

**BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI**

James Dickson and Angela Dickson,

Complainants,

v.

File No. EC-2016-0230

KCP&L Greater Missouri Operations Company,

Respondent.

**Motion – Enter Exhibits into Evidence and/or Judicial Review**

Complainants James and Angela Dickson, hereby submits its motion to enter exhibits into Evidence and/or for Judicial Review.

The complainants request the court to approve submission of the following evidence to document potential health issues of the Smart Meter which was placed on the complainants' home by KCP&L/GMO. This motion is also submitted to have these documents submitted for Judicial Review in order to refute evidence submitted by KCP&L/GMO regarding the safety of Smart Meters.

This Motion is to enter the following Exhibit(s):

- BioInitiative 2012 Report including the Updated 2014 Summary to the Public.

The BioInitiative 2012 Report was prepared by 29 authors from ten countries, ten holding medical degrees (MDs), 21 PhDs, and three MsC, MA or MHPs. Among the authors are three former presidents of the Bioelectromagnetic Society, and five full members of BEMS. One distinguished author is the Chair of the Russian National Committee on Non-Ionizing Radiation. Another is a Senior Advisor to the European Environmental Agency.

KCP&L/GMO has submitted reports stating the Smart Meter is within FCC standards and is safe. The reports and representatives that testified both state that the Smart Meter is within the FCC guidelines. The BioInitiative Report is a more current analysis of the safety concerns and problems regarding exposure to electromagnetic and radiofrequency fields and addresses the outdated FCC guidelines for safety. KCP&L/GMO documents site reports from 1997, 1998 and 1998 while the BioInitiative Report includes more current data from 2007-2014.

The BioInitiative 2012 Report specifically states:

- Existing public safety limits (FCC and ICNIRP public safety limits) do not sufficiently protect public health against chronic exposure from very low-intensity exposures. If no mid-course corrections are made to existing and outdated safety limits, such delay will magnify the public health impacts with even more applications of wireless-enabled technologies exposing even greater populations around the world in daily life.
- In 2011 the World Health Organization International Agency on Cancer Research (IARC) classified radiofrequency radiation as a Group 2B Possible Human Carcinogen, joining the IARC classification of ELF-EMF that occurred in 2001.
- Since 2007, five new studies of base station level RFR at intensities ranging from less than 0.001 uW/cm<sup>2</sup> to 0.05 uW/cm<sup>2</sup> report headaches, concentration difficulties and behavioral problems in children and adolescents; sleep disturbances, headaches and concentration problems in adults.
- Bioeffects are clearly established and occur at very low levels of exposure to electromagnetic fields and radiofrequency radiation. Bioeffects can occur in the first few minutes at levels associated with cell and cordless phone use. Bioeffects can also occur from just minutes of exposure to mobile phone masts (cell towers, WI-FI, **and wireless utility smart meters that product whole body exposure.** Chronic base station level exposures can result in illness.

Please review the complete report for additional documentation regarding the negative health issues of Smart Meters.

KCP&L/GMO is using outdated information to attest to the safety of EMFs and Smart Meters. As individual consumers without the economic resources to hire expert witnesses, the complainants request the court to approve this motion and review the information contained in this document as the court's duty to protect consumers outweighs any objections from the Respondent.

Respectfully Submitted,

James Dickson

Angela Dickson

Complainants