

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 in Limine to Exclude Testimony of Julie Dragoo

Complainants James and Angela Dickson, hereby submits its Motion in Limine to exclude the testimony of Julie Dragoo as to the safety of Smart Meters.

The complainants request the court to approve this Motion in Limine regarding Ms. Dragoo's testimony regarding the safety of Smart Meters on the following grounds:

- Ms. Dragoo's background is not sufficient to attest to the safety of Smart Meters in regards to both their fire hazard and other health concerns caused by Smart Meters.
- Ms. Dragoo formal education is limited to Finance and does not include a medical degree, electrical engineering degree, mechanical engineering degree or other sufficient scientific degree which would give her the ability to make appropriate and educated statements regarding the safety of Smart Meters and Digital Meters.
- Ms. Dragoo stated in her testimony she had "not read through the specific results" when asked if she had reviewed the test results that occurred at the Dickson's residence.
- Ms. Dragoo testified that "I'm not a good expert in pulling and exchanging a meter" and thus, her testimony regarding the safety of installation is invalid.
- Ms. Dragoo was unable to answer questions from Mr. Dickson regarding:
 - How many times the Smart Meter actual emits a signal but could only state the meter was read once every four hours.
 - The cumulative effects of the Smart Meter(s) on and around the Dickson's residence.
 - If the Smart Meters have a surge protector.
 - If the Smart Meters have thinner blades.

- If the plastic back of the Smart Meters can melt faster than a metal alloy back.
- Ms. Dragoo did not have any information to refute the allegation that the Smart Meter emitted signals up to 190,000 times per day.

As Ms. Dragoo's testimony made it clear she was not an expert on Smart Meters regarding their functionality, safety features or design, her entire testimony regarding the alleged safety of Smart Meters should be stricken from the record.

As KCP&L/DMO did not provide any other witness to attest to the safety of Smart Meters and did not address or provide documentation refuting the concerns of the Dickson's regarding the cumulative effect of Smart Meters, the potential design issues including no surge protector, or details regarding any of the fire investigations, the complainants ask the court to find in favor of the complainants and that there is sufficient evidence to conclude there is a safety concern with Smart Meters and order KCP&L/GMO to replace the Dickson's meter with an Analogue meter and no additional cost or monthly reading charge.

Respectfully Submitted,

James Dickson

Angela Dickson

Complainants