog meters.**  
SAFE\_comments\_8-12-2020.pdf

MT Patton: I have had cancer three times including chemo and radiation and do NOT want any wireless meters on my house as **the wireless are very unhealthy and keeps me from sleeping nightly. There were NO provisions to stop the wireless electric meter from going onto my house.** Patton\_comments\_8-12-2020.pdf

Cece Doucette: **Thank you for your earlier investigation into the Concerns about Health Effects from wireless technology as recorded in DPU 12-76-B p. 37-49, published on June 12, 2014. There have been many changes since then, and I appreciate this opportunity to update you**  
with:

- A refresher on how FCC public radiation limits were set (p. 2)
- New science concluding wireless radiation is biologically hazardous at non-thermal levels (p. 6)
- Current federal priorities and investigations (p. 18)
- State-level advances (p. 21)
- Legal and financial risks (p. 33)
- Solutions for safe technology (p. 36)

Based on these new facts, I hope you will agree it is not in the best interest of Massachusetts ratepayers to pay to have toxic wireless radiation-emitting utility meters installed on our homes, schools and places of work. Nor is it in the best interest of

ratepayers to pay to have wireless communication facilities (WCFs) mounted by the utility and telecommunications companies on or near residences, schools, health care facilities, parks and other properties where the public spends its time.

DoucetteTestimonyDPU18-28&296Sept2018.pdf

Janet Davis; I oppose any wireless technology being attached to my home without my consent. **I find it unconscionable that paying utility customers were not given an option of opting out and keeping their analog meters. I do not want this dangerous technology attached to my home just for the sake of convenience for the utility**

**companies.** Davis\_comments\_8-11-2020.pdf

Mauro DePasquale: I am opposed to the MA DPU conducting a targeted smart meter/time of use billing pilot for EV customers. **The covid crisis has highlighted society's responsibility to protect health-vulnerable individuals.** The installation of smart meters discriminates against a portion of the population.

DePasquale\_Comment\_8-10-2020.pdf

Helen Walker: In D.P.U. Order 12-76-B, the Department recognizes “that some individuals feel strongly that advanced meters will have a negative impact on their health.” The Department concludes that “the best balance of...factors is to allow electric distribution companies to include in their plans to achieve advanced metering functionality the broad deployment of advanced meters, but to require the companies to provide customers with an option to decline the installation of advanced meters.” The Order further stipulates that the opt-out requirement applies only to new advanced metering infrastructure installed in accordance with the provisions of Order 12-76-B. Now D.P.U. Docket 20-69 envisions the possibility of compulsory deployment of a whole new wave of advanced meters to replace existing meters at the end of their useful life or when replacement is needed for other reasons. D.P.U. 20-69 also envisions elevating existing AMR meters to advanced metering functionality to accommodate TVR. **The customer concerns about the health effects of wireless radiation emitted by the advanced meters are the same for Order 12-76-B and for Docket 20-69. It is imperative that Docket 20-69 include the requirement for companies to provide customers with an option both to decline the installation of new advanced meters and also to decline the upgrade of existing AMR meters to advanced metering functionality. This opt-out must apply to all advanced metering infrastructure to be installed or upgraded in accordance with the provisions of Docket 20-69.**

Walker\_Comments\_8-10-2020.pdf

William Bruno PHD: **Once a digital electric meter is in place, dirty electricity will be present on the wiring (easily detected using an AM radio) and, at a lower level, throughout the home. Even with the main breaker off, dirty electricity will still enter through the neutral wire which is never disconnected.**

A good article on dirty electricity, titled “Is Dirty Electricity Making You Sick?” was published by Prevention Magazine:

<https://www.prevention.com/life/a20460660/electromagnetic-fields-and-your-health/>

The article should be required reading for everyone, but especially for people involved in public health or utilities.

A research article in Bioelectromagnetics (“Human sleep in 60 Hz magnetic fields”, Graham and Cook, 1999, <https://pubmed.ncbi.nlm.nih.gov/10407512/>) found that **AC magnetic fields did not affect sleep when kept on, but did reduce sleep when switched on and off every 15 seconds. Modern “switching” power supplies are quite akin to switching the field on and partly off, typically around 30,000 times per second. The biological implications of this have not been very widely studied (most biologists know nothing about how electronics work, and most of the relevant funding sources are influenced or controlled by industries that would prefer to turn a blind eye to such problems;** one exception used to be the EPA research group, but their funding was explicitly zeroed out by Congress long ago). However, there have been several disturbing findings, some of which are cataloged here: <https://www.stetzerelectric.com/category/research/>.

Bruno\_comments\_8-10-2020.pdf

Template Response: Many individuals utilized portions of a template that was designed to provide an overview of many unaddressed concerns, noting;

I am opposed to the MA DPU conducting a targeted smart meter/time of use billing pilot for EV customers.

- The covid crisis has highlighted society's responsibility to protect health-vulnerable individuals. The installation of smart meters discriminates against a portion of the population.

- CONCERNS ABOUT HEALTH EFFECTS, AND OPT-OUT PROVISION:

Refer to D.P.U. Order 12-76-B, esp. pp. 36-38 and p. 48 ff.

In D.P.U. Order 12-76-B, the Department recognizes “that some individuals feel strongly that advanced meters will have a negative impact on their health.” The Department concludes that “ the best balance of...factors is to allow electric distribution companies to include...the broad deployment of advanced meters, but to require the companies to provide customers with an option to decline the installation of advanced meters.” The Order further stipulates that the opt-out requirement applies ONLY to new advanced metering infrastructure installed in accordance with the provisions of the Order.

Now D.P.U. Docket 20-69 envisions the possibility of compulsory deployment of a whole new wave of advanced meters to replace existing meters at the end of their useful life or when replacement is needed for other reasons. DPU 20-69 also envisions elevating existing AMR meters to advanced meter functionality to accommodate TVR. The customer concerns about the health effects of wireless radiation emitted by the advanced meters are the same for Order 12-76-B and for Docket 20-69. It is imperative that Docket 20-69 include the requirement for companies to provide customers with an option to decline both the installation of new advanced meters and also the upgrade of existing AMR meters to advanced meter functionality, for all infrastructure to be installed or upgraded in accordance with the provisions of the Docket.

- HUMAN RIGHTS If the DPU proceeds with deployment of infrastructure, the DPU should prohibit lack of accommodation (Eversource), or surcharging of medically vulnerable customers (NGrid), and insure that the opt-out meter is an analogue meter, with appropriate shielding of the premises if necessary, without punitive fees.

- SAFETY The City of Boston Weighed In, Twice, to the FCC, about Inadequacy of Radio Frequency Exposure Limits

"Boston believes that the concerns of the public are real and that the Commission has done a disservice to itself, local government, consumers, and even the wireless industry in failing to understand and respond to the broadly shared mistrust of the safety of RF emissions." "The City, and many of its constituents, do not believe the cursory way in which the Commission simply reaffirmed its decades old standards in 2019 was based on a robust review of the record and an updating of the science. And until the Commission appreciates the educational component of its role as the nation's RF monitor, local governments, like Boston, will continue to be stuck in the middle as residents oppose wireless deployments for fear of the emissions, while the FCC and Congress have preempted local government review of RF standards."

[https://ecfsapi.fcc.gov/file/1061793938659/COMMENTS\\_BostonMA.pdf](https://ecfsapi.fcc.gov/file/1061793938659/COMMENTS_BostonMA.pdf)

- ECONOMIC DIVIDE As increasing numbers of ratepayers are facing economic challenges due to covid, an EV pilot will cater to higher income groups while increasing costs to all customers. Owners of EVs are often divided into 2 groups, the environmentalist and the luxury EV owners. Luxury EV drivers will most likely not be sensitive to time-of-use billing, nor does the Commonwealth need to charge other ratepayers to provide lower cost charging for the higher income customers, and environmentalists are predisposed to adopting behaviors that are identified as sustainable without the need for costly, energy consumptive infrastructure. The DPU has not considered the option of outreach and education alone in order to cultivate desired behaviors.

- LACK OF PROOF OF CONCEPT The DPU docket notes in Footnote 6 the intention to develop standards for EVs to charge during off peak hours and be available to deliver energy to the grid during peak hours.

"Many EV advocates champion the idea of 'Vehicle to Grid' charging. This involves vehicle owners feeding electricity back into the grid from their vehicle's battery when electricity demand is high. Travers dismisses the concept, at least for residents. "This is unlikely to happen, not because it cannot be done but because it would be ridiculous to do. Firstly, many EVs will be on charge for 12 hours per day, and thus unavailable for supplying the grid. Secondly, it is hard to imagine why anyone possessed of a fully charged

EV would allow the battery to be drained when they might need the car at any moment, and when there was a shortage of electricity.

"Thirdly, the battery is direct current (DC), but the grid requires alternating current (AC). It is unlikely that any homeowner would be prepared to invest £800 in a DC-to-AC inverter to allow them to sell electricity, particularly since the sales value they will derive from doing so would be small. If your EV has cost £10 to charge at 15p/kWh, would you allow the grid to take half of that charge, if it had a value of only £5? The grid would have to pay an extraordinary premium to get someone to bother to connect their car up."

<https://www.transportxtra.com/publications/local-transport-today/news/66262/mass-evcharging-is-a-can-of-worms-hiding-under-the-bonnet->

- ENVIRONMENTAL IMPACT AND EXPLOITATION Evs, Conflict Minerals and EWaste The EV revolution will take batteries, but are they ethical?

The EV revolution has been racking up a whole supply chain of trouble around the globe related to an onslaught of often-contentious new mines opening to meet surging battery-metal demand, not to mention the coming tide of e-waste from old batteries. <https://www.corporateknights.com/channels/transportation/ev-revolution-needsbatteries-ethical-15795118/>

Ewaste and conflict minerals sustain exploitation of poorer nations, which is a form of racism and environmental injustice.

- **FRAUD** Massachusetts has not addressed fraud complaints regarding the National Grid smart meter pilot. The program was not successful in recruiting low income customers, (nor will the EV pilot); the process of community and ratepayer consent was abused, and the DPU continues to utilize Navigant to provide analysis, despite apparent corruption of results reporting to support decision-based evidence-making. Reparations have not been made to the Worcester community, including Tory Fort abutters who lost the property value of their homes due to the installation of nuisance infrastructure (environmental justice). Adverse health effects have not been independently monitored or investigated.. No further pilots should be conducted until the Worcester pilot is independently investigated, with restitution addressed, including removal of transmitting meters from non-consenting households, particularly non-english speaking ratepayers.

- **MALFEASANCE AND SCIENTIFIC MISCONDUCT** The MA DPU engaged the testimony of a professional mercenary tobacco scientist liar-for-hire, Peter Valberg, to override citizen complaints in 2014, and has made no effort to investigate further. This is both regulatory malfeasance and scientific misconduct. Independent researchers and clinicians have identified biomarkers and treatment protocols for electro-sensitivity, including prudent avoidance. Until the health risks posed by the technology are addressed, including the need to provide an analogue meter and to shield the premises from transmissions from neighboring meters, no further infrastructure costs should be incurred by MA ratepayers for smart meter pilot programs.

After the first round of comments, citizens had the opportunity to offer reply comments, Again, a template was offered, repeating some of the same concerns, and requesting that the MA administration hold the FCC accountable for its lack of investigation of safety guidelines. The second template was also submitted by a number of testifiers:

"I am opposed to the MA DPU conducting a targeted smart meter/time of use billing pilot for EV customers.

**INADEQUACY OF RF GUIDELINES:** Several lawsuits are pending against the FCC due to the inadequacy of RF exposure guidelines. The FCC has ignored reports of harm, as noted by the City of Boston in both 2013 and 2020 testimony. Until the issue of safety for all ratepayers is addressed by the courts, the Commonwealth should not proceed with additional dockets involving wireless applications.

**MALFEASANCE AND SCIENTIFIC MISCONDUCT:** The MA DPU engaged the testimony of industry-friendly scientist Peter Valberg (some refer to him as a professional mercenary tobacco scientist liar-for-hire), to override citizen complaints in 2014, and has made no effort to investigate further. This is both regulatory malfeasance and scientific misconduct.

**ACCOMMODATION:** The COVID crisis has highlighted society's responsibility to

protect health-vulnerable individuals. Until the health risks posed by the technology are independently investigated and addressed, including the need to provide an analogue meter and to shield the premises from transmissions from neighboring meters, no further costs should be incurred by ratepayers. The installation of smart meters discriminates against a portion of the population. Opting out of a meter at no cost must also be accompanied by expert shielding of the premises to accommodate health vulnerable ratepayers. The cost of necessary accommodation must be factored into any financial forecasts for benefits of wireless meters and infrastructure.

**FRAUD:** Massachusetts has not addressed fraud complaints regarding the National Grid smart meter pilot in Worcester. Instead, National Grid has passed these fraudulent results off to regulators in other states as a success. They are using this false data to justify infrastructure investment decisions, making the MA DPU and MA Clean Energy community complicit in defrauding ratepayers in other states, including RI and NY.

**UNADDRESSED RACISM AND EXPLOITATION AS THE RESULT OF "CLEAN ENERGY POLICY":** Concern about climate change is sourced from concern about health and the environment; therefore, any action taken to address climate concerns should be carefully vetted and monitored for health and environmental damage. As noted in the article, "What is environmental racism and why should we care about it," the clean energy movement is rife with unresolved issues ranging from conflict minerals to e-waste. "...examples include the mass shipment of spent American batteries to Mexico, where illegal waste dumps from plants operated by American, European and Japanese companies have resulted in soaring rates of anencephaly (when babies are born without brains). Environmental racism is part of the broader picture of systemic racism, which must be fought to bring about a fairer society." Clean energy policy should not advance on the basis of racism and exploitation of poorer nations.

Rather than investigating additional smart meter pilot programs, the MA DPU, utilities, Governor, Mayors, Attorney General, and citizenry should join efforts to ensure safe technology, and hold the FCC accountable for inadequate pro-industry regulation that endangers the economic vitality and health of the Commonwealth.

### **Public Servant's Comments:**

Office of the Attorney General: The Department's primary task in this proceeding is to evaluate the net benefits and overall feasibility of advanced rate design for electric vehicles (EV). The benefits of EV rate design include, but are not limited to, enhanced EV rates in the form of consumer savings, increased EV adoption, and reductions in greenhouse gas (GHG) emissions. The AGO respectfully requests that the Department convene technical sessions on rate design and cost issues associated with targeted deployment of AMI/AMF to EV customers. AMI and TVR Alternatives. Various parties make proposals that may be beyond the scope of the Department's current inquiry. **Prior to any technical session in this matter, the Department may wish to determine whether any of the topics below are appropriate for discussion, to best ensure informed participation by the parties:**

- o Load and congestion management (CLF Comments at 8–9; Greenlots Comments at 2–3; 4–5)
- o Increased DOER rebates for low-to-moderate income customers to obtain EVs (CLF Comments at 9)
- o Implementation of used-EV car sharing services in collaboration with community organizations in environmental justice communities (CLF Comments at 9)
- o **Potential health impacts of smart meter technology**  
AGO\_Reply\_Comments\_9-4-2020.pdf

Senator Diana DiZoglio, First Essex District;  
I believe it is important that the DPU continues to allow customers the right to choose which type of utility meter they would like installed and operated in their home or business. In addition to retaining this right, this decision should be of no cost to the customer. Senator\_DiZoglio\_letter\_9-1-2020.pdf

State Representative David P. Linsky, Fifth Middlesex District.  
I understand that as we look towards transitioning to renewable and sustainable energy sources it is critically necessary to update our electric grid, including our meters, to ensure Massachusetts has the infrastructure to support our energy goals. In commenting on D.P.U. 20-69, I would like to respectfully request that as the D.P.U. considers full or targeted deployment of advanced metering functionality, an opt-out provision under certain circumstances for individuals be included as part of the investigation.  
Rep\_Linsky\_Comments\_8-31-2020.pdf

Senator Michael Moore;  
I believe that customers should always be provided with a choice of the type of utility meter that is to be installed and operated on their place of residence or business. Not only should the ability to retain and operate an "electromechanical analogue meter" be allowed, this right should be provided at no cost to the customer. Many of my constituents suffer from various health conditions which require them to reduce their exposure to wireless devices and electronics.  
Senator\_Moore\_comments\_8-18-2020.pdf

#### **COMMENTS OF THE MASSACHUSETTS ENERGY DIRECTORS ASSOCIATION AND THE LOW-INCOME ENERGY AFFORDABILITY NETWORK**

A blanket policy to replace all meters with AMI remains not warranted at this time and could lead to increased utility stranded costs. Further, it is possible that in the near future, AMI would not be needed to achieve the ends that the Companies and Department seek. EVs and L2 charging stations are already equipped with technology to track details about vehicle charging. It may be possible to forgo AMI entirely at some point and rely on the technology already embedded in these vehicles to implement TVR or other incentives to charge off-peak, or in the home EV chargers that customers may choose to install.  
LEAN\_and\_MEDA\_comments\_8-13-2020.pdf

Massachusetts regulators appear reticent to confront the abuses of individual and community consent that occurred during the Worcester National Grid smart meter pilot, which was submitted in both RI and NY. It remains to be seen whether the Dept. of Public Utilities will hold a hearing on health effects, as the fox chomps on a chicken.

But one thing is clear...An increasing portion of the public is incredulous that such an unscientific, apparently corrupted, unsafe paradigm was unleashed under the guise of sustainability. Were smart grid concepts much more aligned with the citizen surveillance objectives of the NSA than anyone cares to believe? Will environmentalists have the courage and integrity to question the decisions they have made, especially those that have resulted in such extensive suffering?

And if the topics reported by the citizens "fall outside the scope of this proceeding," when and how does corruption finally get purged from regulatory decision-making? Keep an eye on Massachusetts to see if the Commonwealth ends up on the right side of history.