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

James Dickson and Angela Dickson,

Complainants,

V.

KCP&L Greater Missouri Operations Company,

Respondent.

## Motion - Enter Exhibits into Evidence and/or Judicial Review

File No. EC-2016-0230

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):

• The Seletun Scientific Statement, Feb. 3, 2011. By the Karolinska Institute Department of Neuroscience.

The Seletun Scientific Statement has been published in the *Reviews on Environmental Health* (2010; 25; 307-317)

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. This scientific statement 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of the safety concerns and problems regarding exposure to electromagnetic and radiofrequency fields and addresses the outdated FCC guidelines for safety.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.

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KCP&L/GMO has testified that they meet current U.S. standards and that this is sufficient to prove the Smart Meters are safe. Statement outlines the concerns by leading scientists around the world regarding exposure to electromagnetic radiation.

Scientists who study radiofrequency radiation from wireless technologies have issued a scientific statement warning that exposures may be harming the development of children at levels now commonly found in the environment.

Statement Highlights:

• The SmartGrid concept could require every home to have a wireless electric and gas meter in place of their existing meters. If implemented, it will greatly increase the intensity of new wireless emissions in homes, schools and every other building that uses electricity and gas.

• The Scientific Panel urges a halt to the rollout of new wireless technologies, especially those that cause exposure for pregnant women and for children.

Current US and ICNIRP standards for radiofrequency and microwave radiation from wireless
technologies are entirely inadequate. They were never intended to address the kind of exposures
from wireless devices that now affect over 4 billion people.

The combined effects... place billions of people around the world at risk for cancer, neurological disease and reproductive and developmental impairments.

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



Stockholm, 2011-02-03

PRESS RELEASE from the Karolinska Institute, Department of Neuroscience, Stockholm, Sweden, February 3, 2011

Scientists Urge Halt of Wireless Rollout and Call for New Safety Standards: Warning Issued on Risks to Children and Pregnant Women

Scientists who study radiofrequency radiation from wireless technologies have issued a scientific statement warning that exposures may be harming the development of children at levels now commonly found in the environment. Pregnant women are cautioned to avoid using wireless devices themselves and distance themselves from other users.

The Seletun Scientific Statement has now been published in Reviews on Environmental Health (2010; 25: 307-317). The article recommends that lower limits be established for electromagnetic fields and wireless exposures, based on scientific studies reporting health impacts at much lower exposure levels. Many researchers now believe the existing safety limits are inadequate to protect public health because they do not consider prolonged exposure to lower emission levels that are now widespread.

"Current US and ICNIRP standards for radiofrequency and microwave radiation from wireless technologies are entirely inadequate. They never were intended to address the kind of exposures from wireless devices that now affect over 4 billion people."

(Olle Johansson, professor, The Experimental Dermatology Unit, Department of Neuroscience, Karolinska Institute, and The Royal Institute of Technology, Stockholm, Sweden)

The combined effect of cell phones, cordless phones, cell towers, WI-FI and wireless internet place billions of people around the world at risk for cancer, neurological disease and reproductive and developmental impairments.

"We are already seeing increases in health problems such as cancer and neurobehavioural impairments, even though these wireless technologies are fairly new in the last decades or so for the general public. This finding suggests that the exposures are already too high to protect people from health harm. Evidence suggests there are special risks for persons with occupational exposures to RF/MW as well as ELF."

(Elihu Richter, assoc. professor, Unit of Occupational and Environmental Medicine, Hebrew University-Hadassah School of Medicine, Jerusalem, Israel)

Safety standards also ignore the developing fetus, and young children who are more affected.

"Pregnant women and children of all ages should avoid using cell and cordless phones given



the health effects we are seeing already."

(Yuri Grigoriev, professor, Dr of Med Sci, Chairman of Russian National Committee on Non-Ionizing Radiation Protection, Moscow, Russian Federation)

Many countries are promoting wireless communications on a community-wide scale for energy management and conservation. The SmartGrid concept could require every home to have a wireless electric and gas meter in place of their existing meters. If implemented, it will greatly increase the intensity of new wireless emissions in homes, schools and every other building that uses electricity and gas.

"WI-FI routers, DECT phones and other wireless devices like baby monitors produce radio frequency emissions that will affect millions of people and babies in their homes, and should be halted until other, less harmful options are investigated."

(Lukas Margaritis, professor, Department of Cell Biology and Biophysics, Faculty of Biology, University of Athens, Athens, Greece)

The Scientific Panel urges a halt to the rollout of new wireless technologies, especially those that cause exposures for pregnant women and for children.

"New, biologically-based exposure limits are crucial to guide new technology development toward solutions that are not harmful to health. The global rollout of wireless technologies has outpaced both health studies and calls for more restrictive public safety limits." (Cindy Sage, co-editor of The Bioinitiative Report, MA, Sage Associates, Santa Barbara, CA, USA)

Copies of the Seletun Scientific Statement [Fragopoulou A, Grigoriev Y, Johansson O, Margaritis LH, Morgan L, Richter E, Sage C. "Scientific panel on electromagnetic field health risks: Consensus points, recommendations, and rationales. Scientific Meeting: Seletun, Norway, November 17-21, 2009", Rev Environ Health 2010; 25: 307-317] can be obtained from the Karolinska Institute. Contact: Prof. Olle Johansson 
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