



February 20, 2024

State Corporation Commission
Public Utility Regulation Division
Chief Hearing Examiner, Alexander Skirpan
PO Box 1197
Richmond, VA 23218

SUBJECT: Reply Letter to Chief Hearing Examiner's Report, 1/17/2024, Part 4 of 5,
AMI Smart Meter Opt-Out Policy, SCC Docket Case No. PUR-2023-00101

Dear Mr. Alexander Skirpan, Jr:

The following comments are submitted on behalf of Virginians for Safe Technology (VA4ST) regarding the Chief Examiner's Report for Dominion Energy Virginia's (DEV) application for a 2023 Biennial Review of the company's rates, terms and conditions, Case No. PUR-2023-00101. Our comments relate mainly to Part 4 of 5, which discusses the State Corporation Commission's (SCC) comments and findings regarding Dominion Energy's Opt-Out meter policy and program.

Virginians for Safe Technology is a grassroots consumer advocacy organization whose mission is to promote the protection of current and future Virginians' rights to safe and responsible technology.

We acknowledge and appreciate the detail and effort you have undertaken in compiling the public's concerns and responding to our comments and those of other consumer advocacy NGO organizations and individuals. We hope these additional comments will be taken into consideration in the SCC's final order on this matter regarding findings #21-25 shown below.

1) "Therefore, I find Dominion Energy should be directed to undertake measures to provide information to its opt-out customers both directly by mail and on its website: concerning the process for opting-out or changing an opt-out election;"

In our written comments and our public testimony given on November 20th, [incorporated herein by reference](https://virginiansforsafetech.org/wp-content/uploads/2024/02/11-20-2023-Comments-on-Dominion-SCC-Petition.docx.pdf) (see <https://virginiansforsafetech.org/wp-content/uploads/2024/02/11-20-2023-Comments-on-Dominion-SCC-Petition.docx.pdf>), we stated we have a number of concerns with Dominion's current opt-out program website language, the language contained in their opt-out form, their verbal and written communications with customers, and their under oath testimony

before the Virginia legislature. We urge you to review these detailed comments and our recommendations on how the material provided to the public can be improved. We urge the SCC to have final oversight of the company's revised language and communications regarding the opt-out program to ensure that it is Americans with Disabilities Act (ADA) compliant, accurate and fully informs customers of their meter choices. Most importantly, oversight is needed to ensure that the opt-out form is not ambiguous in its meaning of a real non-communicating meter and that it is written in lay language that consumers can understand.

- Under the current program, customers are supposed to receive one postcard mailer notification of an upcoming meter change. However, we've received many reports that customers never received a postcard mailer prior to installation. Dominion should be required to notify customers through registered and certified mail and be able to document that a customer has been properly notified.
- The current postcard mailer does not include any information about the opt-out program. It's been our experience that customers only know about the opt-out program by word of mouth or if they happen to come across it on Dominion's website. When notifying customers of a meter change, Dominion should be required to inform the customer of the opt-out program and provide clear and concise information on how customers can request an opt-out for an AMI smart meter.
- There is an issue with consistency of information provided by Dominion regarding the opt-out program. Information and responses provided by Dominion to customers' needs to be clear and consistent across all forms of communications, including written communications, phone, Internet, and subcontractors of Dominion. Part of the confusion customers are experiencing lies with the lack of communication between Dominion and Aclara. Responses to questions and concerns, such as:
 - a. Whether customers will have an AMI meter installed by Aclara if they've called Dominion to opt-out,
 - b. The true meaning and definition of "non-communicating" meter (discussed below in greater detail), and
 - c. Why customers are still getting notices regarding AMI meter installation after emailing and calling Dominion to opt-out,
 - d. Several customers were recently told by Dominion they could keep their analog meter, which has not been communicated to most other customers.

To remedy these problems, Dominion needs to provide accurate and uniform information and responses across all forms of communication in order to eliminate confusion and improve customer service.

- The form to request an opt-out meter should be limited only to the request and not require a customer to agree to additional irrelevant terms. The language of this form needs to be clear, transparent, and easily understood by customers.
- Dominion characterizes its opt-out program as "interim." We are unclear as to what this means. We request that the SCC ask Dominion to explain the use of the word "interim" to describe the program.

- Dominion needs to define what a “non-communicating” opt-out meter is for customers. Specifically, it needs to inform the customer of the following:
 - Their definitions of “non-communicating” and “communicating” meters
 - How many antennas each meter has
 - If the opt-out meter has a network interface card
 - If the meters emits radio frequency radiation (RFR) and if so what level
 - If the meters put dirty electricity or ‘excess voltage’ on the wiring throughout the residence
 - How the non-communicating and communicating meters fit into the 5G Internet of Things (IoT)

2) “Therefore, I find Dominion Energy should be directed to undertake measures to provide information to its opt-out customers both directly by mail and on its website: concerning Information collected by AMI meters and how that information is used;”

- Dominion needs to clarify what customer information is communicated from AMI meters to Dominion and/or if their “non-communicating” meters are communicating information to a different third-party entity.
- Dominion should also be required to notify customers exactly what data is collected, who gets it and who has access to their information. Additionally, Dominion should be required to disclose any partnerships with data-using companies/third parties and how data will be stored or disposed of.
- According to former FCC Chair Tom Wheeler, the 5G mesh network, which includes smart meters, is inherently not cybersecure. (See https://www.brookings.edu/wp-content/uploads/2022/12/12092022_tom-wheeler-report.pdf). Knowing customer data can easily be hacked, Dominion should be required to tell customers what measures are being implemented to protect customer data and what steps will be taken if there is a cybersecurity breach.

3) “Therefore, I find Dominion Energy should be directed to undertake measures to provide information to its opt-out customers both directly by mail and on its website: concerning customer benefits of AMI meters.”

- Because of the potential for smart meters to damage human health and be easily hacked, it is not acceptable for a company to share the benefits of its product(s) without also sharing the risks. When there is risk, there must be choice.
- We refer you to VA4ST’s *Claims v. Truth* sheet (<https://virginiansforsafetech.org/wp-content/uploads/2023/02/Smart-Meter-Truth-vs.-Myth-2.4.23.pdf>) and a *Utility Meter Graph* (<https://virginiansforsafetech.org/wp-content/uploads/2023/01/VA4ST-Meter-Consumer-Graph-1.27.23.pdf>), which provides a concise comparison of the drawbacks of “smart” meters. This information can be used to provide the consumer with an

accurate summary of the benefits and disadvantages of each meter type. For example, Dominion contends that AMI meters save customers money, however, one of the biggest drawbacks of an AMI meter is that the customer pays for the operation of the meter, which runs continuously even when the home's breaker box is turned off; and in reality their bill often increases rather than decreases. By definition, AMI meters will eventually increase customers' monthly bills by at least 10-percent to pay for the operation of the smart meter.

4) Therefore, I find Dominion Energy should be directed to undertake measures to provide information to its opt-out customers both directly by mail and on its website: concerning why digital opt-out meters cannot communicate, and the Company's willingness to work with customers and investigate and coordinate independent third-party testing.

There is more than ample evidence to support our belief that Dominion's opt-out meters do communicate and therefore we strongly support third party testing. However, such testing must be defined and overseen by the SCC in order to ensure customer confidence. We respectfully request that the SCC participate in the identification and selection of credible independent third-party testing companies. It is critical that the customer be allowed to agree on the company contracted with and that they have equal access to the data in real time.

5) Therefore, I find Dominion Energy should be directed to undertake measures to provide information to its opt-out customers both directly by mail and on its website: the level of EMF emitted by an AMI meter, and how that level of EMF compares to other sources of EMF likely to be found in a residence, such as a microwave oven, hair dryer, Wi-Fi router, or cell phone.

While we appreciate the SCC attempting to resolve the disagreement over the amount of radiation emitted from smart meters in comparison to other household appliances and cell phones, this is not an easy undertaking and one that is outside the scope of Dominion's expertise. Comparing the radiation emitted from one AMI "smart" meter to a cell phone, or other electronic devices is complicated due to the nature of "smart" meters and the mesh networks they create. For example, the amount of exposure an individual is exposed to from a "smart" meter depends on whether the person lives inside a home with one meter or in an apartment where a bank of meters is located.

Rather than have Dominion conduct this exercise, we strongly recommend the convening of an SCC panel made up of unbiased leading experts in the field of engineering and EMF exposure that could investigate this issue. This would have the benefit of making this information accessible to Virginia's other electric companies and provide the public with unbiased results. Below is a summary of just a few of the reasons for this recommendation - each of these is discussed in a more detailed summary and response here <https://virginiansforsafetech.org/wp-content/uploads/2024/02/AMI-Meter-v-Cell-Phone-FINAL.pdf>

- Dominion routinely relies on the outdated 2014 Electric Power Research Institute (EPRI) to claim that an AMI "smart" meter emits less radiation than a cell phone. This obsolete report looks at one single "smart" meter and not the entire "smart" meter network. It erroneously cites "that a smart meter is no worse in emissions than a toaster." Customers are exposed to much more than one "smart" meter in their home. AMI meters located on adjacent properties to each customer can result in asymmetric radiation patterns that penetrate bedrooms and other dwelling spaces when there is a common

alley between those two adjacent houses, greatly increasing the RFR levels that one customer is continuously exposed to 24 hours a day, seven days a week. These RF mesh pathways crisscrossing through homes are unlike any other source of EMF/RFR in today's household.

- Continuing to rely on the EPRI report about how a smart meter behaves no worse than a cell phone and a toaster is a misrepresentation of the household devices currently on the market. This is especially true with the development of smart toasters (and other household appliances) that contain RFID chips which now produce RF signals like an AMI meter. In addition, some of the latest versions of iPhones have been banned in France for being considered to have unsafe radiation levels or some have batteries that overheat.
- Radiated skin surface area and dwell time must be in equal units. Mr. Daniel Hirsh, a retired director of the Program on Environmental and Nuclear Policy at the University of California, Santa Cruz, advises to use correction factors to account for the difference in: (1) the skin surface area that the RFR is radiated upon and to take into account (2) the radiation exposure time differences between the smart meter and other EMF sources in the residence which are both cumulative. Whereas a cell phone is used only intermittently on the average maybe several hours a day, a "smart" meter is on 24/7, resulting in the smart meter in this scenario being far worse in RFR exposures than a cell phone:

"When you correct for these two facts, the whole body and cumulative, rather than the cell phone being 100 times more exposure than a smart meter, the smart meter turns out to be roughly 100 times more exposure than cell phones."¹

- In addition to the radiation issues, [forensic fire reports](#) from independent parties cite other dangers regarding the RF mesh of AMI meters that have largely gone unaddressed by Dominion. "Smart" meters are known to cause fires, whereas cell phones are not.

6) Comments on the Medical waiver: "The Company should be directed to evaluate the possibility and workings of a medical waiver of any future AMI opt-out fees."

"Electromagnetic Sensitivity (EMS) is a [federally recognized](#) condition in which individuals suffer adverse health effects due to electromagnetic field (EMF) exposure. It is also commonly referred to as Electrosensitivity, Electrohypersensitivity (EHS), microwave syndrome/illness and radiofrequency sickness. [Common symptoms](#) of EMS include sleep problems, fatigue, exhaustion, lack of energy, restlessness, heart palpitations, muscle and joint pain, headaches, difficulty concentrating, anxiety, dizziness, tinnitus, and sensations of pressure in the head and ears." For a comprehensive understanding of how the daily life of those who are EHS is impacted by lack of accommodation by governmental agencies (such as housing), please see <https://drive.google.com/file/d/18oVEDKrc2IFex-cuZW763UwiVeZlmRP3/view>.

¹ <https://ehitrust.org/educate-yourself/health-risks-posed-by-smartmeters/>

The SCC must recognize EMS as a medical condition and impose regulations on Virginia's power companies to require that they provide appropriate accommodations for EHS individuals.

The U.S. Access Board, an independent federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards, stated in the Background for its Final Rule [Americans with Disabilities Act \(ADA\) Accessibility Guidelines for Buildings and Facilities; Recreation Facilities:](#)

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

According to the Electrosensitive Society: “It is believed that between 1% and 5% of the population in developed countries may have severe symptoms and be debilitated when they are exposed to electrosmog. An additional 35% may have mild to moderate symptoms that allow them to work but reduce their quality of life. Many of these people are unaware of their sensitivity and repeatedly seek medical care.”²

In Virginia, this would mean that out of the 2.6 million Dominion customers, an average of at least 78,000 households with one or more members have this severe condition, and an additional 910,000 households in Virginia could be mildly to moderately affected.

Despite the prevalence and seriousness of this medical condition, we are disappointed in the SCC's failure to acknowledge the immediate need to address this issue and implement a remedy to affected Virginians. Rather than evaluate the possibility of a waiver, the SCC should require the initiation of a medical waiver process with a strict timeline.

We offer the following as a very recent example of why such direction is needed. This week we learned that Dominion Energy has communicated to one of its customers who is severely EHS that “Regarding EHS, please recognize that EHS is not a recognized medical condition – and that EHS is insufficient to support any claim (or request) for accommodations under the Americans with Disabilities Act. Respectfully, Dominion Energy has not engaged in any discriminatory conduct in relation to your alleged condition. While we appreciate that you have completed a Serious Medical Condition Certification Form, the fact remains that your stated diagnosis isn't one that is medically recognizable – and isn't one that entitles you to have an AMR meter at your home, or to demand that non AMI meters be located within 1,400 feet of your residence.” A copy of the entire letter is attached. Please note that the letter makes reference to the customer's SCC complaint to the SCC and that Dominion has not yet been contacted by the SCC.

In addition, we have received a great deal of feedback from the public that they have tried to make use of Dominion's [Serious Medical Condition Certification Form](#) to obtain relief for their EHS condition and their requests have been declined.

² <https://www.electrosensitivesociety.com/how-many-people-suffer-from-ehs/>

It is clear there is no current process in place for Virginians who suffer from EHS to obtain relief from the effects of “smart” meters and that from Dominion’s most recent response that they have no indication of implementing a process.

We urge you to direct Dominion to adopt a program similar to one used by Duke Energy in North Carolina (See <https://starw1.ncuc.gov/ncuc/ViewFile.aspx?NET2022&Id=5a9371bf-4f6e-4943-8b91-6e28ace9ed24>) in which an EMS individual can obtain relief by submitting a notarized form (See <https://www.duke-energy.com/-/media/pdfs/our-company/dec-required-medical-release-form.pdf?rev=e30d7f44ec084bc181257d70f7b16d79>) and a form signed by a licensed physician (See <https://www.duke-energy.com/-/media/pdfs/our-company/dec-example-physician-verification-statement.pdf?rev=e0f01c5fce5a489fa5c82df864372089>) that affirms the patient must avoid exposure to radio frequency (RF) emissions to the extent possible to protect his or her health.

The company does not employ medical professionals who could capably establish medical criteria to determine customer eligibility and would not be able to make a fair and unbiased determination for those customers who might be eligible to receive this benefit. The SCC should consider the formation of an independent panel made up of affected individuals and credentialed medical practitioners with experience in diagnosing and treating EMS individuals to develop a sound and fair medical waiver program.

When the opt-out policy is updated as a result of the order issued on this docket, we strongly encourage the SCC to require Dominion to expand the opt-out meter choices to include a refurbished analog meter and a landline phone connection meter. We’ve been informed that Dominion is refurbishing and selling the analog meters they are taking off customers’ homes. We anticipate there will be a need for a large supply of analog utility meters, and the SCC should require Dominion to keep an appropriate inventory for the customers who want to opt-out, especially the disabled.

We urge the SCC to require Dominion Energy and other electric companies throughout the state to provide immediate relief to Electrohypersensitive (EHS) Virginians by implementing a functioning medical waiver process that includes ADA accommodation for their safe access to electricity and will provide for non-discriminatory public policy.

7) Comments on the Definitions of “Communicating” and “Non-Communicating”

Since the start of the “smart” meter roll out, Dominion Energy has made many different statements regarding the communication capability of its meters. Based on feedback from the public, we now believe that Dominion Energy deceptively defines “non-communicating” to only mean that the meter does not communicate directly with Dominion. As a recent example, Dominion responded to a customer regarding the communicating capability of an opt-out meter, the company stated, “It is a meter where Dominion receives none of the data.” Such language necessitates that the SCC specifically define “non-communicating” to mean that the meter is not capable of transmitting information to Dominion *or* another entity.

In addition, we also recommend the SCC clarify whether Dominion uses the terms “communcaiting” and “transmitting” interchangeably. As stated previously, independent testing has determined that the opt out meters are indeed transmitting. Please recall that, in his testimony, Mr. Bill Bathgate stated that an opt-out meter placed on the home of Ms. Jill King was communicating. Shortly after that hearing, Ms. King began communicating with Dominion Energy regarding her meter. She has repeatedly asked Dominion why her meter is

communicating and to date, despite repeated requests, they have refused to answer that question. Please see the attached document that shows the chronology of Ms. King's conversations with various Dominion representatives.

8) Comments on the Physical Characteristics of the AMI Opt-Out Meter

Another unresolved issue that the SCC must address is the myriad of statements by Dominion on the physical characteristics of its AMI opt-out meter. In some instances, Dominion states that one antenna is disabled and the other is still transmitting 900 MHz, just like an AMR meter. In other instances, cited to both customers and legislators, Dominion states both antennas are removed from the AMI non-communicating meter, meaning there is no circuit card.

AMI meters are defined as:

“AMI (Advanced Metering Infrastructure) is a two-way communication system to collect detailed metering information throughout a utility's service industry. AMI is typically automated and allows real time, on-demand interrogations with metering endpoints. FERC defines AMI as “A metering system that records customer consumption hourly or more frequently and that provides for daily or more frequent transmittal of measurements over a communication network to a central collection point.”³

The inclusion of the term “AMI non-communicating” when Dominion defines its opt-out meter is confusing and misleading because of the basic definition of an AMI meter. We would like a consistent and accurate definition of what Dominion is defining as a non-communicating AMI meter based on its physical components.

In order to provide all Virginians with a consistent definition, we urge the SCC, rather than the utility companies, to provide the definition of a non-communicating opt-out meter, which we believe must have the following characteristics:

- No transmitting or communicating antenna(s) installed
- No network interface card/circuit card
- Does not emit any RF radiation
- Does not include the non-communicating unless the characteristics above have been met

9) Comments regarding the statement “AMI Meters do not use electricity in order to operate”

On page 202, it is stated “Mr. 1562 Hinckle testified AMI meters do not use electricity in order to operate.”

This is false. In an AMI meter, the oscillating chip that converts 240 Volts AC to lower voltage, like 12 Volts DC is used to power the switch mode power supply (SMPS), which in turn provides

³<https://www.eaton.com/in/en-us/products/utility-grid-solutions/advanced-metering-infrastructure/fundamentals-of-ami.html>

the voltage for the antennas and electronic circuitry.⁴ The noise or dirty electricity generated by this conversion from AC to DC can increase monthly utility bills by at least 10-percent.

This increase is due to the high frequency transients from the switching function and are what is recorded every 15-minutes as a basis for the billing charges. The transients - which are the highest voltage recorded during that time period - is electricity that the homeowner doesn't use but must pay for. This was not the case with either AMR or analog meters which don't use an SMPS.

10) Comments regarding the cost comparison of an Opt-out meter without a circuit card versus an AMI meter with a circuit card (called "network interface card" or NIC)

An opt-out meter without a circuit card creates savings that should be accounted for when doing a full cost allocation analysis because the circuit board is one of the higher costs of the AMI meter, both to manufacture and maintain. The opt-out meters without circuit cards are less expensive in the long term to maintain than the AMI "smart" meters, and monthly readings are not necessary. Mr. Miller gave Dominion testimony admitting that Dominion could not split out the administrative costs between the AMI and opt-out meters. However, if there is a circuit card in one and not in the other, there should be a clear differentiation between the cost of the two. When Dominion does a truly representative cost allocation analysis and considers these long term cost credits for the analog opt-out meter, or even AMI meters without circuit boards in them, we ascertain that the company will get very different results than \$10.35/month up to the arbitrarily selected full cost of \$31.04/month.

We would like to know if Dominion is including these hidden savings in their 'full cost' analysis and giving opt-out customers circuit board credits for the six technology refreshes the opt-out meters will not need for the next 30 to 40 years.

There are other opt-out utility meters to be considered that have hidden savings. A landline phone connection for example, such as the one offered by Duke Energy in North Carolina, is also a viable opt-out meter that may have similar cost savings as an AMI meter without a circuit card. (See <https://www.govtech.com/health/dont-want-a-smart-meter-get-a-doctors-note.html>.)

Another option, which is currently used by Southside Electric Cooperative in Virginia which does not communicate or have the antennas or circuit board installed, is the FOCUS 2SCL200 240V 3W 60Hz TA=30 Kh 7.2 Please see the attached PDF of this model.

Concluding Comments

In its response to the SCC's report, Dominion stated it respects the views of customers on this issue and respects their ability to opt-out of AMI participation, but that "it should be acknowledged that the public witnesses testifying with respect to AMI concerns in this proceeding reflect an infinitesimally small percentage of the over two million customers with a deployed AMI meter" and "To date, the Company has deployed approximately 2 million AMI meters. The number of public witnesses expressing concerns about AMI meters, which included 33 live witnesses and 190 written comments, represents only a tiny fraction of these customers—^approximately 0.0001115%."

⁴ <https://stopsmartmetersbc.com/wp-content/uploads/2016/08/LandisGyr-Smart-Meter-An-Inside-View-by-Dan-Mattson.pdf> . Mattson, Dan. *The Landis + Gyr Smart Meter: An Inside View*. November 8, 2015.

Unfortunately, the majority of Virginians are completely unaware of the health hazards and the increased costs associated with AMI “smart” meters. Further, Dominion’s customers were not informed of Dominion’s request to charge opt-out customers an additional fee. Had Dominion been required to officially notify its customers of the health hazards and the increased costs of AMI “smart” meters at the start of the “smart” meter rollout and of this opportunity to comment, we believe many more members of the public would have commented and expressed opposition to the opt-out fee. For these reasons, it is inaccurate and inappropriate to contend that only a few customers are concerned with the proposed opt-out fee.

Across the country, consumers are working to maintain choice when it comes to the type of utility meters placed on their homes. Legislation is being introduced (see <https://www.nysenate.gov/legislation/bills/2023/S5632/amendment/A>, <https://www.senate.mo.gov/24info/pdf-bill/intro/SB1167.pdf>, and <https://malegislature.gov/Bills/193/S2152> for three recent examples) and passed that requires power companies to provide safer alternatives. Large power companies are providing their customers with the option to opt-out to analog meters, such as in California (see PG&E <https://www.pge.com/en/save-energy-and-money/energy-saving-programs/smartmeter/opt-out-program.html> and Southern California Edison <https://www.sce.com/customer-service/my-account/smart-meters/opt-out>). Michigan residents get the option of having a digital meter without any antennas and without a circuit card installed. Virginians deserve a power utility meter option that does not have transmitting or communicating antennas installed, does not have a network interface card/circuit card, and does not emit any RF radiation; and customers with EHS should not have to wait two years in order to experience relief from daily RFR exposures which significantly adversely impact their way of life, or are potentially lethal.

We urge Virginia’s SCC to be a leader in the effort to protect consumers from the dangers and higher costs of “smart” meters.

Thank you for the opportunity to submit this letter.

Respectfully,

Virginians for Safe Technology

Jenny DeMarco

Mary Bauer

Anastasyia Seres

Attachments:

- 1) Virginians for Safe Technology Fact Sheet Claims v. Truth
- 2) Virginians for Safe Technology Fact Sheet Utility Meter Graph
- 3) January 23, 2024, Dominion Energy letter to customer regarding notice of consent

- 4) Summary of correspondence between Ms. King and Dominion Energy
- 5) PDF of Opt-Out Meter Used by Southside Electric Cooperative



	Two-way Communicating Smart Meter	Non-Communicating Opt-Out Meter	Electromechanical Analog Meter
Does not emit radio frequency radiation (RFR) and does not communicate wirelessly	X	X*	✓
Does not have a switch mode power supply** which puts dirty electricity*** and interference on electricity wiring throughout the home	X	X	✓
Has proper surge protection and grounding to mitigate fire risk	X	X	✓
Makes it possible to save money on your electricity bill	X	X	✓
Data secure - cannot be <u>easily</u> hacked	X	X	✓
Does not track or store detailed private electricity use data in the home	X	X	✓
FCC compliant when in operation	X	X	✓
Meter performs as advertised by power companies	X	X	✓
Has a lifespan longer than 7 years	X	X	✓
Number of antennas in meter	2	2*	0
Currently offered as an option to Virginians for their homes	✓	✓	X

* RFR emissions for non-communicating Opt-Out meters depend on whether or not one or both of the antennas are: (1) disabled; or (2) in receive mode only; or are physically uninstalled. Most DEV Opt-Out meters installed prior to 2022 were only disabled by using unreliable software settings that were easily reset to become communicating smart meters without the customer's knowledge. In 2022, DEV alleged new smart meter installs were purchased from Landis & Gyr with both antennas physically removed from the meter, but this is not reflected in the Opt-out form customers are asked to sign and at least half of the customers' installations had by this time already taken place.

** Switch Mode Power Supply (SMPS) is the part within a digital meter responsible for switching AC to DC and DC to AC. Every time it switches, it puts dirty electricity on the wiring throughout the house.

*** Dirty electricity is "when the electrical power lines and wiring within your home contain frequencies other than the normal 60 Hz electrical current (50 Hz in Europe). These additional frequencies piggyback on the electrical wiring and radiate into your living environment." (<https://www.emfanalysis.com/what-is-dirty-electricity/>) "Dirty Electricity creates poor power quality, has led to early home appliance failures, industrial equipment control failures, GFI outlet failures, pulsating and flickering lights. Besides the likely cost of thousands in appliance damage there are also serious detrimental health effects." - Bill Bathgate (defiltersllc.com)

BASIC INFO AND SOLUTIONS

**All underlined text are hyperlinked resources*



WHAT ARE SMART METERS?

The Environmental Health Trust states, "Smart meters are the new utility consumption measurement devices for electricity, water, and gas that are being installed across the nation, at residences and other buildings. There would be a separate meter for each type of utility and they are installed by the companies and governments that provide the utilities."

WHY ARE CUSTOMERS CONCERNED ABOUT SMART METERS?

Power companies are misrepresenting the reality of smart meters and forcing customers to get them regardless of their negative health impacts they are having. Virginia customers are led to believe that their only options are a smart meter or a opt-out smart meter, and now being threatened to have their power cut off when they express they'd like to keep their electromechanical analog meter or the ability to have one as an opt-out choice.

Smart meters violate residents/consumers on many levels - below are just a few:

- There is no informed consent prior to receiving a smart meter
- There is no disclosure of the smart meter risks involved in their installation and operation
- Smart meters are fire hazards (not UL certified)
- Smart meters have the ability to track specific energy usage within our homes (when we turn off the lights, when we flush the toilet, when we use the fan, etc.)
- Our data garnered by these smart meters can be used/sold without our consent
- Smart meters are part of the IoT mesh network created by all of the wireless "smart" devices and cell phone towers
- Smart meters are easily hacked
- Smart meters allow our electricity to be controlled by a push of a remote disconnect button, which means customer power is completely at the mercy of the powerful public utilities
- Smart meters are installed hot and many times without informing the homeowner first
- Subcontractors hired to install most of the smart meters are not licensed electricians

SOLUTIONS

- Take immediate legislative action to offer a state wide opt-out that includes electromechanical analog meters and non-wireless ethernet connection meters.
- Waive all fees for any opt-out selected for the meter itself, its installation, and continued operations.
- Mandate Dominion and other power companies to revise their RFR and Smart Meter Fact Sheets to be factual without industry bias and misrepresentations. (See Dominion Smart Meter FAQ's here: <https://www.dominionenergy.com/projects-and-facilities/electric-projects/smart-meter-upgrades-va/smart-meter-faqs>)
- Acknowledge that adverse harm can happen from low level radio frequency radiation (RFR) that is well below the FCC RF Safety Guidelines for thermal heating of tissue and that the effects are cumulative.
- Require all Virginia state procurement contracts for AMI smart meters to include a dirty electricity filter in the low kHz range for the switch mode power supply (SMPS).
- Require disclosures for conflict of interest in any health data that is used to make a claim that smart meters are safe.
- Create smart meter free safe zones (radiation-free areas) to protect those that are most vulnerable: school children, pregnant women, elderly, disabled, and those who are EMS, etc.
- Plan for installing Ethernet wired utility meters in the next 2-5 years as the smart meters fail or expire. These Ethernet meters have the capability for distributed energy resources, without the wireless connectivity, and are called Intelligent Energy Meters.

WHAT ENERGY COMPANIES ARE CLAIMING*

THE TRUTH



Smart Meters are better for the environment.

- Dominion and others claims "smart" meters have less impact on the environment because they use less fossil fuel energy by not driving around and checking the analog meters. This statement is telling people to focus on one thing in order to completely ignore the fact that these meters emit radio frequency radiation (RFR) which is a Group 2B possible carcinogen and air pollutant as recognized by the telecom insurance industry (such as Swiss Re and Lloyds of London)
- Radiofrequency Radiation (RFR) is not good for the environment. The Communications Technology industry is slated to be using 51% of global electricity by 2030 and "smart" meters communicate up to 190,000 times a day, which is creating an RF mesh bubble all around our homes 24/7.
- Per the FCC, smart meters can consume up to 1W per household to complete their RF mesh operations. Using Dominion as an example, the corporation now has 2,589,754 million customers in the state of Virginia. This means Dominion is environmentally responsible for consuming more than 2.5 million more watts due to smart meters - and the greenhouse gasses that result from producing that additional power - so even if there is less fossil fuel being used for Dominion's trucks, it hardly offsets the toxic dumping of RF radiation pollution. The same goes for all power companies within the state and all other utility meters such as water and gas, which are operating at a much lower power level to support the IoT mesh network.
- RFR is not monitored by the EPA like other air pollutants. As the quality of our air continues to become more saturated with this wireless radiation, there is no one monitoring this air pollution and the the adverse health effects that result in each household by being exposed to unnecessary low levels of RFR in close proximity to the meter 24/7.
- There will never be "energy efficiency" as long as there is dirty electricity being generated by these smart meters in violation of FCC Part 15 interference rules.
- Smart meters have a life span of 5 to 7 years versus electromechanical analog meters, which last at least four decades if not more. These devices are now computers and they have to be maintained. Where will all of this unusable equipment go if not back into the environment?

Smart meters are designed to bring customers new levels of convenience and control.

- The opposite is true. Smart meters allow companies to turn off customer's power with a push of a button (unlike electromechanical analog meters) for reasons other than non-payment of bill and to know everything that goes on in the home. The Green Button Technology Alliance claims that Connect My Data (CMD) technology is the only way to get real-time data through software applications on wireless user devices such as cell phones. The security of our data is questionable, and third parties are given unfettered access to "unlock" utility data supposedly conditional upon the unknowing customer's electronic authorization.

Your data is secure [with a smart meter].

- See this January 7, 2022 State Corporation Commission order (page 11) where the Walmart asks to bypass the customer in order to send the customer's interval data directly from Dominion to the third party vendor using "Connect My Data" green button functionality which purports to to deploy "privacy by design" software." However, any 3rd party vendor may be able to "unlock your utility data" for software application purposes.

WHAT ENERGY COMPANIES ARE CLAIMING*

THE TRUTH



Your data is secure [with a smart meter] (continued)

- See summary provided on hacking a smart meter by 'Hash', the Texas hacker. This hacker demonstrates how easy it is for an individual with the right equipment to intercept the smart meter data transmissions and decode the usage and location data that are attached to it. Each smart meter creates a node that can be hacked and include multiple customers' data by relay. It is also unclear as to how customer data will be used, as third parties are already making requests for direct access. These third parties are using voluntary customer authorization to access customer data and can potentially transition to an involuntary forfeiture of customer authorization in order to control resource distribution remotely.

Smart meters can measure energy usage in small intervals throughout the day, enabling [energy companies] to offer voluntary pricing plans with rates based on time-of-day usage, giving you even more control over your energy costs.

- Customers will not save money by having a smart meter on their home. Smart meters increase electricity bills because the customer has to pay for the dirty electricity voltage transients on the line, which adds about 10% more electricity to the bill. (Bill Bathgate, Michigan House Energy Committee Testimony, 2018). The voltage spikes make it look like the customer is using more electricity when they're not because the meter itself is using this electricity. There are reports of bills arbitrarily increasing - even doubling in one instance - and the companies claim this is due to customer usage when it could be the smart meter.
- Smart meters allow companies to offer "time-of-day usage" suggestions because they will have 24/7 access to how much power we are using, when we are using it, and which devices are turned on within our homes. This is an invasion of privacy.
- The Federal Wiretap Act and Stored Electronic Communications Act legally requires consent for installation of any surveillance device and any device that will collect and transmit private and personal data to unauthorized parties for unauthorized purposes. Authorization for sharing of personal and private information may only be given by the originator and subject of that information.

Smart meters are safe.

- The smart meter has insufficient electrical protections to prevent overheating, has no ground or surge protection and becomes an incendiary device on your house - Remote disconnect switch has a material defect that has not been fully mitigated where it easily overheats due to poor switch contact or cannot handle power surges when power is restored after an outage. This can result in arcing, sparking, popping and fires. (See Norman Lambe's Century National insurance risk management report for these details).
- Stockton, CA, 2015: A high voltage power surge from a damaged utility pole made smart meters explode turning the smart meters and plastic covers into projectiles. Residents reported it shaking their homes and sounding like a bomb went off. This explosion resulted in 5,800 homes (10%) losing power, about 60 which were significantly damaged.

WHAT ENERGY COMPANIES ARE CLAIMING*

THE TRUTH



Smart meters are not on all the time.

- This is a misrepresentation of how smart meters work because it's not one single period of time in which the transmissions take place, there are continuous pulses throughout the entire day/night.
- The power companies indicate that data usage transmission only takes place twice an hour, which means the majority of the [up to] 190,000 pulses per day by the smart meter is for RF mesh maintenance (not for electricity usage data transmissions).
- The biological effects of these "erratic bursts of modulated microwaves, typically produce relatively potent and very short pulsed RF transmissions which have never been fully tested." The millisecond-long daily transmissions and a peak level emission two and a half times higher than the stated safety signal.
- Power companies don't take into account the low levels of RFR radiating 24/7 coupled with dirty electricity and the cumulative exposure effects of these erratic pulses over time.

Smart meters won't affect your health.

- The FCC RF maximum permissible exposure (MPE) safety limits are some of the highest in the world and power companies are not acknowledging that these safety limits were found to be arbitrary and capricious by the DC Court of Appeals in August 2021. 11,000 pages of evidence were submitted into the FCC record during this court case showing significant injuries can happen well below the current FCC RF safety guidelines. This means power companies still are not acknowledging these legal findings and only address the MPE health damages that can result from thermal heating. Who is protecting us?
- Smart meters conduct voltage transients or dirty electricity in the 2-50 kHz range which is within the frequency range that ICNRP, the FCC, and IEEE officially recognize as neurologically stimulating in humans.
- ICNRP cites that established adverse effects in individuals "exposed to low frequency magnetic fields are the stimulation of central and peripheral nervous tissues and the induction in the retina of phosphenes, a perception of faint flickering light in the periphery of the visual field." (Guidelines for Limiting Exposure to Time Varying Electric and Magnetic Fields (1 Hz TO 100 kHz), PG. 819. 2010)
- "In addition to nerve stimulation, radio frequency EMFs can affect the body via two primary biological effects: changes in the permeability of membranes and temperature rise." (ICNRP Guidelines for Limiting Exposure to Electromagnetic Fields (100 KHZ TO 300 GHZ) PG. 486, 2020)
- Ringing in the ears, leg cramps, balance problems, heart and eye problems, fatigue, headaches, "...nausea, vomiting, dizziness and disorientation are symptoms people experience after Smart Meter installation, as well as sleep disturbance, inability to concentrate, memory problems and mood disorders."
<https://smartmeterharm.files.wordpress.com/2012/12/1-smart-meter-problems-dec-2012-final.pdf> (page 100), <http://emfsafetynetwork.org/smart-meters/smart-meter-health-complaints/>
- Smart meters create dirty electricity through their switch mode power supply operation and this dirty electricity can create serious health problems.
- According to Doctor Samuel Milham, "Since dirty electricity is a potent carcinogen, and causes numerous health problems, the only way to avoid a public health catastrophe is to send the smart meter information over existing telephone land lines or go back to the analog meters. I'm not making light of or ignoring the RF pollution caused by the smart meters, but think the dirty electricity may be a more serious and intractable problem. (page 54)

WHAT ENERGY COMPANIES ARE CLAIMING*

THE TRUTH



Smart meters are more than 30,000 times lower than “always on” technology like your smartphone.

- According to Daniel Hirsch, retired director of the Program on Environmental and Nuclear Policy at the University of California, Santa Cruz, comparing RF radiation (RFR) exposures from a smart meter to RFR exposures from a cell phone is like comparing apples and oranges. Unless the RFR body exposure areas are standardized and the health effects of cumulative radiation (dosing) are acknowledged, then comparing smart meters to other types of RFR emitting technology will lead to grossly inaccurate conclusions. (See his video [HERE](#))
- The radiation from a smart meter is whole body exposure and involuntary, whereas RFR from a cell phone is voluntary and exposes the neck and ear (radiating a much smaller surface area of the body) when in use.
- Smart meters are pulsating with RFR from a 902 MHz and a 2.4 GHz antenna, in addition to dirty electricity within the 2 to 50 kHz range 24/7. This means there is no reprieve from the RFR and dirty electricity generated and transmitted throughout the house. Customers do not have the option of turning a smart meter off, ever.
- The FCC admitted in 2019 that some RFs can cause non-thermal adverse effects with RF frequencies ranging between 3 KHz and 10 MHz and dirty electricity generated by smart meters falls within this range. (Page 18)

Customers have the ability to opt out to a non-communicating meter.

- Dominion (and other's) "opt-out" is essentially an "opt-in" to allowing them to change out the customer's meter whenever they feel necessary, and mentions being able to disconnect power if a resident doesn't allow them to do so.
- Dominion (and other's) "opt-out" also only allows customers to opt-out to a "non-communicating" meter, which prior to 2022 meant the antennas were disabled and could easily be reset with software without the customer knowing. Calling this option a "Non-communicating" meter is misleading because the meter does communicate when it is arbitrarily reset. See [HERE](#) for Dominion Energy's information page about the non-communicating meter option.
- [Virginians for Safe Technology](#) is contacted daily by residents across the state who want to keep their electromechanical analog meter, but are being threatened to have their power cut off or their current meter forcefully changed out against their will. Power companies are demonizing customers who are attempting to protect themselves, while at the same time refusing to address any of these very important issues.
- Currently Farm structures and Businesses DO NOT have the ability to opt-out in the state of Virginia.
- Those who do Opt-out are signing an open ended contract and it is only an Interim solution which can be cancelled at anytime without notice to the customer. Legislation is urgently needed to change this, require notice if this type of work is going to be scheduled, and offer electromechanical analog and Ethernet connection meters as additional options to customers.

*Statements taken from Dominion Energy's smart meter information page (with PDF's at the bottom): <https://www.dominionenergy.com/projects-and-facilities/electric-projects/smart-meter-upgrades-va>

All underlined text above denotes hyperlinked sources



January 23, 2024

By Certified Mail and First-Class Mail, Postage Prepaid

Re: Notice of No Consent Letter

Dear _____

I am respectfully replying to your December 11, 2023 letter which is entitled “Notice of No Consent to Trespass and Surveillance, Notice of Liability and ADA Reasonable Accommodation Requirement.” Setting aside those portions which appear to come from a form letter downloadable from the Internet (and, thus, have no legal effect), I would like to address your substantive concerns about having an AMI meter at your residence.

First and foremost, it is important to note that the State Corporation Commission of Virginia (“SCC”) has granted Dominion Energy full approval to install AMI meters for all of its Virginia residential customers – including you. To the extent that you have concerns about having an AMI meter, there is an opt-out process that would allow you to get a digital, non-communicating meter. Our records indicate that you have received opt-out paperwork – as is your right – but that you have not yet signed and returned it. Unless and until you return this paperwork, you will be scheduled to get an AMI meter – and should your AMR meter otherwise need replacement in the interim, you will get an AMI meter notwithstanding your electromagnetic hypersensitivity (“EHS”) concerns.

Regarding EHS, please recognize that EHS is not a recognized medical condition – and that EHS is insufficient to support any claim (or request) for accommodations under the Americans with Disabilities Act. Respectfully, Dominion Energy has not engaged in any discriminatory conduct in relation to your alleged condition. While we appreciate that you have completed a Serious Medical Condition Certification Form, the fact remains that your stated diagnosis isn’t one that is medically recognizable – and isn’t one that entitles you to have an AMR meter at your home, or to demand that no AMI meters be located within 1,400 feet of your residence.

Again, you have a right to return the opt-out paperwork that we have sent you – and if you have concerns regarding AMI meters, we would ask that you please return that paperwork to us at your earliest convenience. Otherwise, we are unable to assist you. In short, whether you return the paperwork is up to you – again, we encourage you to return it so that we can do a meter exchange for a digital, non-communicating meter consistent with that paperwork.

Regarding your neighbors or other nearby property owners, please note that each eligible Dominion Energy customer has the right to decide for himself/herself whether to have a communicating or non-communicating meter in place – i.e., you are not authorized to decide that

January 23, 2024

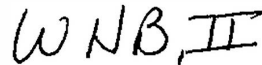
Page 2 of 2

for them. To the extent that anyone wants an opt-out meter, they can make that independent decision – and if they independently request and return the required opt-out paperwork (which you currently have), then we will honor and process those documents. While we empathize with your alleged condition, you do not have the right to demand the removal of their AMI meters – which, in any event, are not surveillance devices.

We appreciate your providing a copy of your SCC complaint letter (which also seems to be partially downloaded from the Internet). To date, we haven't been contacted by the SCC. If and when we are, we will be happy to work with the agency and its staff. And, again, if you will return the opt-out paperwork back to us, this should alleviate some or all of your stated concerns.

In conclusion, we appreciate the opportunity to respond to your letter – and encourage you to read publicly available information (including a factsheet and “Frequently Asked Questions”) on Dominion Energy’s website at <<https://www.dominionenergy.com/smartmeters>>. These resources can help educate you about the facts (and myths) of AMI meters. Should you have any continued concerns, please contact our Customer Solutions Center at 1-800-DOM-HELP (1-800-366-4357) for assistance – and, again, please feel free to send in your opt-out paperwork as soon as you can.

Sincerely,

Handwritten signature in black ink, appearing to read "WNB, II".

William H. Baxter II
Assistant General Counsel

cc: Customer Relations & Policy

----- Forwarded Message -----

From: dcaswual@aol.com dcaswual@aol.com

To: electric.customer.relations@dominionenergy.com electric.customer.relations@dominionenergy.com

Sent: Friday, February 16, 2024 at 09:56:21 AM EST

Subject: Attn: Ms Holly Johnson Fw: Follow Up

Hello Ms. Johnson,

It has now been more than 60 days since we began communicating about the radiation being emitted from my opt out meter – including readings of over 2,000 μ Watts per meter ². On December 6th, Robert Stone requested I send him the video that showed the opt-out meter's radiation readings and the related written report. I sent him the video and report the same day, December 6, 2023.

While you have responded to some of my questions about this meter and assisted me in replacing the meter after I contacted you about the condensation inside my meter, my most important issue remains unresolved: why is my opt-out meter emitting high levels of radiation?

I have tested the replacement opt-out meter that was installed on January 18, 2024 and it also is emitting radiation at unsafe levels. I tested this replacement meter using the Safe & Sound Pro II broadband RF meter, the same meter used by my engineering consultant. Testing showed the replacement meter is also transmitting in the high range of RF over 2,000 μ Watts per meter ². This is a level dangerous to human health and is unacceptable.

I am again asking that a representative from Dominion schedule an appointment to come to my home and test my meter using its equipment that measures RF μ Watts per meter ² while I am present. I am also requesting a written report of the test results showing the RF levels being transmitted by the meter and all other findings from the test. This testing must be done at a mutually acceptable so I am can be present during the testing and so that I can turn off the house power to ensure an accurate reading of the meter.

In regards to the meter's internal water and corrosion issue inside the meter box, on January 26th I requested a service call to have a technician open up the meter box and check for more condensation and corrosive material because the previous technician did a poor job of cleaning on January 18th. A technician arrived at my home within hours and opened the box and removed the AMI meter. We found new, heavy corrosion that had dripped onto the floor of the meter box and also, clinging to the metal parts and wires. The technician said the corrosive material was accumulating inside the meter and box due to some holes he found in the large gray cable that runs from meter box to the roof. He said the main cable needs to be replaced right away and he filed a work order. He told me that I would be contacted by Dominion to set up a date to have the work done. It has been almost a month and I have yet to be contacted. The meter installed on January 18th now has moisture accumulating inside the glass cover, creating another fire hazard.

Please have someone contact me immediately to set up an appointment to have the radiation reading testing done and for the installation of new cables. I believe I am at risk from both the radiation being emitted from my meter and that my home is at risk of catching on fire due to moisture in the meter box, on the meter and faulty wiring.

Thank you,

Jill King

----- Forwarded Message -----

From: Electric.Customer.Relations@dominionenergy.com
<electric.customer.relations@dominionenergy.com>
To: dcaswual@aol.com <dcaswual@aol.com>
Sent: Friday, January 12, 2024 at 05:11:55 PM EST
Subject: RE: Follow Up

Good afternoon Ms. King,

Thank you for your email.

A small amount of condensation in a meter is not necessarily unusual because these meters are not designed to be 100% water tight. In addition, there is a small outlet on the bottom of the meter cover to allow for water droplets to exit the meter. However, in reviewing the picture of the meter that is on your home, it appears that the meter cover may be compromised. Therefore, we will arrange for the meter to be exchanged with another non-communicating meter that also doesn't have a NIC card.

Regarding the circular silver metal piece on the meter located on your home, this is an outlet which allows a Meter Servicer to probe the meter to obtain data. This outlet is also used to conduct a field test on the meter. The reason the outlet is absent in the pictures I provided you is because we removed the meter cover so you could more easily see the absence of the Network Interface Card (NIC) in the optout digital meter, and the outlet or circular silver medal piece is part of the meter cover, not the meter.

Regarding your question about a Zigbee transmission chip, the meter that is installed on your home does not have a Zigbee transmission chip. A Zigbee transmission chip is typically used for appliances and/or devices in a smart home to communicate. In addition, a Zigbee chip typically would not be used independent of a NIC card, and your opt-out digital meter does not have a NIC card.

Regarding your question on how your usage is determined each month since the opt-out meter was installed, please see below:

September bill; Actual reading on September 15
October bill; Estimated reading on October 25
November bill; Actual reading on November 28
December bill; Actual reading on December 27

In addition, estimated read follow the below rules in sequence:

1. Previous year same month consumption - If not available,
2. Previous months consumption history - if sufficient history is not available,
3. Average consumption maintained per customer

Regards,
H. Johnson

From: dcaswual@aol.com <dcaswual@aol.com>
Sent: Monday, January 8, 2024 7:33 PM
To: Electric Customer Relations <Electric.Customer.Relations@dominionenergy.com>
Subject: [EXTERNAL] Fw: Follow Up

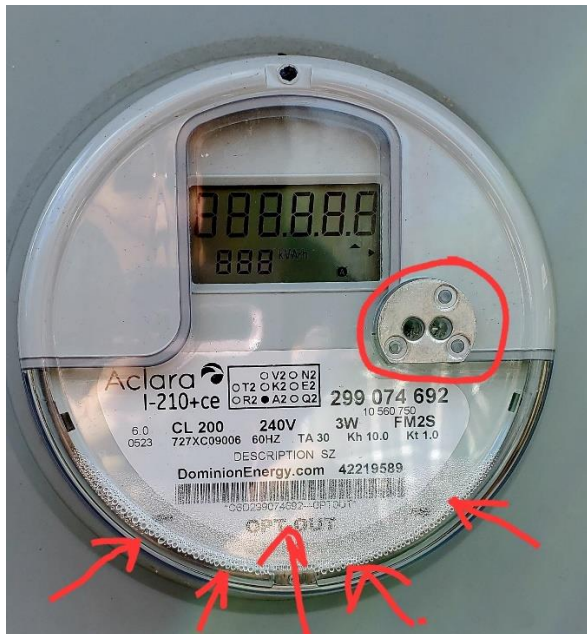
CAUTION! This message was NOT SENT from DOMINION ENERGY

Are you expecting this message to your DE email? Suspicious? Use PhishAlarm to report the message. Open a browser and type in the name of the trusted website instead of clicking on links. **DO NOT** click links or open attachments until you verify with the sender using a known-good phone number. Never provide your DE password.

Hello Mrs. Johnson,

I am writing in response to your letter dated January 4, 2023 and the comparative photos of Dominion's opt out meters. However, before I discuss your letter, I must bring to your attention a safety concern that I just discovered with the meter. Please see the picture below of my meter as it looked today. The inside of the meter cover has a substantial accumulation of rainwater droplets in the lower 1/3 portion of the cover. Evidently, there must be a broken seal somewhere that allowed rainwater to enter and settle the inside of the cover. There is a 100% chance of rain tomorrow, Tuesday, and I am very concerned that more rainwater will seep into the meter cover.

When water accumulates inside the meter cover like this, is it considered a potential fire and safety hazard? If it is, please contact me immediately so we can arrange a change out meter.



With regard to the comparison photos you sent (see below), the only visual difference I see in the photo is that my opt out meter has a 1 inch, silver, circular metal piece positioned on the outside of the glass cover and the Dominion opt out meter doesn't have that piece. (see above photo) What is this part called and what is its purpose and function?

It was suggested to me by the engineering consultant I hired and that measured high levels of RF radiation exposures coming from my opt out meter, that my meter could have a Zigbee transmitting chip in it. Would you please find out if my meter has a Zigbee or any other chip in it and if it does, please have it scheduled for removed by appointment.

Assuming my meter does not have a network interface card (NIC) which you explained to me when we spoke on January 4, 2024, you have given me to understand that with no NIC card in the opt out meter, the meter is disabled and not capable of transmitting or sending communication to Dominion or any other source. In the link below, the video report by my engineering consultant appears to show the meter is not only transmitting and sending high levels of RF frequency. There were also found unacceptably high levels of dirty energy (DE) on the lines in my house. It was only after I purchased and installed \$2,000 DNA line filters that the high levels of DE were mitigated inside the house. How is it possible that an opt out meter with no NIC card can cause these kinds of high RF and DE readings? https://drive.google.com/file/d/1UwZbfzaGkBnCXvHrZoAnS80htfy9unpe/view?usp=drive_link [drive.google.com]

I would like to bring to your attention that my repeated requests concerning how my opt out meter has been read every month since the meter was installed in September 2023 continue to go unanswered. I would very much appreciate your providing me with the details about how my meter usage has been determined since last September when my opt out meter was installed. If any of the readings were estimated, what is the criteria used to determine how much electricity I used and billed for?

Thank you,

Jill King

The Inside Outside Guys: The lowdown on dirty electricity (DE)

<https://www.detroitnews.com/story/life/home-garden/2022/01/27/inside-outside-guys-lowdown-dirty-electricity/9201071002/> [detroitnews.com]

----- Forwarded Message -----

From: Electric.Customer.Relations@dominionenergy.com
<electric.customer.relations@dominionenergy.com>
To: dcaswual@aol.com <dcaswual@aol.com>
Sent: Thursday, January 4, 2024 at 04:40:33 PM EST
Subject: RE: Follow Up

Ms. King-

I hope this email finds you well.

As promised, I have attached a series of photographs that display the physical differences between the digital non-communication meter and the AMI communication meter. You have an opt-out non-communicating meter installed on your home which is represented on the left side of the photo. I believe these visuals will help in further understanding the features of the non-communication meter.

Please take your time to review the attached photos at your convenience. Once you have had the opportunity to do so, I would like to schedule a follow-up discussion to delve deeper into this topic. I understand your time is valuable, so please let me know a suitable time on Monday when I can contact you.

I look forward to further exploring this subject with you and finding potential solutions that align with our shared goals.

Best regards,

H. Johnson

Manager, Customer Relations & Policy

From: Electric Customer Relations
Sent: Friday, December 22, 2023 12:50 PM
To: 'dcaswual@aol.com' <dcaswual@aol.com>
Subject: Follow Up

Ms. King-

Thank you for taking the time to speak with me on the phone earlier today. I truly appreciate your willingness to share your concerns.

As discussed on that call, we will have a dedicated contact to reach out to you on January 2nd to schedule an appointment at your convenience. It is our goal to thoroughly address your concerns and provide you a formal response.

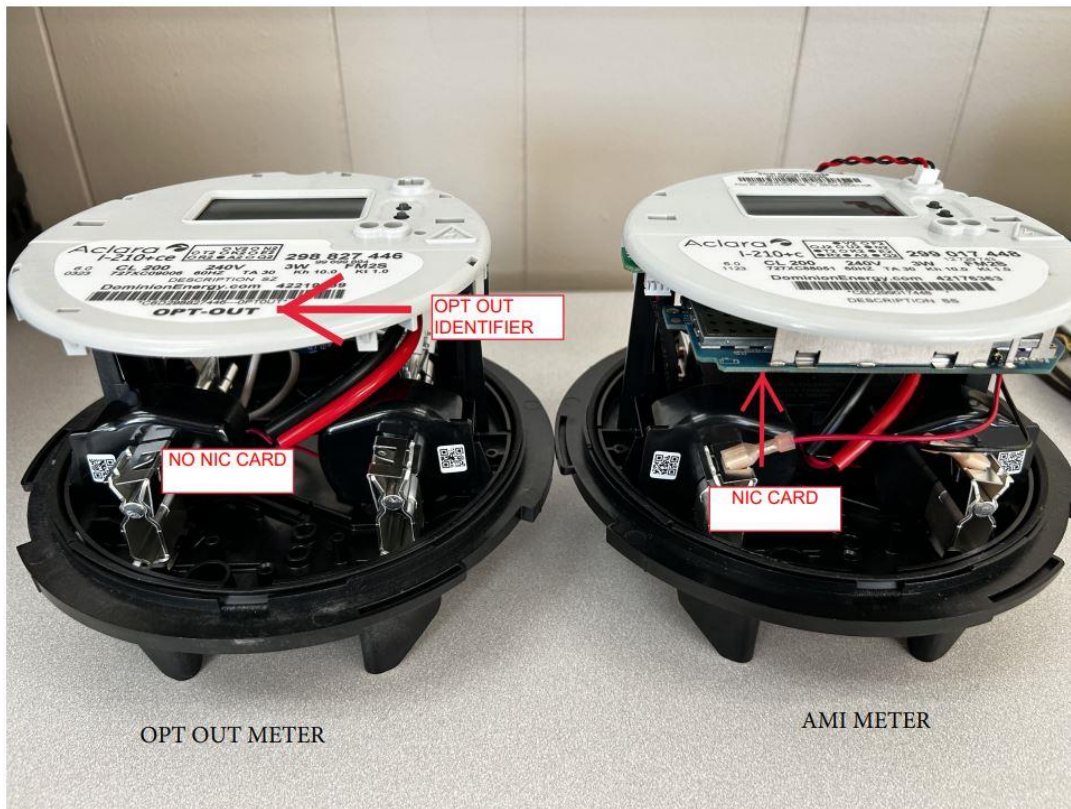
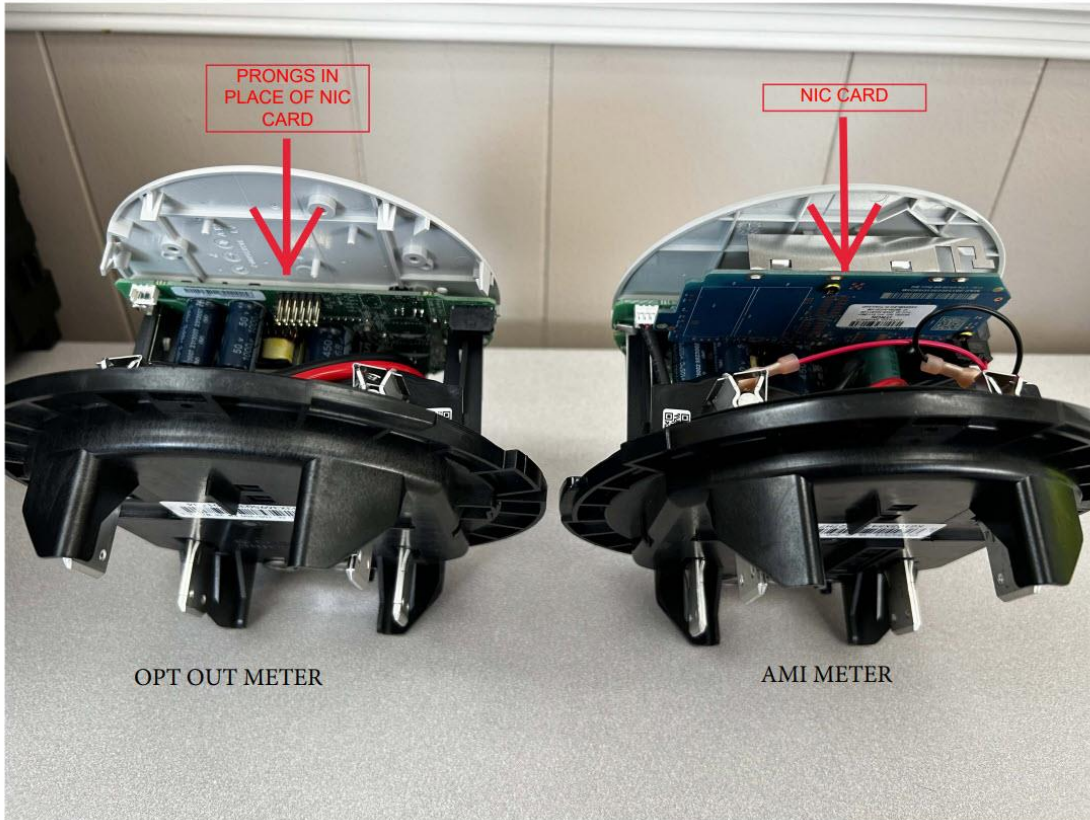
If you have any further questions or require immediate assistance, please do not hesitate to reach out to me directly at this email address or by calling 804-212-8545.

Best Regards.

H. Johnson

Manager, Customer Relations & Policy

CONFIDENTIALITY NOTICE: This electronic message contains information which may be legally confidential and or privileged and does not in any case represent a firm ENERGY COMMODITY bid or offer relating thereto which binds the sender without an additional express written confirmation to that effect. The information is intended solely for the individual or entity named above and access by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution, or use of the contents of this information is prohibited and may be unlawful. If you have received this electronic transmission in error, please reply immediately to the sender that you have received the message in error, and delete it. Thank you.



----- Forwarded Message -----

From: dcaswual@aol.com <dcaswual@aol.com>

To: Customer.Relations@dominionenergy.com <customer.relations@dominionenergy.com>

Sent: Friday, December 15, 2023 at 02:53:39 PM EST

Subject: Fw: Re: To: ROBERT STONE

December 15, 2023

Hello Mr. Stone,

Thank you for acknowledging receipt of my December 6, 2023 email and the video footage of my opt out meter communicating. Unfortunately, the response did not address any of the issues we discussed and therefore I am reiterating my questions again below.

It was my assumption that the footage I sent you would be reviewed and you would contact me to follow up. Please confirm you have reviewed the footage and let me know when Dominion intends to come and replace my meter with a non-communicating meter. I would like this to occur through a scheduled appointment. Please contact me directly by phone so this appointment can be scheduled.

Another issue we discussed, was the reading of my meter. You had stated that the meter was read on November 28th. As I mentioned, I have a security camera with a clear line of sight to the meter. If a Dominion Energy meter reader had come up my driveway to read the meter, the security camera would have been triggered and recorded it. I have reviewed the footage and there is no recording of anyone at the meter on that day. Based on our conversation, I was expecting a follow up communication confirming the date my meter was read. Please confirm the exact date and time and the method by which my meter was read in November.

In addition, I would also like to know the other dates my opt out meter has been read after September 15th and the methods of how the meter was read. Please confirm if the readings have occurred through in person readings or were based on estimated usage.

The courtesy of a prompt reply to this letter would be appreciated.

Thank you,

Jill King

From: Electric.Customer.Relations@dominionenergy.com
<electric.customer.relations@dominionenergy.com>

To: dcaswual@aol.com <dcaswual@aol.com>

Sent: Friday, December 8, 2023 at 05:19:44 PM EST

Subject: RE: Re: To: ROBERT STONE

Good Afternoon Ms. King,

Yes, to confirm we have received your email, along with the attachment. Thank you for sending it so promptly and for the opportunity to address your concerns.

If you have any additional questions or concerns pertaining to this email they can be directed to Electric.Customer.Relations@dominionenergy.com or you may call 1-800-938-2118, Monday – Friday 8 AM – 5PM.

Sincerely,

Customer Relations & Policy
Dominion Energy Virginia
Dominion Energy North Carolina

From: dcaswual@aol.com <dcaswual@aol.com>

Sent: Friday, December 8, 2023 12:22 PM

To: Electric Customer Relations <Electric.Customer.Relations@dominionenergy.com>

Subject: [EXTERNAL] Re: To: ROBERT STONE

Hello Mr. Stone,

I am writing to ask if you received my email below?

Thank you,

Jill King

From: dcaswual@aol.com <dcaswual@aol.com>

To: electric.customer.relations@dominionenergy.com <electric.customer.relations@dominionenergy.com>

Sent: Wednesday, December 6, 2023 at 11:16:30 AM EST

Subject: To: ROBERT STONE

Hello Mr. Stone,

Attached is a report of the opt-out meter installed, which was installed on my home located at 9914 Broadview Drive, Fairfax, VA 22030 on September 15, 2023. The report contains a link to the video taken of the opt-out meter at the time it was being tested. The testing was performed by Bill Bathgate, President DE Filters LLC, on November 10, 2023. Note that testing was done with the house power on and also, the video confirms all power to the house was then turned off and tested. Please review the footage and provide me with an assessment of the review as soon as possible.

In follow-up on our phone conversation on Monday, December 1, 2023, were you able to determine whether my November 28 meter reading was done in person or is based on an estimate? If so, please provide me with that information.

As I mentioned, I have a front door security camera with a clear line of sight to the meter. If a Dominion Energy meter reader had walked up my driveway to read the meter, the security camera would have been triggered and recorded it. I have reviewed the footage and there is no recording of anyone at the meter on that day.

Would you please provide me with the additional dates my meter was read after September 15th and the method of how the meter was read (e.g. In-person or estimated usage)?

Also, when usage is estimated, what is the process used is to determine the amount of electricity used and how is any overage in the estimate counter-balanced on the next reading and bill?

Please acknowledge your receipt of this letter and when I can reasonably expect to receive answers to my questions in writing.

Thank you,

Jill King

Testing of Jill King opt Out meter

By William S Bathgate from DE Filters LLC

Report on Jill King opt Out meter testing 11/20/2023

Here is the video of the test conducted on a meter that as an opt Out meter should not be emitting and Radio Frequency emissions at all.

https://drive.google.com/file/d/1UwZbfzaGkBnCXvHrZoAnS80htfy9unpe/view?usp=drive_link

This test was done without the presence of any RF emitting devices present (such as cell phones) and power fully off at the house. So, there was no local WIFI at the residence active. The only device emitting any RF is the Dominion opt Out meter. This customer is paying for a meter that is not supposed to radiate RF at all, yet as you can see in the video it actually is radiating. At times it is radiating over 2,000 μ Watts per meter ²

In building biology standards, the safe RF level is 10 μ Watts per meter ²

Recommended EMF Levels

		No Concern	Slight Concern	Severe Concern	Extreme Concern
1	AC Magnetic Fields				
	Flux Density in milligauss mG	< 0.2	0.2 - 1	1-5	> 5
2	RF Radiofrequency Radiation				
	Power Density in microwatt per square meter μW/m²	< 0.1	0.1 - 10	10-1000	> 1000
3*	Dirty Electricity				
	Graham / Stetzer GS Units FCC Class B Specs of 250 μ V Max	< 30 <250	30 – 50 250-500	51-400 600-800	> 400 >800
4	AC Electric Fields				
	Field Strength potential-free in volt per meter V/m	< 0.3	0.3-1.5	1.5-10	> 10

*Dirty Electricity Guidelines do not yet exist in official Building Biology standards, as the

Sincerely,

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Non-Communicating Configuration for Residential Metering:

E331 FOCUS® AXe/AXRe

E351 FOCUS® AXe/AXRe-SD

The Focus® AX metering platform provides advanced digital metering for the expanded grid and consumer needs of utilities. The modular design allows it to be deployed with or without communications. This information sheet clarifies the identification and capabilities of Focus® AX meters that are configured without communications.

Label Identifies Communication Capabilities

All meters with communications modules (RF radios, cellular, etc.) have a label above the digital display. Meters without a communications module have either no label or a label clarifying there is no communication capability (i.e. a label stating "No Radio" placed on the meter).

Capabilities of Non-Communicating Meters

While the FOCUS® AX meters are designed with an expanded set of capabilities, certain features depend on remote communications function. For meters deployed without communications (e.g. no radios), the following features will not be available:

- Tamper detection
- Pre-payment and flexible billing options
- Remote meter connect/disconnect
- Over-the-air meter programming
- Other AMI (Advanced Metering Infrastructure) functionality

The value of the Focus® AX metering platform remains strong for utilities and consumer, even without communicating capabilities, including high-quality energy measurement and reliable performance.

For more information on Landis+Gyr solutions, please visit LandisGyr.com.