

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 to Admit Rebuttal Evidence to Statement Regarding Fires Associated with KCP&L/GMO Smart Meters

Complainants James and Angela Dickson, hereby submits its Motion to Admit Rebuttal Evidence to Statement Regarding Fires Associated with KCP&L/GMO Smart Meters

The complainants request the court to approve this Motion on the following grounds:

- Ms. Dragoo testified that “The company has no evidence that AMI meters have caused any fires.”
- The article states “A KCP&L spokeswoman said the utility was investigating the fire, but she said this type of issue in the metro is very rare.” **This statement contradicts the testimony given by Ms. Dragoo that the company has no evidence that AMI meters have caused any fires.**
- The article states “the company KCP&L uses has had past issues in other places.” **This statement shows there are known reported issues.**
- The article states that “Caisley said KCP&L has had a total of six problems out of the more than 700,000 meters.” **This statement contradicts Ms. Dragoo’s statement as noted above.**
- The article states that “the utility has returned a couple of meters which have overheated to its supplier.” **This statement contradicts Ms. Dragoo’s statement as noted above.**

The Complainants request the court allow submission of the news article dated August 29, 2016 which the fire at Waverly Galbreath’s residence was potentially caused by their Smart Meter.

In addition, we request the court order all documents pertaining to the fire referred to in this article as well as the other “six problems” referred to in the article be submitted to the court to review and to include but not limited to:

- Fire Inspection Reports
- Witness Statements
- Insurance subrogation demands, letters, documents or other information pertaining to causation.
- Any and all documents pertaining to settlement discussion, releases, or settlement agreements.
- Any and all documents, reports and findings regarding causation completed by any persons or entities regarding issues with the Smart Meters.

In addition, the Complainants request KCP&L/GMO submit any and all documents regarding problems with issues the Smart Meter company had in other areas which should include but not limited to:

- Fire Inspection Reports
- Witness Statements
- Insurance subrogation demands, letters, documents or other information pertaining to causation.
- Any and all documents pertaining to settlement discussion, releases, or settlement agreements.
- Any and all documents, reports and findings regarding causation completed by any persons or entities regarding issues with the Smart Meters.

As KCP&L/DMO did not provide complete or truthful answers to the questions regarding fire issues, complaints or causation, 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 at no additional cost and no monthly reading fee.

Respectfully Submitted,

James Dickson

Angela Dickson

Complainants

KCMO smart meter fire sparks investigation

KCP&L says smart meter issues rare in metro

[Andy Alcock](#)

7:31 PM, Aug 29, 2016

11:05 PM, Aug 29, 2016

KANSAS CITY, Mo. - Nearly every home and business in the metro have one.

Kansas City Power & Light is at the tail end of a two and a half year project to install more than 700,000 smart meters across the metro.

It's a small part of the billions of dollars utilities have [invested in smart meters across the U.S.](#)

But there are serious concerns Waverly Galbreath experienced firsthand. The burn marks are visible on his KCMO home.

A burned-out circuit board is the only remaining part of the smart meter at Galbreath's home where the July fire started.



Galbreath wasn't at home when it started.

"I got a call from my neighbor and he said my house was on fire. But when I arrived, I found out the meter had exploded," he said.

A KCP&L spokeswoman said the utility is investigating the fire, but she said this type of issue in the metro is very rare.

KCP&L Vice President Chuck Caisley said in a statement to the 41 Action News Investigators, "Out of the more than 700,000 meters KCP&L has installed, we are only aware of a handful of meter malfunctions."

There are multiple smart meter makers and different models.

The company KCP&L uses has had past issues in other places.

Despite few problems in the metro, hundreds of thousands of smart meters have been recalled in the last several years across North America.

And hundreds of fires have broken out in California, Texas, Florida, Nevada, Illinois and across Canada.

"It really is a very dangerous issue and should be treated as a real unprecedented emergency in your area," said Canadian electrician Professor Curtis Bennett.

Bennett is in an ongoing Canadian legal battle over smart meters.

Bennett sent the 41 Action News Investigators thermal images showing a dangerous smart meter connection running too hot and a normal one.

"Now you've got this plastic piece of junk on their property and that's actually what's burning inside that meter base with the wires," he said.

But Caisley said KCP&L has had a total of six problems out of more than 700,000 meters.

He said the utility has returned a couple meters which have overheated to its supplier.

California insurance adjuster Norman Lambe currently has seven open smart meter fire claims on his desk.

Of the dozens of smart meter fires he's investigated, he said overheating is the major issue.

"They are sparking, they are manufacturing too much heat," he said. "In any given situation when you have too much heat and you have material to burn, meaning unfortunately wiring in the individual's home or business, you're going to have a fire."

America's utilities are spending billions of dollars to install smart meters.

The old ones with the dials, called analog meters, only recorded electricity usage, requiring a meter reader to get the information.

Smart meters transmit your usage information to the power company.

Lambe said those transmissions can cause overheating.

Canadian Brian Thiesen has spent hundreds of hours over five years researching smart meters. He produced a [video about smart meter fires](#).

"These fires are going to continue to happen because again, the basic laws of electricity are being violated," Thiesen said.

But KCP&L's statement said, "At this point, we have found nothing that leads us to believe there is a problem or safety issue with the new meters."

Galbreath has a different take.

He was without power for over a month after his home's smart meter fire. He said he's lucky the wood-shingled home didn't go up in flames.

When asked if other metro residents should be concerned about smart meters he said, "I think so, I really do."

KCP&L said the type of smart meters they're using have not been recalled.

The utility's statement also said the vast majority of house fires are caused by factors other than meters like outdated and overloaded wiring.

Bennett told the 41 Action News Investigators smart meter connections to old bases and faulty wiring are a serious part of the fire problem.

A spokesman for the Board of Public Utilities, BPU, said that utility has installed 70,000 smart meters in Wyandotte County.

BPU spokesman David Mehlhaff said there have been no reports of smart meter fires there.

To check on your own meter, Lambe said the best way is to feel your meter at the end of the day when it's cool outside.

He said if it's hot to the touch, call your utility company.

Andy Alcock can be reached at anderson.alcock@kshb.com.