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March 16, 2012

Mary Jo Kunkle
Executive Secretary
Michigan Public Service Commission
PO Box 30221
Lansing, MI 48909-7721

Re: Case No. U-17000
MPSC Motion re Smart Meters
Response of Michigan's Electric Cooperatives

Dear Ms. Kunkle:

Enclosed, for electronic filing, please find Response of Alger Delta Cooperative Electric Association, Cherryland Electric Cooperative, Cloverland Electric Cooperative, Great Lakes Energy Cooperative, HomeWorks Tri-County Electric Cooperative, Midwest Energy Cooperative, Ontonagon County Rural Electrification Association, Presque Isle Electric & Gas Co-op, and Thumb Electric Cooperative in the above-referenced matter.

If you have any questions, please contact me.

Sincerely,

DYKEMA GOSSETT PLLC

Shaun Johnson
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cc: MECA Member Managers
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STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to review issues bearing on the deployment of smart meters by regulated electric utilities in Michigan.	))))	Case No. U-17000

RESPONSE OF ALGER DELTA COOPERATIVE ELECTRIC ASSOCIATION, CHERRYLAND ELECTRIC COOPERATIVE, CLOVERLAND ELECTRIC COOPERATIVE, GREAT LAKES ENERGY COOPERATIVE, HOMEWORKS TRI-COUNTY ELECTRIC COOPERATIVE, MIDWEST ENERGY COOPERATIVE, ONTONAGON COUNTRY RURAL ELECTRIFICATION ASSOCIATION, PRESQUE ISLE ELECTRIC & GAS CO-OP, AND THUMB ELECTRIC COOPERATIVE

INTRODUCTION

On January 12, 2012, the Michigan Public Service Commission directed the state's electric utilities, including Alger Delta Cooperative Electric Association, Cherryland Electric Cooperative, Cloverland Electric Cooperative, Great Lakes Energy Cooperative, HomeWorks Tri-County Electric Cooperative, Midwest Energy Cooperative, Ontonagon Country Rural Electrification Association, Presque Isle Electric & Gas Co-p, and Thumb Electric Cooperative (collectively, the "Cooperatives") to submit information related to:

> (1) the electric utility's existing plans for the deployment of smart meters in its service territory; (2) The estimated cost of deploying smart meters throughout its service territory and any sources of funding; (3) An estimate of the savings to be achieved by the deployment of smart meters; (4) An explanation of any other non-monetary benefits that might be realized from the deployment of smart meters; (5) Any scientific information know to the electric utility that bears on the safety of the smart meters to be deployed by that utility; (6) An explanation of the type of information that will be gathered by the electric utility through the use of smart meters; (7) An explanation of the steps that the electric utility intends to take to safeguard the privacy of the customer information so gathered; (8) Whether the electric utility intends to allow customers to opt out of having a smart meter; and (9) How the electric utility intends to recover the cost of an opt out program if one will exist.

Commission Order, *In the matter, on the Commission's own motion, to review issues bearing on the deployment of smart meters by regulated electric utilities in Michigan,* Dkt. No. U-17000, January 12, 2012 (the "Commission's Order"), p 2. For administrative efficiency, the Cooperatives file this consolidated Response to the Commission's Order.

I. GENERAL COMMENTS

A. Handling customer questions and complaints about advanced metering requires effective communication. It is imperative that not all technologies be lumped into the category of "smart meters." Customers must understand what type of technology their utility uses.

The Cooperatives take great pride in being leaders in advancing the Nation's policy of supporting "the modernization of the Nation's electricity transmission and distribution system to maintain a reliable and secure electricity infrastructure that can meet future demand growth." Energy Independence and Security Act of 2007, Tit. 9, § 1301 (Pub. L. 110-140). Indeed, many of the Cooperatives began using advanced metering technologies many years ago. It is **very** important, however, for both the public and the Commission to understand what type of technologies the Cooperatives use and what those technologies are capable of doing. The Cooperatives believe that many of the consumer complaint issues described in the Commission's Order can be alleviated through effective and open communication with consumers—communication that must begin with an explanation of what type of technology the electric utility is using.[1]

[1] Indeed, although many of the Cooperatives have been using advanced metering technology for several years, most of the Cooperatives have received no complaints about the meters, and those Cooperatives receiving complaints have found that once a member-consumer actually understands what type of technology the Cooperative is using and how that technology works, the member-consumer no longer is no longer concerned. In the Cooperatives' experience, many member-consumers become alarmed when they read misleading and/or false information in the media and on self-interested websites regarding smart-meters. Once a member-consumer is educated, however, he or she is no longer concerned.

It is important to note that the Commission's Order never defines the term "smart meter." Respectfully, the Cooperatives believe that using terms like "smart meter" without explaining the technologies employed by specific utilities only adds to the customer relations issues described in the Commission's Order. Stated differently, the Cooperatives do not believe that it is in the industry's best interests to use the term "smart meter" to describe all meters using advanced technologies. Indeed, the Cooperatives have a strong interest in ensuring that the public understands that not all meters labeled "smart meters" use the same technologies.

1. The Cooperatives' meters do not use radio frequencies or collect personal information.

As explained in each of the Cooperatives' specific responses, with the exception of one 10-meter pilot program, those Cooperatives currently using advanced metering employ automated meter reading ("AMR") technology. AMR technology is much different from the "smart meters" that are the target of the local government resolutions attached to the Commission's Order. The technology employed by the Cooperatives consists of a circuit board mounted in each meter that is programmed to send the meter reading (i.e. kilowatt-hours consumed) **through the power line**. In short, the technologies used by the Cooperatives monitor consumption and send the readings over the power line—in other words, the meter does not utilize a wireless system to communicate with the cooperative. Because the technology communicates over the physical wires that make up the power distribution system, the Cooperatives' technology **does not use radio transmissions or rely on wireless communication technology of any type. It does not produce radiation or radio frequency transmission and it does not emit radio frequency signals or interference**.

Furthermore, none of the Cooperatives employs technology that is enabled to communicate with or control appliances or other devices in a consumers' home or business**.** Nor

is it capable of sending consumption data or price signals directly to the consumer. As is clear, then, the advanced meters employed by the Cooperatives should not raise the same health or privacy "issues" raised by the "smart meters" described in the resolutions attached to the Commission's Order and/or the several "form" comments already filed in this docket. There are no radio frequency emissions, thus no potential "health" concerns.[2] And there are no individual appliance data collections, and no personal information collections, thus no privacy concerns. And to the extent there are other privacy concerns raised, it is critical to remember that the Cooperatives are all member-owned non-profit entities. In other words, the Cooperatives customers are their owners—they are all governed by member-consumer-elected boards. This structure promotes and supports policies of strict confidence and privacy in all of the Cooperatives. Indeed, many of the Cooperatives have adopted policies limiting the disclosure of member-consumer information under any circumstance, and all of the Cooperatives have built a culture of privacy and security—they constantly monitor and assess risks, conduct employee training, restrict access to information, and strive to ensure the accuracy of all information in their possession.

It must also be understood that there are already several state and federal laws that protect consumers in various different transactions, including, but not limited to the following:

- The Electronic Communications Privacy Act;
- The Computer Fraud and Abuse Act;
- The Gramm-Leach-Bliley Act;

[2] Although the Cooperatives do not use technology that emits radio frequencies, the Cooperatives do not believe that cited heath concerns are valid. Even meters that use a wireless communication system emit radio frequencies that are several thousand times less than those emitted from a cell phone. *See* The California Counsel on Science and Technology's 2011 report on wireless meter technologies, available at: http://www.occeweb.com/pu/smartgrid/cali%20Health.pdf.

- The Fair Credit Reporting Act;
- The Federal Trade Commission's Red Flags Rule; and,
- The Michigan Social Security Number Privacy Act.

B. <u>AMR technology provides significant benefits.</u>

There is no question that the AMR technology employed by the Cooperatives has revolutionized the electric cooperative business for the better. The benefits are real, and they are numerous. Before AMR, the Cooperatives conducted manual meter reads and relied upon member-consumer meter readings and estimates. Especially in the several rural areas served by the Cooperatives, manual meter reads significantly increased costs, and member meter readings or estimates often led to large bills when an actual meter read occurred. AMR solves all of these issues. In addition, AMR technology allows for significantly increased outage response times—the Cooperatives can proactively identify member outages through meter interrogation where previously members had to inform their cooperative of an outage. The same is true for determining whether restoration has occurred. Indeed, AMR technologies were immensely helpful to those Cooperatives suffering from storm damage from the large snowfall that occurred on March 2nd and 3rd of this year. Without AMR, restoration would have taken significantly longer.

In addition to cost savings and outage assistance, there are several other advantages to using AMR technology, including, but not limited to the following:

- Employee and public safety by eliminating employee travel time and on-site visits;
- Environmental advantages by reducing travel and fuel consumption;
- Reduction in bill disputes;
- Easy account transfers;

- Decrease in meter tampering and energy theft;
- More efficient system planning; and,
- Member-consumer access to consumption data.

With the above in mind, the following are the specific responses for each Cooperative.

II. SPECIFIC RESPONSES TO THE COMMISSION'S ORDER

A. Alger Delta Cooperative Electric Association

1. The electric utility's existing plans for the deployment of smart meters in its service territory: Alger Delta began using the Hunt Technologies TS2 AMR meter system in 2004—the meters are fully deployed in Alger Delta's entire system.

2. The estimated cost of deploying smart meters throughout its service territory and any sources of funding: N/A—Alger Delta is already fully deployed.

3. An estimate of the savings to be achieved by the deployment of smart meters: N/A—Alger Delta is already fully deployed, and has been for several years. Alger Delta has realized significant monetary savings since switching to AMR in 2004.

4. An explanation of any other non-monetary benefits that might be realized from the deployment of smart meters: There are several benefits to an AMR system, including: accuracy, redundancy, providing more information to consumers upon request (i.e. high bill disputes, etc.), security, environmental benefits, reduced labor, and faster power restoration. (See the benefits discussion above.)

5. Any scientific information known to the electric utility that bears on the safety of the smart meters to be deployed by that utility: None known. There have been studies showing that meters using radio frequencies are safe, but again, this system does not even use radio frequencies. There are no safety issues associated with this system.

6. An explanation of the type of information that will be gathered by the electric utility through the use of smart meters: Kilowatt hours consumed, meter number, serial number, and account number. The meters do not collect personal information or control appliances.

7. An explanation of the steps that the electric utility intends to take to safeguard the privacy of customer information so gathered: As already noted, AMR does not collect the type of information collected by other "smart meters." Regardless, Alger Delta has developed a culture of privacy and security—it

constantly monitors and assesses risks, conducts employee training, restricts access to information, and strives to ensure the accuracy of all information in its possession.

8. Whether the electric utility intends to allow customers to opt out of having a smart meter: No. Alger Delta's tariffs provide that Alger Delta "reserves the right to make final decisions with respect to methods and equipment used in measurement of loads for billing purposes." At this time, Alger Delta believes that AMR technology is in the cooperative's and the member-consumer's best interests.

9. How the electric utility intends to recover the cost of an opt out program if one will exist: N/A.

B. <u>Cherryland Electric Cooperative</u>

1. The electric utility's existing plans for the deployment of smart meters in its service territory: Cherryland has been fully deployed with Aclara/TWACS (two way automated communication system) AMR meters since 2005.

2. The estimated cost of deploying smart meters throughout its service territory and any sources of funding: N/A—Cherryland is already fully deployed.

3. An estimate of the savings to be achieved by the deployment of smart meters: N/A—Cherryland is already fully deployed, and has been for several years. Cherryland has realized significant monetary savings since switching to AMR in 2005.

4. An explanation of any other non-monetary benefits that might be realized from the deployment of smart meters: There are several benefits to an AMR system, including: accuracy, redundancy, providing more information to consumers upon request (i.e. high bill disputes, etc.), security, environmental benefits, reduced labor, and faster power restoration. (See the benefits discussion above.)

5. Any scientific information known to the electric utility that bears on the safety of the smart meters to be deployed by that utility: None known. There have been studies showing that meters using radio frequencies are safe, but again, this system does not even use radio frequencies. There are no safety issues associated with this system.

6. An explanation of the type of information that will be gathered by the electric utility through the use of smart meters: Kilowatt hours consumed, meter number, serial number, and account number. The meters do not collect personal information or control appliances.

7. An explanation of the steps that the electric utility intends to take to safeguard the privacy of customer information so gathered: As already noted, AMR does not collect the type of information collected by other "smart meters." Regardless, Cherryland has developed a culture of privacy and security—it constantly monitors and assesses risks, conducts employee training, restricts access to information, and strives to ensure the accuracy of all information in its possession.

8. Whether the electric utility intends to allow customers to opt out of having a smart meter: No. Cherryland's tariffs provide that Cherryland "reserves the right to make final decisions with respect to methods and equipment used in measurement of loads for billing purposes." At this time, Cherryland believes that AMR technology is in the cooperative's and the member-consumer's best interests.

9. How the electric utility intends to recover the cost of an opt out program if one will exist: N/A.

C. <u>Cloverland Electric Cooperative</u>

1. The electric utility's existing plans for the deployment of smart meters in its service territory: Cloverland has been deployed with Aclara/TWACS AMR meters since 2006. It is currently deployed at approximately 30,887 meters. Cloverland expects to be fully deployed by the end of 2013.

2. The estimated cost of deploying smart meters throughout its service territory and any sources of funding: Cloverland expects to spend $4,000,000 in 2012 and 2013 to deploy the AMR technology in its entire service territory.

3. An estimate of the savings to be achieved by the deployment of smart meters: Cloverland has realized significant monetary savings since switching to AMR in 2006.

4. An explanation of any other non-monetary benefits that might be realized from the deployment of smart meters: There are several benefits to an AMR system, including: accuracy, redundancy, providing more information to consumers upon request (i.e. high bill disputes, etc.), security, environmental benefits, reduced labor, and faster power restoration. (See the benefits discussion above.)

5. Any scientific information known to the electric utility that bears on the safety of the smart meters to be deployed by that utility: None known. There have been studies showing that meters using radio frequencies are safe, but again, this system does not even use radio frequencies. There are no safety issues associated with this system.

6. An explanation of the type of information that will be gathered by the electric utility through the use of smart meters: Kilowatt hours consumed,

meter number, serial number, and account number. The meters do not collect any personal information or control appliances.

7. An explanation of the steps that the electric utility intends to take to safeguard the privacy of customer information so gathered: As already noted, AMR does not collect the type of information collected by other "smart meters." Regardless, Cloverland has developed a culture of privacy and security—it constantly monitors and assesses risks, conducts employee training, restricts access to information, and strives to ensure the accuracy of all information in its possession.

8. Whether the electric utility intends to allow customers to opt out of having a smart meter: No. Cloverland's tariffs provide that Cloverland "reserves the right to make final decisions with respect to methods and equipment used in measurement of loads for billing purposes." At this time, Cloverland believes that AMR technology is in the cooperative's and the member-consumer's best interests.

9. How the electric utility intends to recover the cost of an opt out program if one will exist: N/A.

D. <u>Great Lakes Energy Cooperative</u>

1. The electric utility's existing plans for the deployment of smart meters in its service territory: Great Lakes has been deployed with the ITRON/TWACS AMR system since 2004.

2. The estimated cost of deploying smart meters throughout its service territory and any sources of funding: N/A—Great Lakes has been fully deployed since 2004.

3. An estimate of the savings to be achieved by the deployment of smart meters: Great Lakes has realized significant monetary savings since switching to AMR in 2004.

4. An explanation of any other non-monetary benefits that might be realized from the deployment of smart meters: There are several benefits to an AMR system, including: accuracy, redundancy, providing more information to consumers upon request (i.e. high bill disputes, etc.), security, environmental benefits, reduced labor, and faster power restoration. (See the benefits discussion above.)

5. Any scientific information known to the electric utility that bears on the safety of the smart meters to be deployed by that utility: None known. There have been studies showing that meters using radio frequencies are safe, but again, this system does not even use radio frequencies. There are no safety issues associated with this system.

6. An explanation of the type of information that will be gathered by the electric utility through the use of smart meters: Kilowatt hours consumed, meter number, serial number, and account number. The meters do not collect any personal information or control appliances.

7. An explanation of the steps that the electric utility intends to take to safeguard the privacy of customer information so gathered: As already noted, AMR does not collect the type of information collected by other "smart meters." Regardless, Great Lakes has developed a culture of privacy and security—it constantly monitors and assesses risks, conducts employee training, restricts access to information, and strives to ensure the accuracy of all information in its possession.

8. Whether the electric utility intends to allow customers to opt out of having a smart meter: No. Great Lakes' tariffs provide that Great Lakes "reserves the right to make final decisions with respect to methods and equipment used in measurement of loads for billing purposes." At this time, Great Lakes believes that AMR technology is in the cooperative's and the member-consumer's best interests.

9. How the electric utility intends to recover the cost of an opt out program if one will exist: N/A.

E. <u>HomeWorks Tri-County Electric Cooperative</u>

1. The electric utility's existing plans for the deployment of smart meters in its service territory: Tri-County has been deployed with the Cooper Power Systems AMR system since 2007.

2. The estimated cost of deploying smart meters throughout its service territory and any sources of funding: N/A—Tri-County has been fully deployed since 2010.

3. An estimate of the savings to be achieved by the deployment of smart meters: Tri-County has realized significant monetary savings since switching to AMR.

4. An explanation of any other non-monetary benefits that might be realized from the deployment of smart meters: There are several benefits to an AMR system, including: accuracy, redundancy, providing more information to consumers upon request (i.e. high bill disputes, etc.), security, environmental benefits, reduced labor, and faster power restoration. (See the benefits discussion above.)

5. Any scientific information known to the electric utility that bears on the safety of the smart meters to be deployed by that utility: None known. There have been studies showing that meters using radio frequencies are safe, but

again, this system does not even use radio frequencies. There are no safety issues associated with this system.

6. An explanation of the type of information that will be gathered by the electric utility through the use of smart meters: Kilowatt hours consumed, meter number, serial number, meter voltage, outage and load profile data, and blink count information. Some meters collect hourly load data. The meters do not collect any personal information or control appliances.

7. An explanation of the steps that the electric utility intends to take to safeguard the privacy of customer information so gathered: As already noted, AMR does not collect the type of information collected by other "smart meters." Regardless, Tri-County has developed a culture of privacy and security—it constantly monitors and assesses risks, conducts employee training, restricts access to information, and strives to ensure the accuracy of all information in its possession.

8. Whether the electric utility intends to allow customers to opt out of having a smart meter: No. Tri-County's tariffs provide that Tri-County "reserves the right to make final decisions with respect to methods and equipment used in measurement of loads for billing purposes." At this time, Tri-County believes that AMR technology is in the cooperative's and the member-consumer's best interests.

9. How the electric utility intends to recover the cost of an opt out program if one will exist: N/A

F. <u>Midwest Energy Cooperative</u>

1. The electric utility's existing plans for the deployment of smart meters in its service territory has been fully deployed with Aclara/TWACS AMR meters since 2005.

2. The estimated cost of deploying smart meters throughout its service territory and any sources of funding: N/A—Midwest has been fully deployed since 2005.

3. An estimate of the savings to be achieved by the deployment of smart meters: Midwest has realized significant monetary savings since switching to AMR.

4. An explanation of any other non-monetary benefits that might be realized from the deployment of smart meters: There are several benefits to an AMR system, including: accuracy, redundancy, providing more information to consumers upon request (i.e. high bill disputes, etc.), security, environmental benefits, reduced labor, and faster power restoration. (See the benefits discussion above.)

5. Any scientific information known to the electric utility that bears on the safety of the smart meters to be deployed by that utility: None known. There have been studies showing that meters using radio frequencies are safe, but again, this system does not even use radio frequencies. There are no safety issues associated with this system.

6. An explanation of the type of information that will be gathered by the electric utility through the use of smart meters: Kilowatt hours consumed, meter number, serial number, meter voltage, and account number. The meters do not collect any personal information or control appliances.

7. An explanation of the steps that the electric utility intends to take to safeguard the privacy of customer information so gathered: As already noted, AMR does not collect the type of information collected by other "smart meters." Regardless, Midwest has developed a culture of privacy and security—it constantly monitors and assesses risks, conducts employee training, restricts access to information, and strives to ensure the accuracy of all information in its possession.

8. Whether the electric utility intends to allow customers to opt out of having a smart meter: No. Midwest's tariffs provide that Midwest "reserves the right to make final decisions with respect to methods and equipment used in measurement of loads for billing purposes." At this time, Midwest believes that AMR technology is in the cooperative's and the member-consumer's best interests.

9. How the electric utility intends to recover the cost of an opt out program if one will exist: N/A

G. <u>Ontonagon Country Rural Electrification Association</u>

1. The electric utility's existing plans for the deployment of smart meters in its service territory: Ontonagon has been fully deployed with the Hunt Technologies TS1 AMR system since 2003.

2. The estimated cost of deploying smart meters throughout its service territory and any sources of funding: N/A—Ontonagon has been fully deployed since 2003.

3. An estimate of the savings to be achieved by the deployment of smart meters: Ontonagon has realized significant monetary savings since switching to AMR.

4. An explanation of any other non-monetary benefits that might be realized from the deployment of smart meters: There are several benefits to an AMR system, including: accuracy, redundancy, providing more information to consumers upon request (i.e. high bill disputes, etc.), security, environmental

benefits, reduced labor, and faster power restoration. (See the benefits discussion above.)

5. Any scientific information known to the electric utility that bears on the safety of the smart meters to be deployed by that utility: None known. There have been studies showing that meters using radio frequencies are safe, but again, this system does not even use radio frequencies. There are no safety issues associated with this system.

6. An explanation of the type of information that will be gathered by the electric utility through the use of smart meters: Kilowatt hours consumed, meter number, serial number, and account number. The meters do not collect any personal information or control appliances.

7. An explanation of the steps that the electric utility intends to take to safeguard the privacy of customer information so gathered: As already noted, AMR does not collect the type of information collected by other "smart meters." Regardless, Ontonagon has developed a culture of privacy and security—it constantly monitors and assesses risks, conducts employee training, restricts access to information, and strives to ensure the accuracy of all information in its possession.

8. Whether the electric utility intends to allow customers to opt out of having a smart meter: No. Ontonagon's tariffs provide that Ontonagon "reserves the right to make final decisions with respect to methods and equipment used in measurement of loads for billing purposes." At this time, Ontonagon believes that AMR technology is in the cooperative's and the member-consumer's best interests.

9. How the electric utility intends to recover the cost of an opt out program if one will exist: N/A

H. <u>Presque Isle Electric & Gas Co-op</u>

1. The electric utility's existing plans for the deployment of smart meters in its service territory: Presque Isle began a 10-meter pilot program in 2011 using SmartSynch technologies.

2. The estimated cost of deploying smart meters throughout its service territory and any sources of funding: Presque Isle is in the very beginning stages of a 10-meter pilot program. It has not evaluated the benefits of its pilot system nor considered expanding it at this time.

3. An estimate of the savings to be achieved by the deployment of smart meters: Not yet known.

4. An explanation of any other non-monetary benefits that might be realized from the deployment of smart meters: Not yet know.

5. Any scientific information known to the electric utility that bears on the safety of the smart meters to be deployed by that utility: There have been several studies showing that these types of meters are safe, including studies by the Edison Electric Institute, the California Council on Science and Technology, and the Utilities Telecom Council.

6. An explanation of the type of information that will be gathered by the electric utility through the use of smart meters: Kilowatt hours consumed, meter number, serial number, and account number. The meters do not collect any personal information or control appliances.

7. An explanation of the steps that the electric utility intends to take to safeguard the privacy of customer information so gathered: Although Presque Isle is only using a 10-meter pilot program right now, it is still important to point out that it has developed a culture of privacy and security—it constantly monitors and assess risks, conducts employee training, restricts access to information, and strives to ensure the accuracy of all information in its possession.

8. Whether the electric utility intends to allow customers to opt out of having a smart meter: Presque Isle has not yet had to consider this option, because it is just in the beginning stages of its pilot program. But if Presque Isle determines that it will move forward with some type of advanced metering technology, it will likely not allow for opt outs. Presque Isle's tariffs provide that it "reserves the right to make final decisions with respect to methods and equipment used in measurement of loads for billing purposes."

9. How the electric utility intends to recover the cost of an opt out program if one will exist: N/A

I. Thumb Electric Cooperative

1. The electric utility's existing plans for the deployment of smart meters in its service territory: Thumb has no current plans to switch meter technologies at this time. It is currently evaluating different options.

2. The estimated cost of deploying smart meters throughout its service territory and any sources of funding: Because it is just in the first stages of evaluating this issue, Thumb has not yet developed a cost estimate.

3. An estimate of the savings to be achieved by the deployment of smart meters: Not yet known.

4. An explanation of any other non-monetary benefits that might be realized from the deployment of smart meters: Not yet know.

5. Any scientific information known to the electric utility that bears on the safety of the smart meters to be deployed by that utility: There have been several studies showing that these types of meters are safe, including studies by

the Edison Electric Institute, the California Council on Science and Technology, and the Utilities Telecom Council.

6. An explanation of the type of information that will be gathered by the electric utility through the use of smart meters: Not yet known.

7. An explanation of the steps that the electric utility intends to take to safeguard the privacy of customer information so gathered: Although Thumb does not yet use advanced meter technology, it is still important to point out that it has developed a culture of privacy and security—it constantly monitors and assess risks, conducts employee training, restricts access to information, and strives to ensure the accuracy of all information in its possession.

8. Whether the electric utility intends to allow customers to opt out of having a smart meter: Thumb has not yet had to consider this option, because it has not switched meters. But if Thumb determines that it will move forward with some type of advanced metering technology, it will likely only allow for opt outs if the member-consumer pays a significant monthly fee to recover all costs associated with reading the meter manually. Thumb's tariffs provide that it "reserves the right to make final decisions with respect to methods and equipment used in measurement of loads for billing purposes."

9. How the electric utility intends to recover the cost of an opt out program if one will exist: See above.

Respectfully submitted,

DYKEMA GOSSETT PLLC

Attorneys for:

Alger Delta Cooperative Electric Association, Cherryland Electric Cooperative, Cloverland Electric Cooperative, Great Lakes Energy Cooperative, HomeWorks Tri-County Electric Cooperative, Midwest Energy Cooperative, Ontonagon Country Rural Electrification Association, Presque Isle Electric & Gas Co-op, and Thumb Electric Cooperative

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