

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of)	
DTE ELECTRIC COMPANY)	Case No. U-17767
for authority to increase its rates, amend)	
its rate schedule and rules governing the)	
distribution and supply of electric energy, and)	
for miscellaneous accounting authority.)	
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INITIAL BRIEF

OF

RICHARD MELTZER

I. INTRODUCTION AND SUMMARY OF POSITION

A. Introduction

This Brief is filed on behalf of Richard Meltzer, an Intervenor and customer of The DTE Electric Company (hereafter referred to as “DTE”), who is representing himself.

This Brief is submitted in accordance with the schedule established by Administrative Law Judge Sharon Feldman for Michigan Public Service Commission (MPSC) case U-17767. Failure to address any issues or positions raised by other parties should not be taken as agreement with those issues or positions.

DTE brought the current rate case U-17767 to the Michigan Public Service Commission seeking wide-ranging rate increases for most of its services. Included for consideration in its application is a request to the Commission to approve continued customer funding of the AMI “smart meter” program.

The AMI smart meter, also known as an “advanced” meter, is the new wireless transmitting and data collection device that eliminates the need for a manual meter reading and provides new features such as remote power turn-off and turn-on. Smart meters have been actively deployed in DTE’s service territory and will continue to be installed until all customer sites have been transitioned to this technology.

This case follows MPSC case U-17000 that directed DTE to offer an opt-out program and assess alternative technologies that could be utilized for the same purpose as the AMI electrical meter. It also follows U-17053 that established the rate schedule for those customers who choose to enroll in the “opt-out” program. Opting-out necessitates the

recurring monthly need for a manual meter reading as well as an initial site visit by a technician to disable the radio transmitter within the smart meter.

B. Summary of Position

1. Customers choosing to opt-out of the AMI smart meter program should be permitted to retain their current, fully functional analog meter since an AMI meter with its transmitter disabled offers no benefit over the traditional analog meter.
2. Power shut-off should not be permitted for any customer whose payment record is up to date. Threat of power shut-off should not be allowed as a tactic to intimidate customers to take a smart meter.
3. There is a sufficiently large body of medical and biological research to invoke the Precautionary Principle justifying customers rejecting installation of an AMI smart meter.
4. DTE has made little effort to provide the public the full breadth of information pertaining to smart meters and the opt-out program.
5. The number of opt out customers is constrained by lack of information and communication that impacts various costs and forecasts.
6. Opt-out customers should be permitted to self-report their meter readings, subject to audit, in lieu of a reading being taken by a DTE employee or contractor. This would negate the meter reading expense.

7. Customers who opt-out but are living in apartment and condominium complexes where dozens of meters are clustered together will not receive from DTE the benefit for which they are being charged. This is particularly true for residents who have medical conditions, including radio frequency (RF) sensitivity, that motivate their opting-out.

REQUEST TO TAKE NOTE

It is requested that the ALJ and other interested parties take note of a very recent Court of Appeals decision regarding Motion for Reconsideration filed by the MPSC on the Consumers Energy case known as Rison et al. (Docket No. 317434; 317456, LC No. 00-017087).

Judge O'Connell filed a dissenting opinion. It is his view that the scope of the earlier order should be expanded to specifically include health and privacy issues and their impact on costs. He also questioned the fairness of charging opt-out fees. The request is made to consider his opinion and its application to U-17767 (see http://publicdocs.courts.mi.gov:81/coa/public/orders/2015/317456%2868%29_317434order.pdf).

II. ARGUMENT

A. Retention of Current Analog Meter

DTE's insistence on removing a fully functioning analog meter for opt-out customers and replacing it with an AMI digital smart meter that has its radio transmitter turned off, should be rejected as needless. Both the older technology analog meter and the new AMI meter with its transmitter disabled require a direct, on-site meter reading. Allowing a customer to retain their current analog meter saves the expense of the new meter as well as the labor cost to install the AMI meter and then turn off the transmitter. There is no distinction between an AMI wireless smart meter with its transmitter disabled and an analog meter, so testified Mr. Sitkauskus (5 T 750-751, 833). Consequently there is no benefit attributable to a transmitter disabled AMI meter.

When asked “to compare, given the transmitter off, are there any other things the smart meter can do that the legacy meter cannot do?” To this Mr. Sitkauskus answered, “For my purposes of gathering information, no.” (5 T 751)

B. Customer Satisfaction

Customer satisfaction is an attribute that nearly all businesses say they value and strive to achieve. Organizations that place a premium on customer service and customer satisfaction are sometimes called “customer centric.” Most companies have mechanisms to gauge that satisfaction and track it over time to determine its ongoing status. There is a general understanding that high levels of customer satisfaction are good for business. Conversely, low levels are correlated with poor business performance or are a harbinger of an imminent decline. This is especially true in a competitive market place.

DTE believes itself to be a “customer centric” organization. When asked about this Mr. Sitkauskus said, “Yes, I do believe we are customer centric.” That was followed with the question, “You put the customer at the center of all your considerations?” His response was “A customer’s position or stance is always looked at before making decisions, yes, sir” (5 T 757).

Similarly, Mr. Stanczak of DTE testified, “Well, certainly I believe we’re very focused on customer service and customer satisfaction” (4 T 191). He further elaborated, “The Company believes that providing our customers with quality customer service entails accurately billing our customers, ensuring our customers have ready access to a qualified customer service representative, and responding to customer inquiries and service orders in an efficient and effective manner” (4 T 190-191)

Despite this declared emphasis on the customer, a recently commissioned survey measured a 77% satisfaction rating for DTE (4 T 192). This rating would likely be cause for concern in a competitive market place but DTE is a monopoly albeit a regulated one. Perhaps it is not surprising to find that Mr. Stanczak, a financial analyst, had not studied the relationship between customer satisfaction and profitability. Nor had he any awareness of such studies within DTE (4 T 193).

The marginal satisfaction rating of 77% may be due, in part, to the rather perfunctory view of customer satisfaction taken by DTE. The emphasis is on accurate billing, timely responses to inquiries and service requests, etc; all important functions, surely. But nowhere in testimony does a DTE representative articulate an approach to its customers that solicits their desires and preferences, their likes and dislikes.

In December, 2014 the House Oversight Committee, chaired by Rep. Tom McMillin, called a meeting specifically to allow customers who had complaints about installed smart meters to testify before them. It is estimated that more than 200 people interrupted their schedules and traveled to Lansing to do so. Though DTE trivialized this number (5 T 758) this represents a significant number of citizens taking action.

Mr. Sitkauskus was at that meeting to provide the legislators a status update regarding the AMI program. At the U-17767 hearing he was asked, "You said you listened to some of the testimony of citizens at that [House Oversight] meeting; is that correct?"

He responded, "Correct."

That was followed with the question, “And when you heard their testimony you apparently did not respond in any way to engage them; is that correct?”

His response, “I was not even -- that is correct (5 T 759).

Here was a perfect opportunity to gain the “Voice of the Customer” but it was lost, or perhaps more accurately put, discarded. Perhaps Mr. Sitkauskus recognized that the “Voice” did not conform to the DTE plan.

Rather than being customer centric where every customer’s voice is valued and every effort is made to exceed their expectations, DTE has fashioned a one-size fits all solution and expects customers to conform to their dictates.

So, rather than accommodate the wishes of customers who choose to retain their fully functional analog, legacy meter DTE denies them that option with the explanation that “The analog meters. . .are essentially out of production by the major manufacturers” (5 T 753, 755). Of course, “out of production” does not explain the necessity of replacing the functioning meter immediately. And what of the many, many functional legacy meters that have been removed? They could even be reused to replace an onsite analog meter, if and when, it fails.

The only other explanation offered for insisting on customer acceptance of a smart meter is based on standardization (5 T 834,842). Of course, currently both types of meters coexist without compatibility conflict within DTE’s service territory.

There is an apparent contradiction. It is hard to reconcile claims of being a customer centric organization with policies that shut off a customer's power for the mere desire to retain a fully functional analog meter deemed by DTE to be equivalent to an opt-out smart meter that has the radio transmitter turned off.

Mr. Sitkauskus acknowledged DTE's policy by answering "Yes" to the following question.

"Is it the policy of your company that those people who are still refusing an AML meter, that they must either acquiesce and accept the meter or they will have their power turned off? (5 T 842)

C. Role of the Michigan Public Service Commission (MPSC)

It was DTE's decision to move forward with the AML program. It was solely their decision to implement smart meters as a replacement technology. The MPSC has taken the position that these decisions are DTE management's prerogative (5 T 755, 842, 844). It is also the case that no legislation required implementation of smart meter technology nor provided a mandate to do so (5 T 845).

However, the MPSC has allowed the cost recovery of the AML meters in DTE's rate cases (5 T 844). This provides an implicit approval of the program by the MPSC at least to the extent that no objection was taken. The MPSC believes its explicit role is to only determine if expenses are prudent and reasonable (5 T 755).

It is uncertain why the MPSC functions in such a constrained manner. MPSC is deemed to be a watchdog agency. From its own website, "The mission of the Michigan Public Service Commission is to grow Michigan's economy and enhance the quality of life of its

communities by assuring safe and reliable energy, telecommunications, and transportation services at reasonable rates. It also has as a goal, “to provide customers with the opportunity to choose alternative [service] providers.”

Docket U-17000 served as the initial basis for consideration of the AMI program by interested parties who chose to comment on various aspects of AMI including, but not limited to, health, safety, data privacy, meter opt-out options and costs (8 T 2140). This docket was opened, in part, due to nine municipal resolutions expressing concern with the new smart meter technology (8 T 2171).

As part of that case a paper entitled “Report on the Impact of Radio Frequency Emissions From Smart Meters (The Report) was issued (8-3-2011). However, this report was not a formal study but as Mr. Hudson, manager of the smart grid section, said, “I would deem that study as more of a literature review (8 T 2171).

However, none of the MPSC staff that created that paper have either a medical or health sciences background (8 T 2172-2173). And though MPSC staff consulted with the Lawrence Berkeley National Laboratory, that lab conducts research on behalf of the U.S. Department of Energy, the sponsors of the smart grid and it therefore is not a neutral, independent agency.

Given the vast body of literature regarding the biological effects of radio frequency (RF) emissions the Report was conspicuous in its limited citations. And it does not cite a single study that proves continuous exposure to even low-level RF is safe, especially for children. Some of the most critical and independent evaluations of the effects of RF were not considered. Moreover, many of the concerns registered by knowledgeable citizens in the U-17000 docket were not addressed.

But the Report concluded that health effects from smart meters were inconsequential (8 T 2171-2172). Regarding health and safety considerations, the Commission noted on page 3 in reference to Staff's report that "the appropriate federal health and safety regulations provide assurance that smart meters represent a safe technology." (8 T 240)

The governing federal agency that determines safe levels of RF exposure for humans is the Federal Communications Commission (FCC). Dr. David Carpenter, M.D. an eminent public health physician brought to U-17767 as an expert witness was asked, "Do you have reason to believe that the FCC standards referenced by these other studies is in any way inadequate for health concerns?"

His response, "Yes, I consider them to be grossly inadequate (10 T 2521).

U-17000 was uncontested, created no evidence, did not allow for witnesses and cross examination. It is questioned why this modest piece of work is now used as the justification for the deployment of the AMI program nor why a contested case was not pursued.

Concluding U-17000 the Commission ordered regulated electrical utilities to submit various information including an indication whether the electric utility intended to allow customers to opt out of having a smart meter. This was in response to the request from municipalities for a smart meter opt-out option.

As stated by Mr. Hudson the order provided “an additional consideration to customers who were not comfortable with an AMI meter, in U-17000 the Commission directed the Company to offer an opt-out option to those customers” (8 T 2145).

But DTE’s opt-out program still requires customers to accept the AMI smart meter fully intact. Then later a technician is dispatched to turn off the transmitter. But the end result is the customer is still left with a digital smart meter – still emitting spurious electrical transients across the house wiring – what some call “dirty electricity” (10 T 2502) and are still capable of collecting detailed personal usage data.

This is not what most of those choosing to opt-out want. Those who suffer with hyper electro-sensitivity complain about the smart meter even when the transmitter is off since spurious transients are still emitted (10 T 2501-2502).

This is not customer centric.

D. Medical and Health Research

The U-17000 Report presented a benign view of smart meters concluding there was no need for concern regarding health matters. (The alleged shortcomings of the Report have been noted elsewhere in this Brief.)

David O. Carpenter, M.D., a noted public health physician and researcher with a specialization in environmental health and disease prevention, testified as an expert witness in the current rate case, U-17767. Dr. Carpenter is Director of the Institute for Health and the Environment at the State University of New York, Albany which is a Collaborating Centre of the World Health Organization.

Dr. Carpenter's testimony offers a different view. He is concerned with the health costs imposed on customers in consequence of the radio transmitters in smart meters and also in consequence of the power quality issues, sometimes called "dirty electricity" generated by the power supplies used in these meters (10 T 2499).

He details those costs as "Diminished health for a minority of the population, probable diminished life expectancy for the majority, probable genetic damage and all the unnecessary out of pocket medical costs people will incur in order to cope with the harm" (10 T 299).

And when asked about the ongoing installation of AMI smart meters he said, "Widespread deployment cannot be justified at this time based on the peer-reviewed research we have. [This] amounts to ... an experiment without the consent of the experimental subjects" (10 T 2499).

Exhibit DS-1 is a statement endorsed by forty five medical professionals and scientists, who together have authored hundreds of peer-reviewed articles on the effects of electromagnetic radiation. They corroborate Dr. Carpenter's position regarding the effects of low level radio frequency and microwave radiation in general and smart meter radiation in particular.

Contrary to The Report of U-17000 Dr. Carpenter says, "There is a strong body of evidence that demonstrates a variety of adverse human health effects, including cancer and effects on brain and behavior, coming from exposure to radio frequency radiation like that generated by wireless smart meters" (10 T 2500).

Dr. Carpenter testified that approximately 5%-10% of the population is “electro-sensitive”, i.e. people who experience more or less immediate symptoms when exposed to electromagnetic radiation; symptoms that include headaches, mental confusion, rapid heartbeat (10 T 2500-2501).

And when asked, “Is it possible that the kind of electromagnetic fields that cause electro-sensitive people to experience immediate symptoms of distress, are also the kind of fields that are likely to cause long term illness to a much larger group of individuals who do not experience immediate symptoms?”

Dr. Carpenter’s response was, “Yes, this is not only possible but likely (10 T 2501)

Concerning the matter of DTE’s opt-out program wherein a smart meter is installed but the radio transmitter is then turn off. Dr. Carpenter testified regarding the “switched mode power supply” contained in digital smart meters. “There have been many reports ... that these power supplies are causing low frequencies in the kilohertz range to travel through the wiring of a home or business. This phenomenon is ... frequently called the “dirty electricity” problem. There have been many reports that this phenomenon produces adverse health effects similar to those produced by the radio frequency transmitters” (10 T 2502).

Exhibit 2 (DS-2) includes considerable research material. Dr. Carpenter was asked about page 3, item 11, where he indicated that some health effects are shown at several hundred thousand times below the FCC public exposure guidelines.

He cited the BioInitiative Report which contains references to some 5,000 studies that include both human and animal studies of biological effects induced by exposure to electromagnetic fields at intensities that are below the FCC guidelines and intensities that do not cause measurable tissue heating.

There are also many other references in Exhibit 2 that describe cellular, DNA, immune system, blood brain barrier, enzyme production, among other effects from low level electromagnetic fields.

In the context of all this biomedical evidence Dr. Carpenter explained the Precautionary Principle which states that when you have strong evidence but not full proof for an association between some event and some disease, then steps should be taken to reduce exposure without waiting to dot every I and cross every T (10 T 2542).

It should be noted that smart meters emit RF much more often than to transmit the data of customer electrical usage. Meters are configured in a MESH network or web and constantly “talk” to one another. These other meter transmissions involve ongoing network synchronization, meter status check, software updates, among other purposes.

Mr. Sitkauskus, DTE’s AMI manager said, “[What] you described is a mesh technology ... where the meter is essentially talking a web to each other” [sic] (5 T 790).

Summing things up Dr. Carpenter said, “Exposure to radio frequency radiation has been shown to result in human disease, and we should take every step within reason to avoid increased exposure (10 T 2505).

E. Communication

The number of customers choosing to participate in the opt-out program has an impact on a number of issues. Some directly relate to cost. For example, the expense of customizing the billing system is shared among those opting out. If more people opt out each customer pays less. In a more general sense, if many customers opt-out the success of the AMI smart meter program itself may be jeopardized.

Therefore, DTE has questionable motivation to fully inform its customers as to the full extent of the opt out program including any explanation as to why a customer may choose to do so. The usual reason given by DTE for opting out is “regardless of reason” (from their website).

For a customer, that begs the question, “Why would I want to opt out?” No answer is ever provided that would inform that question. The majority of concerns among those customers that opt out involve health and privacy but no “balanced” view is even attempted in DTE material. Rather a “myth-busting” page exists at their website to quell any customer concerns. Controversy is never alluded to nor the history of municipal resolutions that questioned smart meters.

That said, it is also true that the appropriate web pages regarding AMI and opting out are not easily located at the DTE website. And the use of synonymous terms such as smart meter, AMI, and advanced meter only further confuses the public.

Mr. Sitkauskus testified that customers are told of the opt out option in the letter informing them of the upcoming installation of the new AMI meter. But like at the

website no explanation is provided that would allow a customer to make an informed decision. Only costs are provided.

DTE advertises a lot. Their TV and radio ads are commonly heard in the metro Detroit market. Exhibit A-3 C8 shows a 2015 ad budget of about \$3.7M. Years 2013 and 2014 show similar numbers. But according to Mr. Sitkauskus' testimony no money is spent on radio, TV, newspaper and other print media to inform the public of an opt out option (5 T 762-763

If the full base of DTE's customers were fully informed regarding the issues engendered in the opt out program many more customers may choose to opt out.

F. Costs

As of the end of May, 2015 DTE reports 5,164 customers had opted out. It was stated that the cost of an AMI is about \$100 with another \$15 incurred as a cost of installation (5 T 749); so a total cost of \$115.

If DTE did not replace those opt-out meters a savings of about \$594,000 could be realized. Moreover, the costs to those customers for the initial opt out charge could be saved; that's \$67.20 associated with a technician's visit to disable the radio transmitter. That direct savings to the customer is about \$347,000. In total, something approaching a million dollars (\$941K) is involved here.

How many more DTE customers opt out remains to be seen. But in U-17053 where the opt out rates were set, Mr. Steven McLean, manager of the Rates and Tariffs Section within the Regulated Energy Division of the Michigan Public Service Commission, took

issue with DTE's forecast and submitted testimony that a forecast of 15,500 customers was more likely – based on similar cases (U-17053 4 T 579).

DTE's lack of communication and advertising may play a role here. Using Mr. McLean's number of 15,500 opt outs, the savings increase to:

About a \$1.8M savings in costs for the AMI meter.

And over \$1M in direct savings to the customer who no longer require a site visit.

The result is a total savings of about \$2.8M. Even with certain costs still embedded in the opt out, most of that money is saved.

It is of concern that DTE did not thoroughly investigate other approaches and technologies for investment before embracing the AMI program. When asked, "Did you run any cost benefit analysis concerning utilizing other technologies, such as existing internet systems, existing communications systems, rather than the AMI program?" Mr. Sitkauskus answered, "No."

Similarly, when asked, "Did you do any cost benefit analysis relating to assumptions that the Company would not implement an AMI program but would stick with the existing legacy meters?" he also answered, "No" (5 T 811).

It would seem prudent that given an investment of greater than \$500M (9 T 2334) all options would be explored.

A disadvantage of the AMI wireless approach is the vulnerability of such technology to computer and network hacking. Consequently DTE has a cyber security unit staffed with

35 employees (5 T 770-771). Since these are skilled employees their fully loaded employment costs are estimated at \$150K-\$200K. At the low end that's \$5.3M. At the higher end that's \$7M. Some of these FTEs may be required under any circumstances but using wireless computer networks demands cyber security personnel and incurs these overhead costs.

The concept of "instant on" or "vampire" power received attention in the proceedings. This is the small yet constant electricity flow that feeds electronic appliances so they respond instantly when powered on. Industry sources estimate the loss at \$19B annually. Mr. Sitkauskus has no awareness of DTE addressing this issue though undoubtedly DTE shares in that loss which increases the cost of its service to its customers (5 T 771, 778).

Regarding long term liability as a consequence of constant exposure to RF emissions from smart meters and as described by Dr. Carpenter and is sometimes compared to smoking and asbestos. Mr. Sitkauskus testified that to the best of his knowledge DTE had no legal immunity from such future claims nor was such a liability built into the cost model (5 T 779). This is a risk that may later burden customers and should be evaluated by regulators.

Regarding, Net Present Value analyses as described by Mr. Coppola, an energy industry expert:

"As can be observed from the three PV analyses, the net financial benefits can vary significantly from one update to the next due to changing assumptions and updated information. Such large variations do not inspire confidence that the projected cost

savings in particular are sufficiently firm to be relied on as reasonably achievable” (9 T 2332).

And this lead to concerns regarding the actual to-be-realized benefits from the AMI program. “It is ... an inopportune time ... to stop updating the cost/benefit analysis now that the installation is reaching completion and the financial benefits should begin to be realized On the contrary, going forward the Commission needs to see more than ever updated cost/benefit analyses to assess whether or not the program was actually successful” (9 T 2333).

G. Self-Reported Meter Readings

Mr. Sitkauskas dismissed self-reporting of meter readings. He does this by stating that though a customer has the “right” to report a meter reading, DTE has the “right” to read its meter (Rule 460.115) and attempts to do so every month (5 T 801-802). But there is no need when someone self-reports.

Self-report can be used as an alternative. The primary concern, presumably, then is long-term accuracy of the read. It is understood that DTE is entitled to fair compensation for use of their product. That can be done with audits, say every six months or so, to insure accuracy. Concern with short-term apartment residents or other transients is where security deposits and credit ratings can come into play. Surely for a homeowner who has lived in their residence for, say, thirty years their credit worthiness is known. Many, many businesses take such credit ratings into account. For DTE to reject this approach is self serving to their initial argument that they don’t want to do this a different way.

H. Apartment and Condominium Residents

Customers who opt-out but are living in apartment and condominium complexes where dozens of meters are clustered together will not receive from DTE the benefit for which they are being charged. This is particularly relevant for residents who have medical conditions, including radio frequency (RF) sensitivity, that motivate their opting-out.

Turning off one transmitter of, say, 36 AMI meters will do little to alter the exposure to RF of a resident living close to a meter cluster. DTE's standard reply is someone can opt-out for any reason. But by being so broad in their statement DTE is effectively avoiding confronting the specific reasons that motivate people to opt-out.

Here again it is argued that a person in a circumstance as described above, who pays money to DTE to opt-out due to medical reasons will be sold a worthless service and be financially exploited. In such a situation a customer should not be charged at all for opting-out and more serious remedies may need to be explored by the MPSC to resolve the opt-out issue for the entire apartment building or condominium complex.

III, Conclusions and Requested Relief

1. DTE customers who choose to retain their current, fully functional analog meter should be allowed to do so. There is no benefit from an AMI meter that has its transmitter disabled and by foregoing the AMI meter DTE is saved the cost of purchase and customers are saved the cost of a site visit.

2. There should be no additional opt out charges but DTE and MPSC might find this a negotiable point with customers – if an analog meter can be retained and if DTE can adopt a customer centric orientation.
3. The body of biomedical research literature and the Precautionary Principle further justify a customer's choice to reject any form of an AMI digital smart meter.
4. Forced shut offs for not accepting an AMI smart meter need to stop immediately.
5. Cost benefit analyses should be ongoing in order to determine the end-state value of the AMI program. Additionally, current estimates have large variations and are suspect.
6. DTE's forecasted numbers for the expected total number of opt-out customers should be rejected. The MPSC offered larger numbers based on similar cases elsewhere. Customers have not been fully informed as to the pros and cons of the AMI program. It is argued that many more customers will opt-out once they are fully informed – and this has a significant bearing on various cost calculations.
7. Customers who choose to opt-out should be allowed to self-report their own meter readings. Provisions can be made to insure the veracity of the reads. This can save most of the cost attributed to meter readers.

8. Residents living in apartments or condos need special consideration since they may be in close proximity to large clusters of meters. There should be no charge for opting-out since they will not realize benefits turning off a single transmitter and the MPSC needs to consider additional remedies in this type of situation.
9. Regulators should be concerned with the wasted loss attributable to “instant on” power trickle. Motivation needs to be created to have electricity producers actively engage with manufacturers and the public to eliminate this loss.
10. Regulators need to engage in an immediate risk analysis regarding the long term liability associated with continuous exposure to RF emissions from smart meters. Like with smoking and asbestos, for example, there may be considerable liability ahead. Take note that Lloyds of London, one of the world’s oldest and best-known insurers, has recently placed clauses in its contracts excluding liability coverage for consequences of radio frequency (RF) exposure – as is emitted by AMI smart meters.

Respectfully submitted,

A handwritten signature in black ink that reads "Richard Meltzer". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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_____)	

PROOF OF SERVICE

Richard Meltzer, states that on July 28, 2015, he did cause to be served by email attachment, his Initial Brief for case U-17767 on the persons identified on the attached service list.

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