

Subject: ***Opposition statement*** to D.P.U. 20-69 Against Department of Public Utilities Modernization of Electric Grid – Phase II

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This is a statement and explanation of opposition to the smart meter and time of use billing pilot for EV and any other customers.

First, the Department of Utilities is being negligent by failing to address the harm represented by non-ionizing electromagnetic radiation. Despite acknowledging potential sensitivities and disability from electromagnetic exposures in D.P.U. Order 12-76-B, the department has failed to take serious and cautious steps to limit electromagnetic exposures or engage in a sincere investigation and discussion with experts who warn our current exposures are harmful. Instead, the Department of Utilities previously engaged Peter Valberg, who has an incredible, terrible [reputation](#) as an industry hack and has questionable credentials.

Secondly, the harm caused by installation of smart meters is a violation of human rights. Smart meters are a [health hazard](#) due to [wireless radiation](#) and due to components which increase “[dirty electricity](#),” otherwise known as harmonics and transients.

Thirdly, to provide evidence of harm for your review, incorporated by reference are the following materials for your education: the Bioinitiative Report ([bioinitiative.org](#)), which reviews a slew of research including oxidative, autoimmune, cancer, and other biological findings from exposure; Dr. Joel Moskowitz’s reviews and listings of current research available at [SaferEMR.com](#); Dr. Sam Milham’s text *Dirty Electricity* and his publications at his personal website; Dr. Martin Blank’s book *Overpowered*; Dr. Robert Becker’s books *The Body Electric* and *Cross Currents: The Perils of Electropollution*; The International EMF Scientist Appeal ([emfscientist.org](#)); The EMF Call ([emfcall.org](#)); *Cell Towers-Wireless Convenience? or Environmental Hazard?* edited by Blake Levitt; *Electronic Silent Spring: Facing the Dangers and Creating Safe Limits* by Katie Singer; previous submissions from D.P.U. docket [12-76](#) and 18-28; and peer-reviewed journal articles available at the EMF-Portal or at Pubmed by Dr. Devra Lee Davis, Dr. Martin Pall, Dr. Anthony B. Miller, Dr. Ronald N. Kostoff, Dr. Cindy L. Russell, Dr. Paul Heroux, Dr. Alfonso Balmori, Dr. Igor Y. Belyaev, Dr. Dominique Belpomme, and Dr. Lennart Hardell.

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. Even if an individual is allowed to opt out, a smart meter may exist in a friend’s home, beside a sidewalk, or in other locations visited by the individual, leading not only to increased ambient exposures but times of intense exposures and a reduction of zones comparatively free of electromagnetic radiation. EV charging stations can also be expected to be located in shared, public locations. The Department of Utilities has a responsibility to prevent harmful exposures to consumers despite, or because of, ignorance.

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. Smart meter infrastructure [sabotages](#) the primary consideration for purchase of electric cars, because wireless and digital infrastructure is energy and resource intensive. Offering an EV economic incentive is largely a waste, as many EV owners are predisposed to adopting behaviors thought to be sustainable. EV owners are likely secure financially, so that providing a subsidized economic incentive is doubly unfair to ratepayers who cannot afford an EV or any vehicle. Property value can also be [reduced](#) by the installation of new cellular infrastructure, as occurred in the Massachusetts Worcester smart meter pilot, and this loss of property value is also unfair.

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. This seems to be poorly conceived: when charging an electric vehicle takes 12 hours, isn't charging going to happen regardless of peak or off-peak hours? Why would anyone drain an EV battery and thus lose time and money returning paid-for-energy to the grid for a reduced price?

In closing, the consumer benefits are questionable and any benefits far outweighed by harm to health.

All letter references, including via links, are hereby incorporated by reference.