Gentlemen:

AARP, NASUCA, NCLC, Consumers Union and Public Citizen just released, "The Need for Essential Consumer Protections: Smart Metering Proposals and the Move to Time-Based Pricing." This white paper covers a range of issues including previous smart meter pilot programs, full costs associated with advanced meters and related infrastructure, and impacts of dynamic pricing on vulnerable customer groups. The paper includes the following 7 recommendations:

1. Smart meter proposals must be cost-effective, and utilities must share the risks associated with the new technologies and the benefits used to justify the investment.

2. Time-of-use or dynamic pricing must not be mandatory; consumers should be allowed to opt-in to additional dynamic pricing options.

3. Regulators should assess alternatives to smart meters to reach the same load management goals, particularly direct load control programs.

4. Smart meter investments should enhance, not erode, existing consumer protections, especially relating to the implementation of remote disconnection, and traditional billing and dispute rights should be retained.

5. Privacy and cyber-security concerns must be addressed prior to a smart meter rollout.

6. Utilities and other policymakers should include comprehensive consumer education and bill protection programs in any evaluation or implementation of smart meter proposals.

7. Investments in Smart Grid need to be verifiable and transparent and utilities need to be held accountable for the costs they want customers to pay and the benefits they promise to deliver.

Here is the link to the report: <u>http://www.nclc.org/images/pdf/energy_utility_telecom/additional_resources/adv_meter_protection_repo</u> <u>rt.pdf</u>

Tyson Slocum, Director Public Citizen's Energy Program 215 Pennsylvania Ave SE Washington, DC 20003 202.454.5191 mobile 202.256.3152 tslocum@citizen.org http://publiccitizenenergy.org/