While we understand that there is skepticism amongst some investors that the project can go forward in the current low gas price environment, we nonetheless, believe it might be helpful to you for us to outline as shown on Slide 10 the future capital commitment of NRG in respect to this project, should it stay on track, with NRG continuing to support it financially.

The overall message is that due to a combination of first, the very substantial sum that NRG has previously committed to the project development, particularly during the first half of 2010 after the settlement with CPS. Second, taking into account our expectation of an optimal hold amount in the project for NRG of approximately 40%, which is down from the 67% that we will own if and when TEPCO invests in a project post-loan guarantee award. And third, due to the value ascribed to NRG for its contribution of the site, NRG's cash commitment to the project going forward is less than what otherwise would be suggested by our projected ownership level.

In summary, should the project proceed to financial closing, the total cash commitment for NRG at our 40% hold level should be something just short of $800 million in aggregate, including cash invested to date. Beyond that, we are likely to have an LC commitment to a standby equity crossover line facility that will be fixed. And while that number has not yet been finally fixed, you should be thinking in the range of a few hundred million dollars maximum.

In exchange for this size investment in STP 3 & 4, we expect cash flow from dividends and tax benefits in the range of $500 million a year for the first several years of operations. Obviously, this is a very attractive return but one which we believe is well just justified given the extraordinary challenges of the undertaking.

Now pulling it back from where we hope the project will be in 2016 or 2017 to where we are here in the first quarter of 2011, you should be focused on what happens after announcements of acceptance of the loan guarantee. As the loan guarantee acceptance naturally will trigger certain funding obligations from our partners, NRG's share of cash development spent for the remainder of the development phase should approximate $50 million for all of 2011 and half that for 2012.

While our perspective 2011, 2012 development standard is perhaps substantially less than many in the market were anticipating, it remains a lot of money to us, and we're taking very seriously our commitment to retain our financial discipline around this project and prevent exposure of our balance sheet beyond the specific commitments that I've outlined in this presentation.

Now turning to Slide 11, last but certainly not least, there is the solar pipeline. I've said many times, and I'll repeat here, that in my 20 years in this business, I had never seen investment opportunities in this sector that offer more attractive combination of high returns, low construction risks, long-term PPAs and repeatable business opportunities than the utility-sized solar projects that we currently have in our advanced development portfolio.

As such, we intend to do as much of this business as we can get our hands on, with the result being that by the end of this year, we may well have a total initial equity investment in our solar portfolio that exceeds the total amount that we may ever invest in STP 3 & 4 at very attractive near-term returns. The limiting item for us in terms of these solar investments is our ability on our own to make optimal use of the considerable tax benefits which will be generated by these projects. This is a topic that Chris Schade will discuss in a few minutes.

What I will end by saying is that this extraordinary pipeline of utility-sized solar projects, which our colleagues at NRG Solar have managed to develop or acquire, provides us with a truly unique opportunity to develop over the next few years a solar portfolio of true scale and significant benefit, even in the context of the larger portfolio of NRG.

Ultimately, however, we fully recognize that the current generation of utility-sized solar and wind projects in the United States is largely enabled by favorable government policies and financial assistance. It seems likely that much of that special assistance is going to be phased out over the next few years, leaving renewable technologies to fend for themselves in the open market.

We do not believe that this will be the end of the flourishing market for solar generation. We do believe it will lead to a stronger and more accelerated transition from an industry that is currently biased towards utility-sized solar plants to one that's focused more on distributed and even residential solar solutions on rooftops and in parking lots.

We are already planning for this transition now within NRG, so that any potential decline in either the availability of utility-sized solar projects or in the attractiveness of the returns being realized on these projects, will be exceeded in aggregate by the increase in the business we are doing on smaller distributed and residential solar projects through our Green Mountain and even our Reliant retail sales channel.

With that, I'll turn it over to Mauricio.

Mauricio Gutierrez - Chief Operating Officer and Executive Vice President

Thank you, David, and good morning, everyone. NRG continued its strong operating and commercial performance during the fourth quarter, making 2010 one of NRG's best years. Slide 13 highlights a few of the key accomplishments achieved in 2010.

Starting with safety, we're particularly pleased with our record performance this year. Our OSHA recordable rate improved 26% over 2009. Our top performance remained strong with 90% availability of our baseload fleet, just shy of our 2009 level. This performance was achieved despite a forced outage event on our STP nuclear plant in November, which I will cover in more detail in the next slide.

On the environmental front, we delivered our second best year, and our FORNRG program far exceeded our 2010 goal. As I mentioned to you on our last call, controlling our cost is a priority, given the challenging economic environment our industry is facing.

Our Commercial Operations Group increased our hedge levels in 2011 and continues to look for opportunities to catch the odd years of favorable prices. We successfully transitioned to the Nodal Market in ERCOT and began integrating Green Mountain Energy and the Cottonwood combined cycle plant into our portfolio.

With respect to our projects under construction, the Indian River Unit 4 environmental back-end control project continues to be on track and on budget to be operational by January 2012. Our Middletown project in Connecticut received all major equipments in the fourth quarter and continues to be on schedule for operation this summer. Finally, the El Segundo Energy Center completed aboveground demolition of two existing units and secured major equipment orders. El Segundo is on track to be operational by the summer of 2013.

Turning to our plant performance metrics on Slide 14. Safety continues to be our number one priority. We are very proud to report that we achieved top decile in the industry, making 2010 our best OSHA recordable year. We have 25 sites with no injuries and nine sites certified or recertified as OSHA VPP Star worksites.

Net generation decreased by 6% in the fourth quarter due to mild weather across Texas and a 22-day on-plan outage at STP Unit 2 during the month of November. The forced outage event was the result of a breaker failure during routine testing and was extended to repair a reactor coolant pump seal. In order to prevent recurrence, similar electric components were checked in both units. Unit 2 has operated without any issues since it was brought back to service on November 26.

For the full year, net generation was flat from 2009 levels. Increased generation in the Northeast and South Central regions driven by the strong summer weather and the addition of Cottonwood, were offset by lower generation in California and Texas.

For 2010, our coal fleet availability finished the year above the sub-quarter performance level for the industry. WA Parish led the fleet with 92.6% availability factor, and Limestone had the best reliability for the year, with a 1.6% forced outage rate.

Our FORNRG 2.0 program exceeded the 2010 goal by $49 million, and it is on track to achieve our goal of $150 million by 2011, one year earlier than planned. Savings were achieved through a combination of reliability, capacity and efficiency improvements at generating assets and cost savings across our corporate and regional groups.

Turning to our retail operations on Slide 15, we closed out the year with another strong quarter. Volumes and margins were consistent with our forecast, while Operations delivered better-than-expected asset management and lower operational costs.

The Mass segment continues to drive segment improvement in net customer attrition with a 57% reduction in the fourth quarter versus 2009. This result was driven by marketing, sales and introduction of innovative products to meet our customer needs.

In 2010, we led Texas in innovation, enrolling over 175,000 customers on our Reliant e-Sense product and services that utilize smart grid technology. We also introduced new and unique offers like carbon-state [ph] and home protection products, adding not only incremental EBITDA but increased customer stickiness.

We continue to maintain the lowest PUC customer complaint rate while balancing customer counterpricing. Throughout 2010, we aligned to successfully demonstrate that we have stabilized customer attrition and expect to achieve zero net attrition in 2011.

In the C&I segment, both renewal and new deal win rates continue to improve. We have expanded our business in several Northeast states where we can leverage existing energy assets and increase product offerings to include products such as backlog generation. These provides a solid platform to grow our business in 2011.

Business continues to show some fundamentals as you can see on Slide 16. Weather-normalized demand grew by 2% year-on-year and ERCOT set a new winter peak low of 57 kilowatts in February, an increase of almost 2.5% from the previous record. I'd like to take this opportunity to address the events in Texas on February 2.

The men and women of NRG Texas worked very hard to help meet the high demand for electricity due to the extreme cold conditions, increasing our generation by more than 60% from the previous day. Although we had some operational issues, of the approximately 9,500 megawatts of power we had available in Texas during the low-shed event, we maintained between 97% and 91% of that capacity online. I want to thank all our employees in Texas for their dedication and extraordinary efforts during these events.

Now moving on to reserve volumes in ERCOT, we see a positive feature of our generation portfolio with reserved margins tightening faster than expected. This is to some extent reflected in the forward heat rates, as you can see on the chart on the lower right-hand quarter. We believe this trend will continue, given the robust growth and the expectation that asset retirement will outpace new builds. We have not seen as much coal-to-gas switching in Texas as we have in the Northeast and Southeast regions. In fact, cash generation was down year-on-year due to increases in new coal and wind generation in Texas.

In the Northeast, the back-end market continues to make some news. In New York, the recent FERC order to increase cost of new entry should provide a boost to capacity prices in New York City and rest of state, benefiting our New York portfolio. In PJM, prices remain uncertain until more clarity is given around the minimum offer price rule, the subsidized generation in New Jersey and Maryland and review demand outlook.

Moving on to Slide 17, you can see our detailed plan to control air emissions for each of our coal plants. As stated in our last earnings call, our plan is to invest approximately $720 million through 2015 in environmental projects tailored to comply with future regulations.

Just to remind everyone, the proposed CAIR rule does not require additional capital for compliance. The HAP MACT proposed rule should be released in mid-March, and as you can see in the table, our plant considers mercury controls on all our coal units.

Intake modifications and repowering are expected to meet once for cooling requirements. We only have dry fly ash disposals at our all coal facilities. And finally, in most of our facilities, we burn low sulfur, low chlorine PRB coal.

Moving on to our hedge profile and commodity sensitivities on Slide 18. Our baseload portfolio is now 100% hedged in 2011 and 50% hedged in 2012, providing the protection in the short term where gas prices continue to be weaker given the oversupply situation. Beyond 2012, we choose to remain significantly open.

After two years of low gas prices, we believe the downside risk is limited. Our combination of incremental demand from the power sector, particularly in light of possible coal plant retirements, some signs of the interest rate by producers, indication that drilling to home acreage may be ending, and a move from dry to wet gas production will provide better opportunities to catch our baseload portfolio in the future.

With respect to retail, we have increased our pipe load to 66% in 2011 from 57% in the third quarter. We continue to match as much generation load as possible to start maximum synergies between our retail and wholesale portfolios.

Our power and coal hedges continue to be well managed in 2011 and 2012. Given the shape of the coal curve and steep contango, we have not added any additional occasions since the last quarter. We also remain well hedged in terms of coal transportation now for some time.

Our sensitivity to commodity prices is agreeable for 2011, with 2012 to 2015 largely unchanged from last quarter. Let me remind you that this sensitivity is around our baseload portfolio. Interest expense, our portfolio is well-positioned to benefit, particularly, in the Texas and South Central regions.

With that, I will turn it over to Chris who will discuss our financial results.

Christian Schade - Chief Financial Officer and Executive Vice President

Thank you, Mauricio, and good morning. Beginning with the financial summary on Slide 20, full-year 2010 adjusted EBITDA was $2.514 billion, just shy of the record 2009 adjusted EBITDA of $2.618 billion and within our previously stated guidance of $2.5 billion to $2.55 billion. As a result of our continued strong operating performance, adjusted cash flow from operations for 2010 was robust at $1.76 billion.

The company's liquidity position at year end, excluding funds deposited by counterparties, stood at nearly $4.3 billion, a $458 million increase from December 31, 2009, liquidity of approximately $3.8 billion. Our cash balance at year end 2010 available for both working capital as well as our 2011 capital allocation program was approximately $2.9 billion.

Now turning to a summary of our 2011 guidance in Capital Allocation Plan. First, we reaffirmed the preliminary 2011 EBITDA guidance range of $1.75 billion to $1.95 billion. Second, and as part of our 2011 capital allocation program, we are planning to repurchase $180 million of common stock, and complete $240 million of term loan debt repayments and $39 million for additional facilities, all of which is consistent with NRG's commitment to return excess capital to its stakeholders. Third, in 2011, in addition to the amount deferred from 2010 as a result of extending the cash grant availability, we are currently planning to commit an additional $640 million of net investment to advance our Repowering and renewable development program, particularly, utility-scale solar.

Now turning to a more detailed review of 2010 adjusted EBITDA result from Slide 21. The company reported near record results of $2.514 billion adjusted EBITDA, only $104 million lower than the 2009 adjusted EBITDA of $2.618 billion. These results were achieved despite the decline in forward prices across all of our regions and clearly benefited from our wholesale generation hedging program and the continued strong performance of Reliant Energy.

During the year, Reliant Energy contributed $711 million of adjusted EBITDA. Comparatively, these results are lower by $158 million from 2009 as we overlined for only eight months of that year. The year-on-year decline was driven by an 18% decline in Mass margins, which were the direct result of price reductions enacted following the acquisition, as well as lower margins on customer renewals and new customer acquisitions reflective of the competitive market. All told, for 2010, Reliant saw net customer attrition rates improve to 0.4% from 0.7% in 2009 with total customers at year end steady at 1.5 million.

The wholesale business meanwhile generated $1.8 billion in adjusted EBITDA, $173 million lower as compared to a record 2009 EBITDA of $1.976 billion. The comparative year-to-date decline is largely explained by a 32% drop in baseload hedge prices in the Northeast, as well as lower margins in Texas, caused by a 60% increase in fuel costs, due largely to higher coal transportation costs at our WA Parish facility. These results were partially offset by an increase in adjusted EBITDA of $28 million from the South Central region due to increases in generation and contracted sales.

Also increasing adjusted EBITDA were our newly acquired assets, including Green Mountain Energy, Cottonwood, Northwind Phoenix, South Trent Wind Farm, as well as the full year of operations from the Blythe solar project.

For the fourth quarter, the company reported adjusted EBITDA results of $444 million, a $45 million decline versus 2009. Reliant Energy contributed $117 million of adjusted EBITDA compared to $104 million for the fourth quarter of 2009. Reliant's quarterly results were favorable $13 million driven by an improvement in operating costs primarily due to better customer payment habits as related to a decrease in bad debt expense.

In the fourth quarter of 2010, our Wholesale Generation business contributed $327 million of adjusted EBITDA, a $58 million decline compared to fourth quarter '09. The change in results can largely be attributed to the following items: In the Northeast region, 35% lower hedge prices and a 25% decrease in generation resulting in a $57 million decline in energy margins quarter-over-quarter. The decrease in generation was largely a result of coal-to-natural gas switching and offsetting this decline in energy margins were favorable year-on-year operating and maintenance expenses of $13 million.

In Texas, the 10% decline in generation at the Limestone and WA Parish facilities due to lower power prices and reduced demand led to a 6% decline in overall generation for the region. Offsetting this decline were favorable year-on-year operating expenses of $17 million that included gain on land sales of $6 million in 2010.

Now turning to Slide 22. As I mentioned a moment ago, total liquidity at year-end 2010 excluding funds deposited by hedged counterparts remained strong at nearly $4.252 billion. Total cash stood at $2.959 billion, an increase of $653 million as compared to the 2009 year-end cash balance of $2.3 billion. The drivers of the cash increase included adjusted cash from operations of $1.76 billion and debt proceeds of $1.317 billion.

These increases were offset by several items: First, five completed acquisitions totaling about $1 billion, which included $507 million for Cottonwood generation station, $357 million for Green Mountain, $100 million for Northwind Phoenix, $32 million for South Trent Wind Farm and for the U.S. solar portfolio, 720 megawatts of development projects in nine states in California and Arizona. Second, debt and fee payments totaling $813 million, including Term Loan B payments of $453 million and a repayment of a common stock fund or CSF of $190 million.

And third, capital expenditures excluding NINA of $445 million, including $199 million of maintenance, $184 million of environmental, primarily related to the Indian River Air Quality Control System project, and $62 million of growth investments. For the full year, we made cash contributions to NINA totaling $170 million primarily in the first half of 2010. And finally, we completed share repurchases of 8.5 million shares, totaling $180 million.

Now turning to 2011 guidance on Slide 23. Our EBITDA guidance remains unchanged from our November 24 range of $1.75 billion to $1.95 billion. Included in this guidance range are wholesale expectations of $1.2 billion to $1.3 billion, retail expectations of $480 million to $570 million, and Green Mountain of $70 million to $80 million. As Mauricio discussed earlier, we are about 100% hedged on our baseload generation for 2011 and are thus comfortable with our forecasted results.

As we look forward to our Wholesale business in 2012, we are currently in excess 50% hedged with a higher average price in 2011 as indicated in our SEC filings. Due to this position and based on the current forward curves, we expect flat to marginally lower year-on-year wholesale results in 2012 from 2011. These results will be supplemented with adjusted EBITDA of $85 million from our repowering and solar investments in 2012 that are not subject to market fluctuations.

For our retail business in 2011, our current expectations, assuming normal weather, are an EBITDA range of $480 million to $570 million, the decrease in 2011 guidance compared to current 2010 results is largely explained by lower unit margins in Reliant's Mass business. Reliant's C&I business margins are also expected to decline slightly, but be directly offset by higher terawatt-hours served, reflecting our continued dedication to this growing client base in both Texas and PJM.

Finally, we expect Green Mountain Energy to contribute $70 million to $80 million of EBITDA. We are very excited about enhancing the growth prospects for our Green Energy Retail business during the process of integrating the business with our growing renewables portfolio to enhance these future growth prospects.

During our Q3 earnings call, we discussed the 2011 free cash flow guidance of $425 million to $625 million, and we now currently anticipate free cash flow for 2011 to be in a range of $150 million to $350 million. The difference in guidance is largely explained by certain timing of solar projects, due to Congress extending the availability of cash grants for renewable projects through 2011. NRG postponed its large investments in solar projects from 2010 to 2011, resulting in $267 million of solar expenditures pushed into '11 and relates primarily to our Agua Caliente, Ivanpah and CVSR solar projects.

As we often like to emphasize, we are in a strong cash flow position based on Friday's closing stock price of $20.89 and our affirmed outlook. Free cash flow before growth yield currently stands at between 16% to 20%, or $3.36 to $4.17 per share.

Slide 24 shows the company's projected 2011 year-end cash position which we project to be about $2.5 billion. Beginning with the portion of the Capital Allocation Plan that includes share repurchases and debt repayments in 2011, the company intends to repurchase $180 million of common stock, which is within the constraint of the restricted payments basket; repay $240 million of debt related to our Term Loan B agreement; and approximately $39 million in other facilities. It's important to note that the company made a Term Loan B prepayment in November that totaled $200 million.

And finally, complete $907 million of capital allocation in the following projects: $50 million in NINA; $219 million for other Repowering investments including El Segundo, GenConn Middletown, eVgo, Texas Reliability and Princeton Hospital and $638 million for solar projects, net of cash grant proceeds, and including the $267 million of deferred payments from 2010.

During the third quarter conference call, I also mentioned that we usually maintain a minimum cash balance of $700 million largely for working capital margin requirements, the timing of cash payments, of interests, property taxes, as well as equity for projects we have under construction throughout the year. Thus, for 2011, we estimate a balance of just over $1.8 billion to allocate between perhaps additional share repurchases, contingent on the restricted payments basket expansion, further investments of high-growth opportunities and continued opportunistic management of our debt structure.

On January 11, the company issued $1.2 billion of 7 5/8 senior notes due 2018 and announced the simultaneous cash tender for $1.2 billion of the outstanding 7 1/4 senior notes due 2014. As of January 25, nearly 945 million bonds have tendered, and the remaining 250 million will be redeemed by the end of February pursuant to the embedded coal price. As a result, we've improved our debt maturity profile, all of our public debt matures after 2016, and replace the restricted covenant package with one permitting greater efficiency and flexibility to return value to all NRG stakeholders.

On a go forward basis, we will continue to moderately embed in calls in the 2016 and '17 maturities and be opportunistic about replacing those bonds with less restricted covenant packages, similarly to how we handle the 2014 maturity.

Looking at NRG's combined Repowering and Solar portfolio and our EBITDA contribution on Slide 25, you can clearly see the benefit of the program with nearly $550 million of recurring contribution by 2015.

During the fourth quarter, our El Segundo Repowering project received prior approval from the California Public Utilities Commission for a ten-year Power Purchase Agreement with Southern California Edison. Commercial operation's expected in the summer of 2013.

Our large utility-scale solar projects will also begin to reach commercial operations between the summer of '13 and the first quarter of 2014, and these projects collectively are driving this EBITDA growth. These solar investments are attractive for their high-teens returns, very low construction risks and offtake agreement of 20-plus years with highly rated counterparties. We will continue to provide updates on the progress of these projects as they move into construction and operation.

As we continue to invest and grow our solar portfolio, it's important to highlight a few economic benefits created with these projects. Slide 26 shows how the combination of cash grant, maker's depreciation and strong cash flows from the PPAs for our projects result in a payback for our investments, in some cases by 2014, and retain stable cash flows for the remaining term of the PPAs.

Though we believe there will be a turnaround in commodity markets, we are mindful of our ability to create enough taxable income for us to fully absorb tax benefits created by these solar investments. There is clearly a limit to how much tax efficiency we could absorb in any one year before reducing the total project returns. As such, to both minimize the tax leakage and enhance our returns, in 2011, we will pursue new equity investors for our solar portfolio, who have both the appetite for tax benefits and seek investment to one of the largest utility-scale solar portfolios in the world. New equity investors would not only help to optimize our existing tax position but allow us to continue to invest in future projects with high returns.

We expect to launch this initiative soon and look forward to sharing the progress in the future. Now I'll pass it back to David for final comments.

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

Thank you, Chris, and thank you, Mauricio. And so in conclusion, on Slide 28, we put what we think are some of the value drivers around the investment proposition at NRG. And it starts with the fact that 2 1/2 years into the commodity price down cycle, it appears to us that the end is in sight, the bottom of the trough has been reached, and the only way to go is up. When or how quickly gas prices will recover remains open to conjecture, but the case for rising heat rates in our core market of Texas is clear and compelling. And we've positioned our portfolio and our hedge both to benefit from that upturn.

Second, even in a political environment that has turned more conservative in the past year, market mandates for renewable generation and for solar power in particular, remain well supported in both the red and blue states. And the result for us has been a fast-growing portfolio of projects that will contribute substantially to shareholder value creation over the short to medium-term.

Finally, there's the inherent value unique amongst our peer group of Wholesale generation combined with the leading retail position. While we have executed to such great success in Texas, together with Reliant, we are now in position to replicate with Green Mountain in the fast-growing green and retail energy sector. It's a bright future indeed, and for all of us at NRG, we'll strive to realize its vantage on behalf of the shareholders of NRG.

So Deanna, with that, we'd be happy to take some questions.

Question-and-Answer Session

Operator

[Operator Instructions] The first question will come from the line of Daniel Eggers, Crédit Suisse.

Dan Eggers - Crédit Suisse AG

David, I was just trying to marry up some of the comments made about some of the solar investment opportunities. If I look at Slides 25 and 26, the cash investment and then the earnings contribution you guys show there, is that based on the things that are in hand right now, or is there a assumption of the amount of incremental projects who would have to get signed this year to help get to those numbers?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

I think what we're showing, Chris, correct me if I'm wrong, is the Tier 1, which are projects, which in my personal estimation are ones that have a 90-plus percent chance of achieving financial closure.

Christian Schade - Chief Financial Officer and Executive Vice President

Yes, that's actually correct, Dan.

Dan Eggers - Crédit Suisse AG

So these are things that are already in place, and this would be less contribution than what you said in your comments earlier, David, about having equity investment and solar greater than what you do see in South Texas ultimately?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

I'm sorry. Say it again?

Dan Eggers - Crédit Suisse AG

So this earnings contribution represents an investment less than what you think you can get to from the solar perspective based on your comments earlier in the presentation?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

I mean there are more projects behind this portfolio.

Dan Eggers - Crédit Suisse AG

When do you see the opportunity this year to announce off projects? And how would you see this sell down equity go as far as changing the earnings contribution profile from these projects? And how much could you sell down, do you think?

Christian Schade - Chief Financial Officer and Executive Vice President

Well, we're going to get to how much we can sell down as we move through the process. But very clearly, any amount we sell down will sort of be a pro rata reduction in EBITDA. And so depending on how much we do, we'll certainly let you know. But we do believe that the sell down will allow us to provide incremental more equity into other projects we have yet to announce. But what David said, we're on the bubble given the benefits from the government largesse, which we think still exist but perhaps will run out in the next couple years. And those projects will also be assumed as sort of returns consistent with what we've seen to date.

Dan Eggers - Crédit Suisse AG

And I guess one last question just on South Texas. David, if you could maybe just -- we go through the numbers as far as how much cash you expect to throw off in the project, and then to clarify that, contribution's based on kind of the pricing you'd need it to be able to receive in order to earn economic return on that project?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

Well, so you're saying you're -- Dan, you're actually looking forward to 2016 and '17? Yes, I mean, looking at Page 10, I mean, through the first few years, when we've talked about receiving $500 million of cash, that's based on our view on where gas prices go, which is, obviously, some way up from where they are now, sort of into the $6 to $7 range. Having said that, Dan, we've stressed the returns on the nuclear project from an IRR perspective, sort of $4 gas in perpetuity model. And the IRR in the project, it would still be in double digits, but obviously, the higher gas prices, the better we do. But it works, the numbers work even at a $4 gas environment. And the reason that is the case, Dan, is because, obviously, the tax benefits associated with nuclear project, particularly, the production tax credits, meaning that through the first several years of the nuclear project, the economics are more driven actually by the tax benefits than they are by the price of electricity.

Dan Eggers - Crédit Suisse AG

Do you see IRR as working in $4 gas to the equivalent of a mid-30s power price, you would see the plant being economic?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

In a $4 gas, the plant is, yes. I mean, again, it's a low-teen return. I'm not sure that -- it's not the return we're seeking, but it's not a single digit return or a negative return.

Operator

The next question will come from the line of Ameet Thakkar, Bank of America Merrill Lynch.

Ameet Thakkar - BofA Merrill Lynch

Mauricio, you kind of indicated that the path with hedging, despite, I guess, some uptick in heat rates in Texas and you also didn't do much in the way of coal as well. I mean is your expectation that PRB prices should follow gas down? Or are you guys a little bit more neutral on gas at this point?

Mauricio Gutierrez - Chief Operating Officer and Executive Vice President

Well, I mean, if you look at our hedge profile, the next few years, we're pretty well hedged on both sides, so power and coal. We can justify the contango that exists with the coal curve. And given the inventory that we have and the hedge profile, we think that we can weigh to be more opportunistic about when to catch the coal prices. With respect to gas, we continue to see further declines in the front part of the curve, which we've been pretty well insulated. But as I mentioned in my remarks, I mean, I think when you look at 2012 and beyond, and where those price levels are, we see very little downside risk from that. And we think that there are several factors that are converging that could potentially move gas prices, assuming they could be higher than where they are today.

Ameet Thakkar - BofA Merrill Lynch

And then David, real quick on STP. I just want to make sure I understood, I guess, some of your answers to the previous questions. You see returns in kind of the teens area, given the $4 gas for STP?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

Yes, so the returns would be in the teens area in the $4, in perpetuity model. Again, this is based on the idea that we're running a model where there's roughly 1,000 megawatts of power sold by long-term contract, and the rest is taken into the merchant market. So the $4 gas would apply to the 2,000 in the merchant market. And yes, you're right, what it shows is a return in the teens, in that sensitivity. I would also tell you, Ameet, both in response to your question and I should say to Dan, also, we run this with no value associated to the zero-carbon aspect of it, so the price on carbon directly or indirectly would be on top of this.

Ameet Thakkar - BofA Merrill Lynch

And then so is like the 1,000 megawatts of PPA cover, I guess, under that analysis, is that really kind of the goal to kind of continue to move forward and not exit, I guess, exit land for on Slide 9?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

Well, Ameet, almost as a -- I mean, from the beginning, I think that we have said to our investor base that we, at least, would not proceed with the project unless there was a significant amount of long-term offtake associated with the project. And so, roughly 1,000 megawatts has been something we talked about from the beginning. On top of that, Ameet, the conditional loan guarantee, if and when it's announced, it's called a conditional loan guarantee because there are conditions associated with it. And probably the most substantive condition, the condition we would be focused on is that the government would require us to have approximately that same amount of long-term offtake agreement contracted, which was a condition, again that we were happy to agree with the government on since we had said that we wouldn't go forward with it either. So that's why we would be doing that.

Operator

And the next question will come from the line of Ted Durbin, Goldman Sachs.

Theodore Durbin - Goldman Sachs Group Inc.

If I could just ask a little bit about the capital allocation. You're obviously coming out of 2010 here with a high cash balance. I'm just trying to understand a little bit better the allocation of the capital towards the renewables and whatnot, maybe extending that relative to between cash to stakeholders. Could you just talk a little bit more about that?

Christian Schade - Chief Financial Officer and Executive Vice President

As we said, we're committing to a $180 million stock repurchase, and that's within the confines of our restrictive payment basket. We're also going to be making required debt repayments under our term loan program, Term Loan B program. We've also earmarked potential investment in our solar projects, and these are projects which we had -- some of which we're announced late last year and early this year and would be subject to the cash grant program under the government. So all of those projects and repowering projects from El Segundo and GenConn Middletown. But those are the programs at least that were part of the capital allocation program for this year. That's what we've announced. We have $1.8 billion after which we would be able to deploy into additional repowering should they be available and new solar projects that we see on the horizon, as I've said before, all of which offer us the opportunity for very attractive returns.

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

And just to add, Ted, I think you phrased the question almost as if it was an either/or, and I guess that may be a little different. I mean, given the company's free cash flow generation and the cash we have on hand, we haven't really seen it as an either/or. In terms of returning capital to shareholders through the share buyback, we do as much as we can under the restrictive payment basket. Over the past years, we've constantly evaluated whether or not we could negotiate a way to have more room to do more, but the expense of doing that has always made that impractical. So from our perspective, it has not been an either/or decision. It's been do both.

Theodore Durbin - Goldman Sachs Group Inc.

Does that cost of getting the ability to do more of a buyback, you're still seeing that as not worth the expense of getting that?

Christian Schade - Chief Financial Officer and Executive Vice President

That's right. We think the expense to negotiate with the bondholders is being punitive. And as I said in the prepared remarks, the approach that we took on the 2014 maturity to wait for the calls to come due than to call away and refinance was we felt unattractive and a cost-beneficial way to do it. We have calls coming up in February for the 2016 maturity which we'll keep an eye on. The 2017 are not yet callable, will be so within a year. The high-yield market remains very attractive from financing perspectives, so we'll continue to look at that closely. But just to further what David said, with the excess cash in addition to the $180 million as we said, we'll certainly consider future stock repurchases if it can fall within the confines of hedging expansion we see in our restrictive payments basket throughout the year as well.

Theodore Durbin - Goldman Sachs Group Inc.

I appreciate the commentary on sort of the assets side. It sounds like you're not seeing the values on the CCGT side that you were before, but you did do the Cottonwood transaction. Are there other holes in your portfolio, where you say, "Geez, we'd really like to add some mid-merit assets whether it's more in South Central or whatnot?" And kind of talk about where you'd like to build up the portfolio.

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

Well, I think the place where we'd like to build up the portfolio, and again, we've been fairly -- well, it took us six years to execute on the idea that we needed a load following plant in South Central. So just because I say this, I don't want you to think any sort of announcement's around the corner, because I'm actually skeptical that we can achieve anything. But we would definitely like to have some more baseload-following capability in PJM, particularly Eastern PJM. Having said that, we don't have any optimism about anything coming available in that footprint that we would find probably at a reasonable price. But we keep our ear to the ground. I would say that has been our single greatest priority second to backing up Big Cajun, which we've now achieved with Cotton.

Operator

And the next question will come from the line of Jonathan Arnold, Deutsche Bank.

Jonathan Arnold - Deutsche Bank AG

My question is, on STP, you believe the option for the second 10%, the TEPCO would take -- had a May expiration date on it, we recall from the original 8-K. But is there a similar date around the base 10% investment that's contingent on the loan guarantee acceptance? Is May a kind of drop-dead date for that whole arrangement with TEPCO?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

I don't believe there's a drop-dead date. And John, Tokyo Electric well understands the pace of development. I don't want to speak to them, but I think their enthusiasm for participating in this project is unchanged from when we announced the deal a year ago. So I don't remember any sense of date, but I have a very high level of confidence that if the loan guarantee comes that Tokyo Electric will participate in the project.

Jonathan Arnold - Deutsche Bank AG

And can you also give us a sense of -- well, obviously, your contribution is relatively small over this '11, '12 period. What would the $25 million in '12 be absent additional sell downs? And maybe some kind of sense of how much is actually being spent on the project itself during this next couple of years.

Christian Schade - Chief Financial Officer and Executive Vice President

Well, what it would be without the sell down, I'll have to get back to you on that. The amount of money that has to be invested towards in order for us to proceed is it's several hundred million dollars. But Jonathan, it's really hard to put it in those terms. Because like a good portion of it is long lead time materials in Japan which are actually funded with the credit facility from Toshiba. So maybe we can break out and provide it to you or do it next quarter. Just the development spend for now, in order for us to proceed against the sources of capital, because it's really not useful if you look at it as one-lump sum, because various things are paid for with different buckets of money.

Jonathan Arnold - Deutsche Bank AG

And if I may just on one other topic, what indications are you getting from DOE on these discussions at a level of hedging through PPAs that would be acceptable to them on the project?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

Well, I think that the condition is very specific. And I think back, it's the same as I answered to Ameet. It's something just less than 1,000 megawatts.

Operator

The next question will come from the line of Jay Dobson, Wunderlich Securities.

James Dobson - Wunderlich Securities Inc.

I was hoping you could give us some insight into the offtake discussions. The local media's covered some interesting transactions, or at least, proposals that you had. So I'm just wondering if you can give us some insight into where things stand and sort of what your level of optimism is currently.

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

It's a good question, and I think what I would say without -- I mean, it's difficult to comment with discussions that are underway. And in fact, normally, we don't comment on it but since as you said, there's been discussions by the public, I guess I should say some things. I would say, first of all, I think there's an openness, a willingness, and interest on several load-serving entities, large load-serving entities in the Texas market to talk about long-term offtake. And I would also say that the events of early February in Texas, where a part of the reason the state had rolling brownouts or even blackouts is because people couldn't get gas to some power plants, I think has reinforced the idea that having fuel diversity in the state is something that load-serving entities want to have. So there's a fairly high level of interest from various parties, but the big qualifier I always put on this question is, right now, as you say, it's really discussions. I mean, the project isn't really real to off-takers until we have a loan guarantee. So I would describe anything that we're doing with any counterparty at this point is being preliminary. And so that's what I would tell you. And based on what we're being told by the camp, their interest level, I'm guardedly optimistic. But mainly, my main attitude towards all this is, let's wait and see what happens when the loan guarantee's announced, because that's when ourselves and our counterparties are going to have to get down to business, and people are going to have to make commitments on both sides. So that's the main thing, and what we're trying to empathize here is that, that phase, and hopefully that phase will begin within the coming weeks, is something that basically needs to be resolved by the summer so that we can all have clarity as within the company and U.S. investors and analysts as to where we stand vis-à-vis this project.

James Dobson - Wunderlich Securities Inc.

As an unrelated follow-up, on the solar side, I'm not sure if this is good for your or for Chris. I assume in addition to selling an equity stake, you'd consider selling a tax equity there, and how do you consider those two alternatives?

Christian Schade - Chief Financial Officer and Executive Vice President

Yes, very much so. I think the equity stake that we are contemplating is tax equity, it's a structuring issue. But we're certainly looking to pass off the tax attributes that are generated from this portfolio to tax equity investors. I think, one thing as a follow-up to a question before is that we'd certainly be looking to sell this equity at a premium. The returns that we're seeing perhaps from these investors are below the expected returns that we see in the high-teens, and so that sort of premium or IRR arbitrage gain will certainly benefit us in having development premium for this. But our goal here both is to bring equity into these projects and also, to lay off some of the tax that perhaps, does not necessarily accrue to NRG.

James Dobson - Wunderlich Securities Inc.

And Chris just a last follow-up, the capacity of the RP basket at year end?

Christian Schade - Chief Financial Officer and Executive Vice President

It was about $160 million. So the $180 million that we announced today will be spread out for a couple of quarters.

Operator

The next question will come from the line of Brandon Blossman, Tudor, Pickering Holt & Co.

Brandon Blossman - Tudor, Pickering, Holt & Co. Securities, Inc.

I guess just a follow-up on the tax equity question, probably for Chris. Just to be clear, is the tax equity partner or sell down required to optimize the tax benefits of the current solar portfolio, or is that something you need to do to increase the size of that portfolio?

Christian Schade - Chief Financial Officer and Executive Vice President

I think it's not necessarily required. I think it benefits the returns of the portfolio and allows us to continue to invest in the space. As David said, we're seeing a lot of opportunities elsewhere, and I think when we start to layer on other utility-sized projects in addition to what we have, there is a limit to the capacity of tax attributes that we can assume. So we think it's important. We're seeing a lot of interest and opportunities to invest in this space by sort of nontraditional investors who want to get green, and so we think it's a big opportunity for us, who are certain taxpayers as well. So it's for us to check a lot of boxes along the way. First and foremost to optimize our tax position in appropriate years, as well as to allow us to continue to invest in the space.

Brandon Blossman - Tudor, Pickering, Holt & Co. Securities, Inc.

And how does that dovetail with STP's tax attributes? Is that far enough out so that there's no overlap here or concerns about maximizing that value?

Christian Schade - Chief Financial Officer and Executive Vice President

It is far enough out that we're not perspiring about the tax attributes that it generates. But certainly, it's a topic that we will address at due time. And also, would speak to our underlying business that we hope and certainly think will grow enough to burn through these NOLs and to continue to generate the taxable asset side in those years. So we're confident of that.

Brandon Blossman - Tudor, Pickering, Holt & Co. Securities, Inc.

And David, as a follow up, not that anyone wants this to happen, but if there is an exit ramp for STP, can you describe what that looks like? Is there a project to be had at some point in the future, given that this is a particularly attractive development project?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

Well, Brandon, I guess, what I would say, on a few fronts. I mean it sort of depends on which exit ramp you're talking about. And I'm just speculating on things which of course, we don't hope to happen. I mean from my perspective, I think if something happens during this year that caused the entire project to go away, we would probably finish the licensing process, which is a small fraction of the overall development spend. But we're so far along with the NRC that to stop it this close to the end would not make sense. But beyond that, would the project go forward? I think it depends on which exit ramp it is. And again, I don't mean to speak for the other partners, because I want to emphasize every NRG investor on the call. We do not have the right to kill the STP 3 & 4 project. We just have the right to stop our own financial contribution to it. But I would say, if the exit ramp is that, actually it turns out that there is no loan guarantee in the offing -- I haven't actually asked this question directly, but I think our partners in Japan -- and we would be aligned that there would be, that the project would stop if there's no hope of a federal loan guarantee. If on the other hand, there was a federal loan guarantee, but we were taking the exit ramp because we were unable to lineup the offtake, I don't know what our partners would do in that circumstance. Maybe they would continue with the project, that would be their prerogative to do. I just know that if we don't have that offtake arrangement, then we will stop funding.

Brandon Blossman - Tudor, Pickering, Holt & Co. Securities, Inc.

And that would be not the 1,000 megawatts, but isn't that predicated on the loan guarantee or the loan guarantee predicated on the 1,000 megawatts?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

It is, but one of the reasons why I don't know -- I don't remember the exact terms, the exact words of the conditional loan guarantee, but I know that we do not have the opportunity at NRG to solve for the offtake arrangement, because I think the condition is offtake agreements with investment grade offtakers. Our Japanese partners who are investment grade would have that opportunity should they so choose to correct that on their own. We don't have that type of power, so that's not a question for us.

Operator

The next question will come from the line of Brian Chin, Citigroup.

Brian Chin - Citigroup Inc

What's the rough range of construction cost estimates in dollar per KW for the solar PV facilities that you are seeing, and also for the solar thermal side?

Christian Schade - Chief Financial Officer and Executive Vice President

The range, well, I think we would say that the range right now is 3,500 to 4,000 per KW, and I don't know, that would be for the PV -- I can't tell you -- the solar thermal would probably be in the same range.

Brian Chin - Citigroup Inc

And then would it be fair to say that $4 sustaining perpetual natural gas price environment that you'd still see solar generating returns in the double digits as well? And is it higher or lower than nuclear?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

Well, we haven't compared them side-by-side. I think it's fair to say that like nuclear, the solar projects, at this point, the economics are very heavily driven by the tax benefits. But beyond that, the real difference between the two is that every solar project we're doing is completely not merchant. It's totally PPA. So I don't think -- in fact, when we talk about taking the company's financial performance and sort of de-linking it to natural gas prices, we put renewables together with retail in parts of our EBITDA stream that are not associated with natural gas prices, because of the fact that all of the economics are derived from long-term PPAs.

Brian Chin - Citigroup Inc

Can you talk just a little bit about from your perspective, what the FERC's order in the New York ISO and the capacity market situation up there? What's changed longer-term, and how much of a positive is that for you guys, or is that even material?

Mauricio Gutierrez - Chief Operating Officer and Executive Vice President

Well, I mean it's definitely material. It's difficult to say what is the ultimate impact, because I think the variables are still being flushed out. But the three main changes was the recognition of state taxes and the cost of new entry calculation, inter-connection costs and then the energy offsets. So when you put those three together, you basically have higher cost of new entry, which will push capacity prices for both New York City and the whole state. This will benefit our New York portfolio, but at this point I can't give you the specific mind into it.

Operator

And the next question will come from the line of Anthony Crowdell, Jefferies.

Anthony Crowdell - Jefferies & Co

Just a quick question on the, I guess, the cold stub that hit Texas earlier this month. And it seem like there wasn't much of an impact on the generation side, but was there any impact to the margins that Reliant expected or anything on the quarter?

Jason Few - SVP of Mass Markets and Operations, Reliant Energy, Inc.

This is Jason. From the retail side, we actually, faired fairly well through this event. I mean, our hedging strategy and risk policies served as well during the event. We did not see material impact to our business.

Operator

In interest of time, we have time for two more callers. And the next question will come from the line of Charles Fishman, Pritchard Capital Partners.

Charles Fishman - Pritchard Capital Partners, LLC

Your five-year environmental capital plan, Page 17, I want to make sure I understand this. The $720 million includes your view of what the math might be, which is less than worst-case, number one. And number two is there are no dollars in the $720 million to address once thru cooling. Is that correct?

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

No, actually, there is some dollars for 316(b) through the installation of extremes. We've been very successful in New York, in Arthur Kill and Huntley and Dunkirk to address this issue. So while it addresses the Mercury and asymmetric controls across all our coal assets, it also addresses the 316(b).

Charles Fishman - Pritchard Capital Partners, LLC

And if we do end up with the worst case math, I mean could this number increase 50%? Or do you have any feel for that?

Mauricio Gutierrez - Chief Operating Officer and Executive Vice President

Well, we actually disclosed that on our last earnings call. And I believe it's about $1 billion -- just shy of $1 billion. If it was the worst case scenario, in terms of unit-specific controls, no averaging. And we just don't believe the EPA will go that route. But the rule is going to come out, the proposal is going to come out in about a month, and I think it's just prudent to wait before we make any changes.

Operator

And there are no more questions in queue at this time.

David Crane - Chief Executive Officer, President, Executive Director and Member of Nuclear Oversight Committee

Okay, well, good. Well, thank you all very much, and we look forward to talking to you in the next quarter. Thank you, operator.

Operator

And ladies and gentlemen, this concludes today's presentation. Thank you very much for your participation. You may now disconnect, and have a great day.

EXHIBIT 5

Attention Deficit Hyperactivity Disorder and Dirty Electricity

To the Editor:

In February 2010, while studying a cancer cluster in teachers at a California elementary school, a fourth-grade teacher complained that her students were hyperactive and unteachable. The classroom levels of high-frequency voltage transients (dirty electricity) in the radio frequencies (RF) between 4 and 100 kHz measured in the outlets of her classroom with a Graham/Stetzer Microsurge meter were very high. Dirty electricity is a term coined by the electrical utilities to describe electrical pollution contaminating the 60 Hz electricity on the electrical grid. A cell phone tower on campus a few feet from this classroom and unshielded fluorescent lights both contributed to the electrical pollution in this room. Cell tower transmitters, like most modern electrical equipment, operate on direct current. The electrical current brought to the tower is alternating current that needs to be changed to direct current. This is done by a switching power supply. These devices interrupt the alternating current and are the likely major source of the dirty electricity in the classroom.

On a Friday afternoon after school, I filtered the 5 outlets in this room with Graham/Stetzer plug-in capacitive filters, reducing the measured dirty electricity in the room wiring from more than 5000 Graham/Stetzer units to less than 50 units. With no change in either the lighting or the cell tower radiation, the teacher reported an immediate dramatic improvement in the behavior of her students in the following week. They were calmer, paid more attention, and were teachable all week except for Wednesday when they spent part of the day in the library.

In his 1973 book, Health and Light,[1] John N. Ott described a 1973 study of 4 first-grade classrooms in a windowless Sarasota, Florida school. Two of the rooms had standard white fluorescent lighting and the other two had full-spectrum fluorescent lighting with a grounded aluminum wire screen to remove the RF radiation produced by fluorescent bulbs and ballasts. Concealed time-lapse cameras recorded student behavior in classrooms for 4 months.[2] In the unshielded rooms, the first graders developed, "… nervous fatigue, irritability, lapses of attention, and hyperactive behavior." "… students could be observed fidgeting to an extreme degree, leaping from their seats, flailing their arms, and paying little attention to their teachers." In the RF-shielded rooms, "Behavior was entirely different. Youngsters were calmer and far more interested in their work."

The Old Order Amish live without electricity. A pediatric group practice in Jasper, Indiana, which cares for more than 800 Amish families has not diagnosed a single child with attention deficit hyperactivity disorder (ADHD).[3] Dozens of cases of childhood ADHD have been "cured" with no further need for drugs by simply changing their electrical environments (Stetzer D, personal communication [www.Stetzerelectric.com]). AQ:A

Before children are treated with drugs for ADHD, the dirty electricity levels in their homes and school environments should first be examined and reduced if needed.

I present the epidemiologic evidence linking dirty electricity to the other diseases of civilization in a recent book.[4,5] AQ:B

Disclosure: The authors declare no conflict of interest. AQ:C

Samuel Milham, MD, MPH AQ:D
Washington State Health Department
Tumwater, WA

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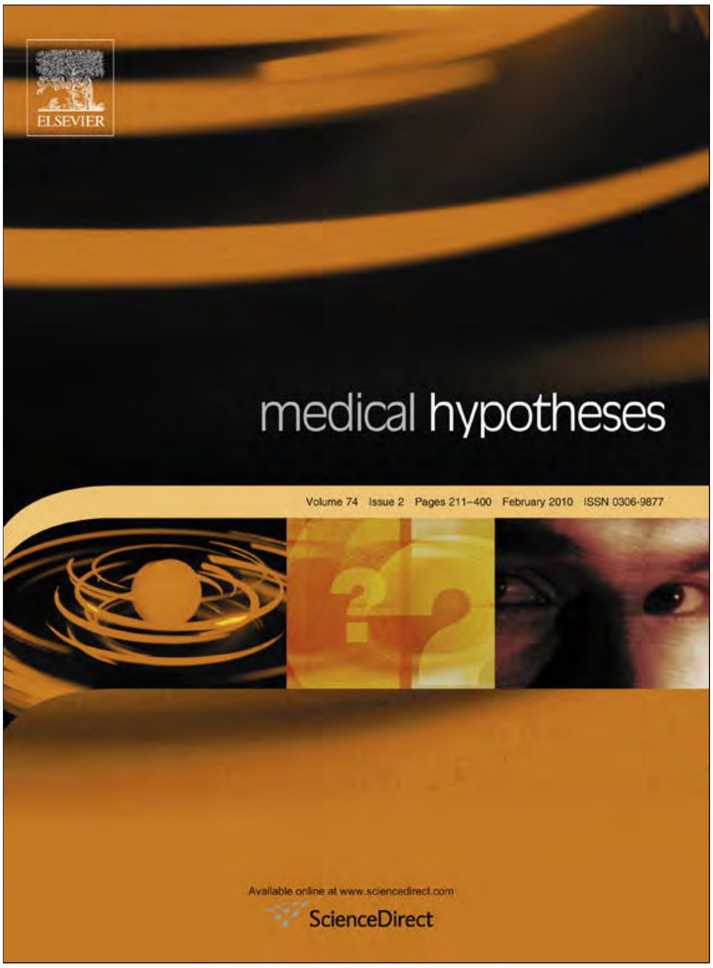
EXHIBIT 6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Historical evidence that electrification caused the 20th century epidemic of "diseases of civilization" ☆

Samuel Milham *

Washington State Department of Health, Olympia, WA, USA

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SUMMARY

The slow spread of residential electrification in the US in the first half of the 20th century from urban to rural areas resulted by 1940 in two large populations; urban populations, with nearly complete electrification and rural populations exposed to varying levels of electrification depending on the progress of electrification in their state. It took until 1956 for US farms to reach urban and rural non-farm electrification levels. Both populations were covered by the US vital registration system. US vital statistics tabulations and census records for 1920–1960, and historical US vital statistics documents were examined. Residential electrification data was available in the US census of population for 1930, 1940 and 1950. Crude urban and rural death rates were calculated, and death rates by state were correlated with electrification rates by state for urban and rural areas for 1940 white resident deaths. Urban death rates were much higher than rural rates for cardiovascular diseases, malignant diseases, diabetes and suicide in 1940. Rural death rates were significantly correlated with level of residential electric service by state for most causes examined. I hypothesize that the 20th century epidemic of the so called diseases of civilization including cardiovascular disease, cancer and diabetes and suicide was caused by electrification not by lifestyle. A large proportion of these diseases may therefore be preventable.

Background

In 2001, Ossiander and I [1] presented evidence that the childhood leukemia mortality peak at ages 2–4 which emerged in the US in the 1930s was correlated with the spread of residential electrification in the first half of the 20th century in the US. While doing the childhood leukemia study, I noticed a strong positive correlation between level of residential electrification and the death rate by state due to some adult cancers in 1930 and 1940 vital statistics. At the time, a plausible electrical exposure agent and a method for its delivery within residences was lacking. However, in 2008 I coauthored a study of a cancer cluster in school teachers at a California middle school [2] which indicated that high frequency voltage transients (also known as dirty electricity), were a potent universal carcinogen with cancer risks over 10.0 and significant dose–response for a number of cancers. They have frequencies between 2 and 100 kHz. These findings are supported by a large cancer incidence study in 200,000 California school employees which showed that the same cancers and others were in excess in California teachers statewide [3]. Power frequency magnetic fields (60 Hz) measured at the school were low and not related to cancer incidence, while classroom levels of high frequency voltage transients measured at the electrical outlets in the classrooms accurately predicted a teacher's cancer risk. These fields are potentially present in all wires carrying electricity and are an important component of ground currents returning to substations especially in rural areas. This helped explain the fact that professional and office workers, like the school teachers, have high cancer incidence rates. It also explained why indoor workers had higher malignant melanoma rates, why melanoma occurred on part of the body which never are exposed to sunlight, and why melanoma rates are increasing while the amount of sunshine reaching earth is stable or decreasing due to air pollution. A number of very different types of cancer had elevated risk in the La Quinta school study, in the California school employees study, and in other teacher studies. The only other carcinogenic agent which acts like this is ionizing radiation.

Among the many devices which generate the dirty electricity are compact fluorescent light bulbs, halogen lamps, wireless routers, dimmer switches, and other devices using switching power supplies. Any device which interrupts current flow generates dirty electricity. Arcing, sparking and bad electrical connections can also generate the high frequency voltage transients. Except for the dimmer switches, most of these devices did not exist in the first half of the 20th century. However, early electric generating equipment

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* Address: 2318 Gravelly Beach Loop NW, Olympia, WA 98502-8837, USA. Tel.: +1 360 866 0256.

E-mail address: smilham2@comcast.net

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and electric motors used commutators, carbon brushes, and split rings, which would inject high frequency voltage transients into the 60 Hz electricity being generated and distributed.

With a newly recognized electrical exposure agent and a means for its delivery, I decided to examine whether residential electrification in the US in the first half of the last century was related to any other causes of death. Most cancers showed increasing mortality in this period, and many are still increasing in incidence in the developed world.

Thomas Edison began electrifying New York City in 1880, but by 1920, only 34.7% of all US dwelling units and 1.6% of farms had electric service (Table 1). By 1940, 78% of all dwelling units and 32% of farms had electric service [4]. This means that in 1940 about three quarters of the US population lived in electrified residences and one quarter did not. By 1940, the US vital registration system was essentially complete, in that all the 48 contiguous United States were included. Most large US cities were electrified by the turn of the century, and by 1940, over 90% of all the residences in the northeastern states and California were electrified. In 1940 almost all urban residents in the US were exposed to electromagnetic fields (EMFs) in their residences and at work, while rural residents were exposed to varying levels of EMFs, depending on the progress of rural electrification in their states. In 1940, only 28% of residences in Mississippi were electrified, and five other southern states had less than 50% of residences electrified (Table 2). Eleven states, mostly in the northeast had residential electrification rates above 90%. In the highly electrified northeastern states and in California, urban and rural residents could have similar levels of EMF exposure, while in states with low levels of residential electrification, there were potentially great differences in EMF exposure between urban and rural residents. It took the first half of the 20th century for these differences to disappear. I examined US mortality records by urban and rural residence by percent of residences with electric service by state.

Hypothesis

The diseases of civilization or lifestyle diseases include cardiovascular disease, cancer and diabetes and are thought to be caused by changes in diet, exercise habits, and lifestyle which occur as countries industrialize. I think the critical variable which causes the radical changes in mortality accompanying industrialization is electrification. Beginning in 1979, with the work of Wertheimer and Leeper [5], there has been increasing evidence that some facet of electromagnetic field exposure is associated epidemiologically with an increased incidence of leukemia, certain other cancers and non-cancers like Alzheimer's disease, amyotrophic lateral sclerosis, and suicide. With the exception of a small part of the electromagnetic spectrum from infra red through visible light, ultraviolet light and cosmic rays, the rest of the spectrum is man-made and foreign to human evolutionary experience. I suggest that from the time that Thomas Edison started his direct current electrical distribution system in the 1880s in New York City until now, when most of the world is electrified, the electricity carried high frequency voltage transients which caused and continue to cause what are considered to be the normal diseases of civilization. Even today, many of these diseases are absent or have very low incidence in places without electricity.

Table 1
Growth of residential electric service US 1920–1956 percent of dwelling units with electric service.

Year	All		Urban and rural non-farm
	Dwellings	Farm	
1920	34.7	1.6	47.4
1925	53.2	3.9	69.4
1930	68.2	10.4	84.8
1935	68.0	12.6	83.9
1940	78.7	32.6	90.8
1945	85.0	48.0	93.0
1950	94.0	77.7	96.6
1956	98.8	95.9	99.2

Table 2
Percent of residences with electric lighting 1930 and 1940 by state.

Code	State	1930	1940
AL	Alabama	33.9	43.3
AZ	Arizona	68.8	70.5
AR	Arkansas	25.3	32.8
CA	California	93.9	96
CO	Colorado	69.6	77.6
CT	Connecticut	95.3	96.5
DE	Delaware	78.4	81.8
FL	Florida	60.9	66.5
GA	Georgia	35.5	46.6
ID	Idaho	64.5	79.1
IL	Illinois	86.1	89.9
IN	Indiana	74.8	84
IA	Iowa	65.6	76.7
KS	Kansas	62	71.5
KY	Kentucky	44.2	54.2
LA	Louisiana	42.2	48.9
ME	Maine	76.1	80.4
MD	Maryland	81.8	85.9
MA	Massachusetts	97.1	97.6
MI	Michigan	84.8	92.1
MN	Minnesota	65.9	75.8
MS	Mississippi	19.4	28.3
MO	Missouri	65.5	70.6
MT	Montana	58.2	70.7
NE	Nebraska	61	70.5
NV	Nevada	76.2	80.8
NH	New Hampshire	84.9	87
NJ	New Jersey	95.8	96.6
NM	New Mexico	39.8	49.2
NY	New York	94.5	96.4
NC	North Carolina	40.8	54.4
ND	North Dakota	41.6	53.8
OH	Ohio	85.2	90.6
OK	Oklahoma	45.3	55.1
OR	Oregon	79.5	85.8
PA	Pennsylvania	89.5	92.3
RI	Rhode Island	97.3	97.7
SC	South Carolina	34.3	46.2
SD	South Dakota	44.4	56.6
TN	Tennessee	42	50.9
TX	Texas	*	59
UT	Utah	88.4	93.9
T	Vermont	71.9	80.2
VA	Virginia	50.5	60.6
WA	Washington	86.3	90.9
WV	West Virginia	63.4	69.1
WI	Wisconsin	74.5	83.9
WY	Wyoming	60	70.9

*No data.

Evaluation of the hypothesis

To evaluate the hypothesis, I examined mortality in US populations with and without residential electrification. Vital statistics tabulations of deaths [6], US census records for 1920–1970 [7], and historical US documents [8,9] were examined in hard copy or downloaded from the internet. The same state residential electrification data used in the childhood leukemia study [1] was used in this study. Crude death rates were calculated by dividing number of deaths by population at risk, and death rates by state were then correlated with electrification rates by state using downloaded software [10]. Time trends of death rates for selected causes of death by state were examined. Most rates were calculated by state for urban and rural residence for whites only in 1940 deaths, since complete racial data was available by urban/rural residence by state for only 13 of 48 states. Data was available for 48 states in the 1940 mortality tabulations. District of Columbia was excluded because it was primarily an urban population. Excel graphing software [11] and "Create a Graph" [12] software was used.

I had hoped to further test this hypothesis by studying mortality in individual US farms with and without electrification, when the 1930 US census 70 year quarantine expired in 2000. Unfortunately, the 1930 US farm census schedules had been destroyed.

Findings

Rural residential electrification did not reach urban levels until 1956 (Table 1). Table 2 shows the level of residential electrification for each state for 1930 and 1940. In 1930 and 1940 only 9.5% and 13%, respectively, of all generated electricity was used in residences. Most electricity was used in commercial and industrial applications.

Figs. 1–4 were copied and scanned from "Vital statistics rates in the United States 1940–1960", by Robert Grove Ph.D. and Alice M. Henzel. This volume was published in 1968. Fig. 1 shows a gradual decline in the all causes death rate from 1900 to 1960 except for a spike caused by the 1918 influenza pandemic. Death rates due to tuberculosis, typhoid fever, diphtheria, dysentery, influenza and pneumonia and measles all fell sharply in this period, and account for most of the decline in the all causes death rate. Figs. 2–4 show that in the same time period when the all causes death rate was declining, all malignant neoplasms (Fig. 2), cardiovascular diseases (Fig. 3), and diabetes (Fig. 4) all had gradually increasing death rates. In 1900, heart disease and cancer were 4th and 8th in a list of 10 leading causes of death. By 1940 heart disease had risen to first and cancer to second place, and have maintained that position ever since. Table 3 shows that for all major causes of death examined, except motor vehicle accidents, there was a sizable urban excess in 1940 deaths. The authors of the extensive 69 page introduction to the 1930 mortality statistics volume noted that the cancer rates for cities were 58.2% higher than those for rural areas. They speculated that some of this excess might have been due to rural residents dying in urban hospitals. In 1940, deaths by place of residence and occurrence are presented in separate volumes. In 1940 only 2.1% of all deaths occurred to residents of one state dying in another state. Most non-resident deaths were residents of other areas of the same state. Table 4 presents correlation coefficients for the relationship between death rates by urban rural areas of each state and the percent of residences in each state with

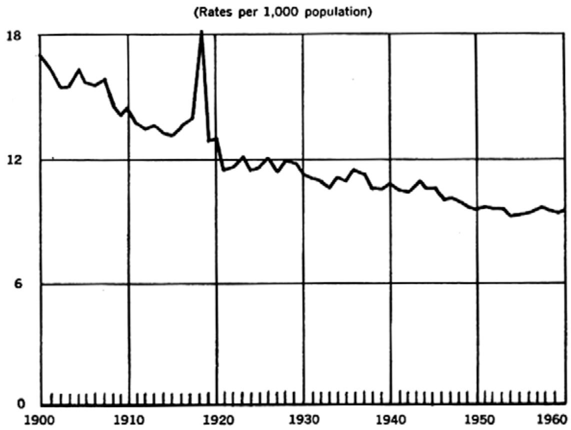

Fig. 1. Death rates: death registration states, 1900–32, and United States, 1933–60.

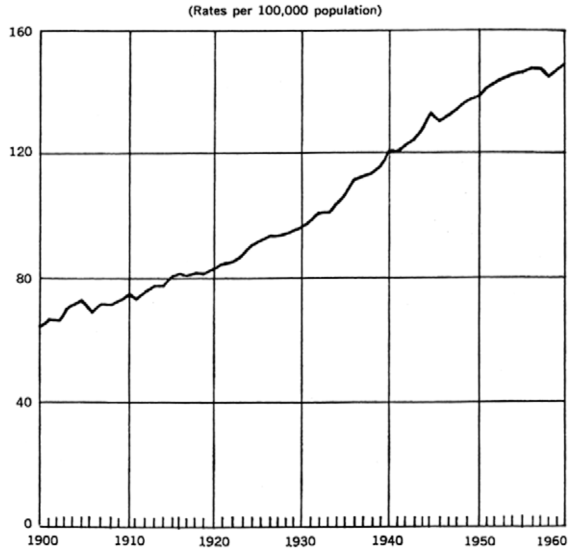

Fig. 2. Death rates for malignant neoplasms: death registration states, 1900–32, and United States, 1933–60.

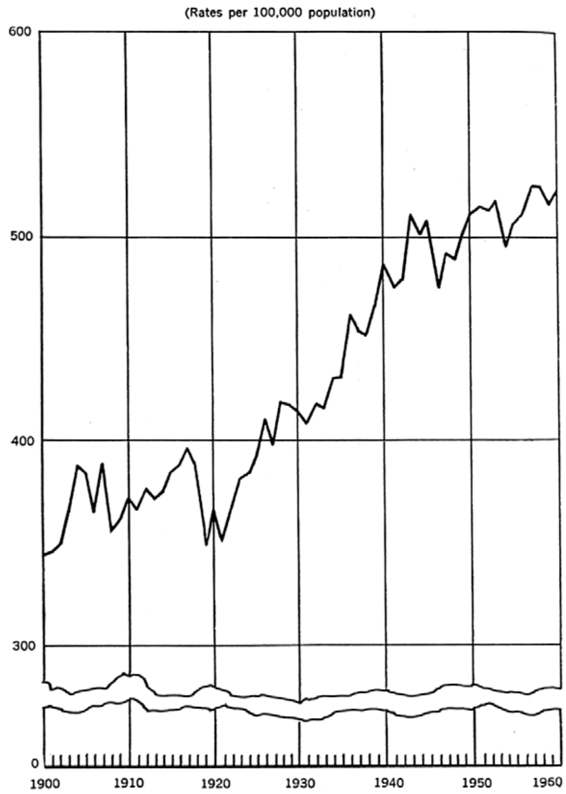

Fig. 3. Death rates for major cardiovascular renal diseases: death registration states, 1900–32, and United States, 1933–60.

electric service. In 1940 urban and rural residence information was not available for individual cancers as it was in 1930, but death rates for each cancer were available by state. They were used to calculate correlations between electric service by state and respiratory cancer, breast cancer and leukemia mortality.

All causes of death

There was no correlation between residential electrification and total death rate for urban areas, but there was a significant correlation for rural areas ($r = 0.659$, $p = <0.0001$). Fig. 5 shows the 1940 resident white death rates for urban and rural areas of states having greater than 96% of residences electrified and states having less than 50% of residences electrified. In the highly electrified states, urban and rural death rates were similar, but in low electrification states, the urban death rates were systematically higher than the rural death rates. The urban death rates were similar in both high and low electrification states.

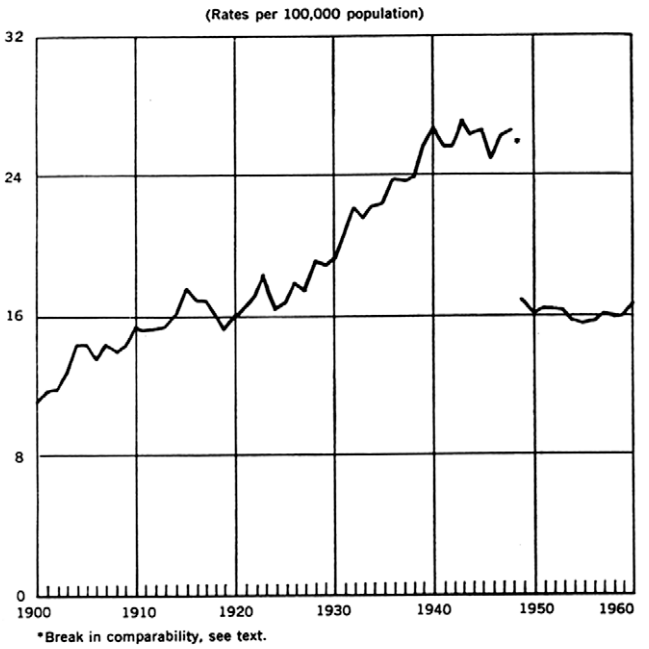

Fig. 4. Death rates for diabetes mellitus: death registration states, 1900–32, and United States, 1933–60.

All malignant neoplasms

In 1940, the urban total cancer rate was 49.2% higher than the rural rate. Both urban and rural cancer deaths rates were significantly correlated with residential electrification. Fig. 6 shows the 1940 resident white total cancer rates for urban and rural areas of states having greater than 96% of residences electrified and states having less than 50% of residences electrified. Four of the five high electrification states had similar urban and rural total cancer rates, while all the low electrification states had urban rates about twice as high as rural rates. Both urban and rural total cancer rates were lower in low electrification states than in high electrification states. Fig. 7 shows the time trend of the total cancer rate between 1920 and 1960 for Massachusetts (1940 electrification rate = 97.6%) and Louisiana (1940 electrification rate = 48.9%). The Massachusetts cancer rate was about twice that of Louisiana between 1920 and 1945. The Massachusetts rate leveled off in 1945, but the Louisiana rate increased steadily between 1920 and 1960. A declining urban–rural gradient for cancer is still evident in 1980–1990 US cancer incidence data [13]. Swedish investigators [14] have reported increasing cancer mortality and incidence time trend breaks in the latter half of the 20th century.

Table 3
1940 US white resident crude death rates per 100,000 by urban/rural residence.

Cause of death	ICD No.[a]	Urban rate	Rural rate	(%) Urban excess
All	1-200	1124.1	929.5	20.9
All cancers	47-55	145.8	97.7	49.2
Coronary disease	94	92.4	69.1	33.7
Other diseases of heart	90b,91,92a,d,e 93a,b,d,e 95a,c	217.0	162.8	33.3
Diabetes	61	33.2	20.0	66.0
Suicide	163-164	17.1	13.2	29.5
Motor vehicle accidents	170	26.6	26.3	1.1

[a] 1938 Revision International classification of disease.

Table 4
Correlation coefficients (r) 1940 crude US death rates by state by electrification for white resident deaths.

Cause	ICD No.[A]	Residence	r	r^2	p One tailed	Slope	Y intercept
All causes	1-200	Urban	0.083	0.007	0.285	0.007	11.114
		Rural	0.659	0.434	<0.0001	0.070	4.185
All cancers	45-55	Urban	0.667	0.445	<0.0001	0.883	75.970
		Rural	0.758	0.575	<0.0001	1.502	−10.040
Respiratory cancer[B]	47	State	0.611	0.374	<0.0001	0.071	1.020
Breast cancer female	50	State	0.794	0.630	<0.0001	0.170	−1.506
Diabetes	61	Urban	0.666	0.444	<0.0001	0.278	8.168
		Rural	0.693	0.480	<0.0001	0.366	−6.184
Leukemia[B]	72a	State	0.375	0.140	0.0042	0.021	1.980
Coronary artery	94	Urban	0.400	0.160	0.0024	0.494	61.570
Disease		Rural	0.781	0.610	<0.0001	1.252	25.319
Other diseases of the heart	90b, 91	Urban	0.449	0.202	0.0006	1.236	100.35
	92a,d,e 93a,b,d,e 95a,c	Rural	0.799	0.639	0.0001	2.887	−48.989
Suicide	163-4	Urban	0.077	0.006	0.2993	0.028	16.235
		Rural	0.729	0.532	<0.0001	0.181	0.299
Motor vehicle	170	Urban	−0.254	0.064	0.0408	−0.171	44.572
Accidents		Rural	0.451	0.203	0.0006	0.195	12.230

[A] International classification of diseases 1938 revision.
[B] Age adjusted death rate both sexes.

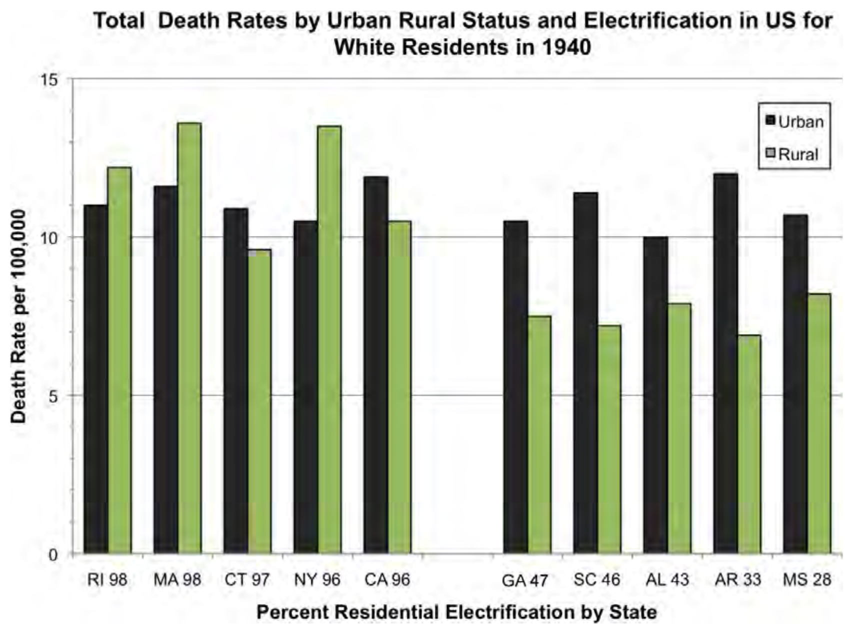

Fig. 5. All causes death rates by urban rural status and electrification in the US for white residents in 1940.

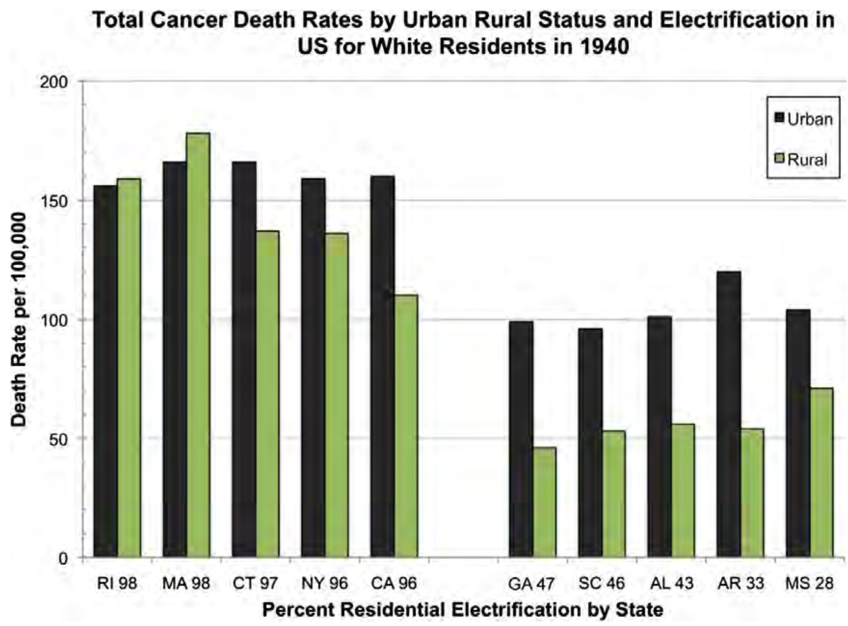

Fig. 6. Total cancer death rates by urban rural status and electrification in the US for white residents in 1940.

Respiratory cancer

No urban rural information was available for respiratory cancer, but the correlation between residential electrification and state death rates was $r = 0.611$; $p = <0.0001$. This cancer is etiologically strongly related to cigarette smoking, so the correlation with electrification is surprising. A large electrical utility worker cohort study found a high respiratory cancer incidence related to high frequency EMF transient exposure independent of cigarette smoking with a significant dose–response relationship [15].

Breast cancer

Although urban/rural information was not available for breast cancer, the 1940 state breast cancer death rates have a correlation of $r = 0.794$; $p = <0.0001$ with residential electrification. Fig. 8 shows the typical time trend of breast cancer death rates for a state with a high level of electrification (96%) and one with a low level of electrification (<50) in 1940. The California breast cancer death rate increased from 1920 to 1940, and then gradually decreased until 1960. The Tennessee breast cancer death rate is less than half of the California rate in 1920 and continues a steady increase until 1960.

Diabetes

This cause has a 66% urban excess. In spite of this, the correlation coefficients for urban and rural areas are similar at $r = 0.66$; $p = <0.0001$. There is some animal and human evidence that EMFs can effect insulin production and blood glucose levels [16]. Fig. 9

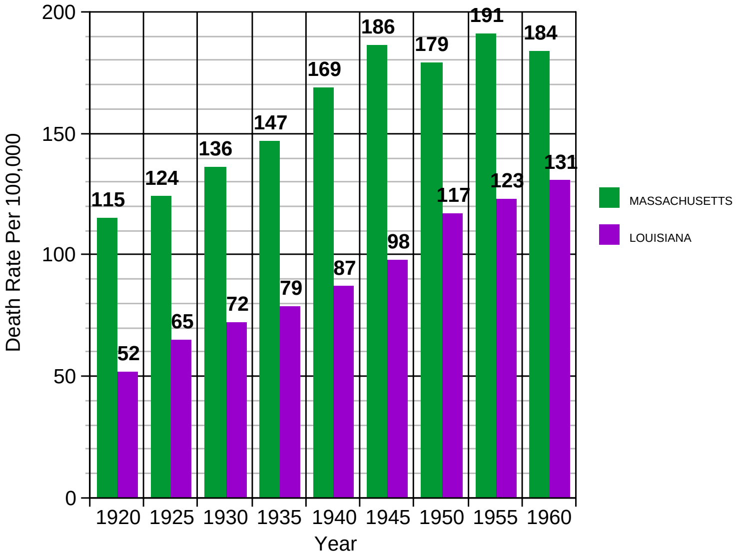

Fig. 7. US white resident total cancer death rates for Massachusetts (97.6% elect.) and Louisiana (48.9% elect.) by year.

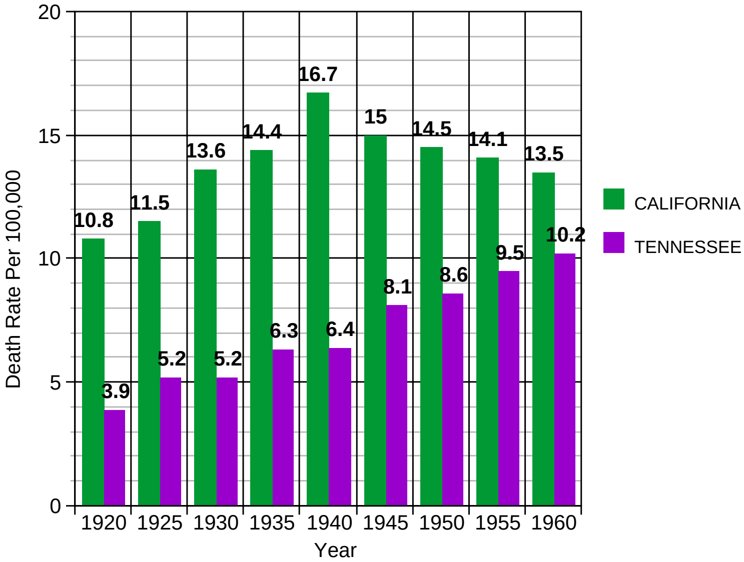

Fig. 8. US white resident breast cancer death rates for California (96% elect.) and Tennessee (50% elect.) by year.

shows that in states with low levels of electrification in 1940, the urban diabetes death rates are consistently higher than the rural rates, but are always lower than the urban and rural rates in the high electrification states.

Leukemia

Since the childhood leukemia age peak is strongly associated with residential electrification, it was interesting that the all leukemia death rate correlation was $r = 0.375$; $p = 0.0042$. Most of these deaths are in adults and are of different types of leukemia. A study of amateur radio operators showed a selective excess only of acute myelogenous leukemia [17].

Coronary artery disease and other heart disease

These two cause groups had the same percentage urban excess (33%), and very similar patterns of urban and rural correlation coefficients with residential electrification. The urban correlations were about $r = 0.4$ and rural deaths had correlations of 0.78 and 0.79, respectively. Fig. 10 shows the 1940 resident white coronary artery disease death rates for urban and rural areas of states having greater than 96% of residences electrified and states having less than 50% of residences electrified. Four of the five high electrification states had similar urban and rural total cancer rates, while all the low electrification states had urban rates about twice as high as rural rates. Urban and rural coronary artery death rates were lower in low electrification states than in high electrification states.

Suicide

The urban suicide death rate is about 30% higher than the rural rate. The urban suicide rate is not correlated with residential electrification ($r = 0.077$; $p = 0.299$), but the rural death rate is correlated with 1940 state residential electrification levels ($r = 0.729$; $p = <0.0001$). Fig. 11 shows the 1940 resident white suicide for

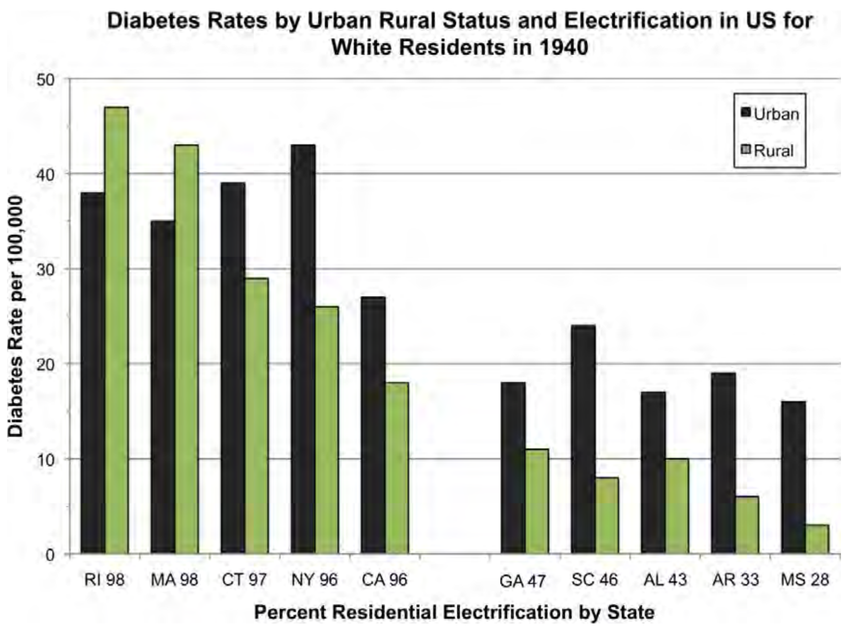

Fig. 9. Total diabetes rates by urban rural status and electrification in the US for white residents in 1940.

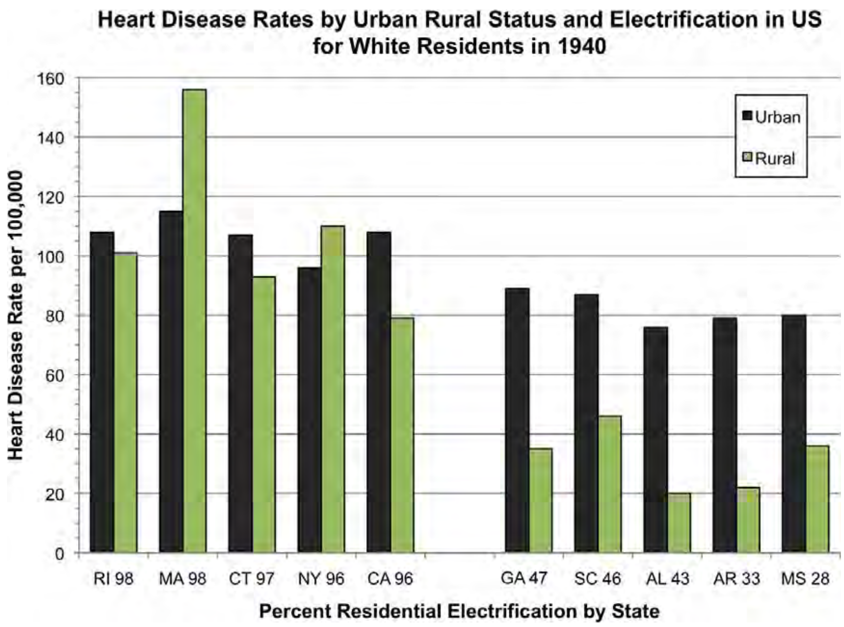

Fig. 10. Total heart disease rates by urban rural status and electrification in the US for white residents in 1940.

urban and rural areas of states having greater than 96% of residences electrified and states having less than 50% of residences electrified. In four of five high electrification states, rural suicide rates are higher than the urban rates. In all of the low electrification states, the urban rate is higher. The rural rates in the high electrification states are higher than the rural rates in the low electrification states. Fig. 12 shows X Y scatter plots for urban and rural suicide by electrification for 48 states. Suicide has been associated with both residential [18] and occupational [19] EMF exposure. Suicide is probably the visible peak of the clinical depression iceberg.

Motor vehicle accidents

Although the mortality rates are similar in urban and rural areas, the correlations with residential electrification levels are different. There is a slight negative correlation ($r = -0.254$) in urban areas and a positive correlation ($r = 0.451$) in rural areas. Since motor vehicle fatality is related to access to a vehicle and to speed. It may be that in the larger cities it was difficult to go fast enough for a fatal accident, and in rural areas especially on farms, a farmer who could afford electrification could also afford a car.

Discussion

When Edison and Tesla opened the Pandora's box of electrification in the 1880s, the US vital registration system was primitive at best, and infectious disease death rates were falling rapidly. City residents had higher mortality rates and shorter life expectancy than rural residents [8]. Rural white males in 1900 had an expectation of life at birth of over 10 years longer than urban residents.

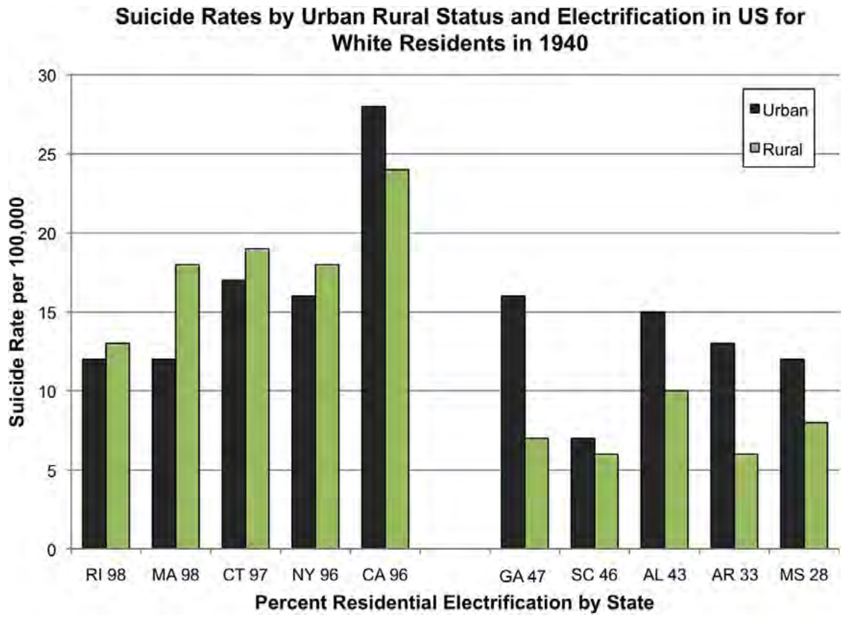

Fig. 11. Total suicide death rates by urban rural status and electrification in the US for white residents in 1940.

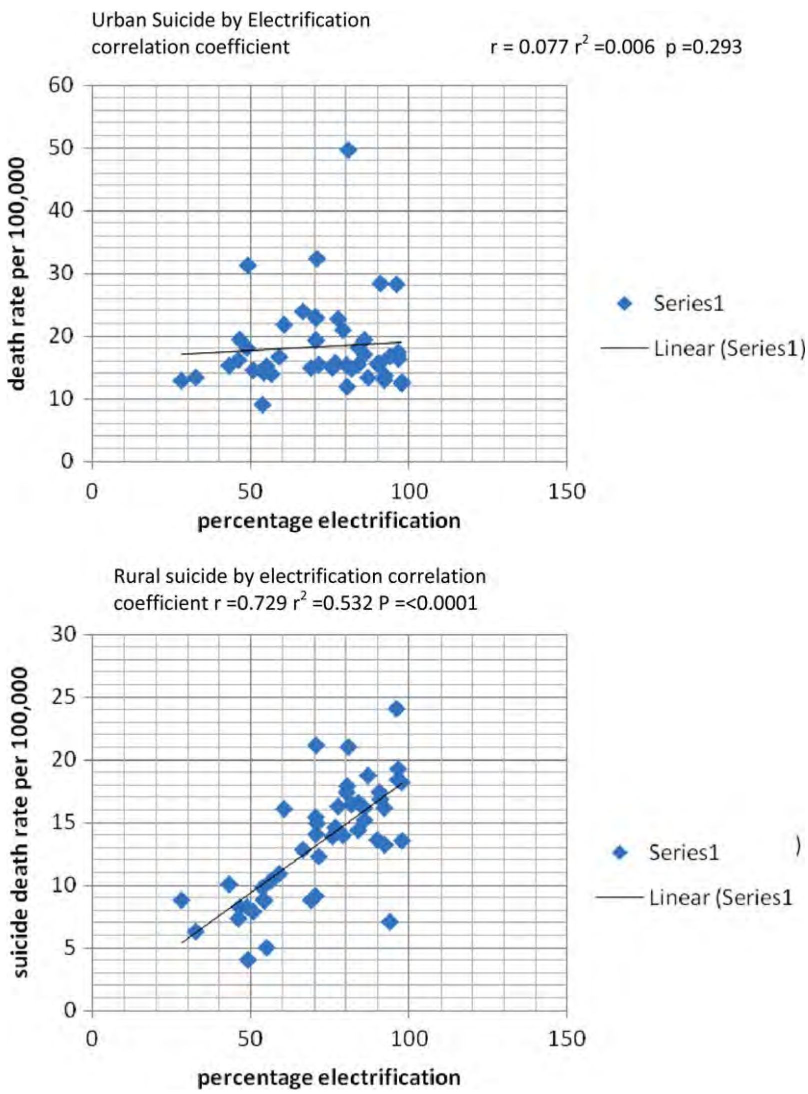

Fig. 12. 1940 US white resident urban rural suicide death rates by state and electrification.

Although the authors of the 1930 US vital statistics report noted a 58.2% cancer mortality excess in urban areas, it raised no red flags. The census bureau residential electrification data was obviously not linked to the mortality data. Epidemiologists in that era were still concerned with the communicable diseases.

Court Brown and Doll reported [20] the appearance of the childhood leukemia age peak in 1961, forty years after the US vital statistics mortality data on which it was based was available. I reported a cluster of childhood leukemia [21] a decade after it occurred, only because I looked for it. Real time or periodic analysis of national or regional vital statistics data is still only rarely done in the US.

The real surprise in this data set is that cardiovascular disease, diabetes and suicide, as well as cancer seem to be strongly related to level of residential electrification. A community-based epidemiologic study of urban rural differences in coronary heart disease and its risk factors was carried out in the mid 1980s in New Delhi, India and in a rural area 50 km away [22]. The prevalence of coronary heart disease was three times higher in the urban residents, despite the fact that the rural residents smoked more and had higher total caloric and saturated fat intakes. Most cardiovascular disease risk factors were two to three times more common in the urban residents. Rural electrification projects are still being carried out in parts of the rural area which was studied.

It seems unbelievable that mortality differences of this magnitude could go unexplained for over 70 years after they were first reported and 40 years after they were noticed. I think that in the early part of the 20th century nobody was looking for answers. By the time EMF epidemiology got started in 1979 the entire population was exposed to EMFs. Cohort studies were therefore using EMF-exposed population statistics to compute expected values, and case-control studies were comparing more exposed cases to less exposed controls. The mortality from lung cancer in two pack a day smokers is over 20 times that of non-smokers but only three times that of one pack a day smokers. After 1956, the EMF equivalent of a non-smoker ceased to exist in the US. An exception to this is the Amish who live without electricity. Like rural US residents in the 1940s, Amish males in the 1970s had very low cancer and cardiovascular disease mortality rates [23].

If this hypothesis and findings outlined here are even partially true, the explosive recent increase in radiofrequency radiation, and high frequency voltage transients sources, especially in urban areas from cell phones and towers, terrestrial antennas, wi-fi and wi-max systems, broadband internet over power lines, and personal electronic equipment, suggests that like the 20th century EMF epidemic, we may already have a 21st century epidemic of morbidity and mortality underway caused by electromagnetic fields. The good news is that many of these diseases may be preventable by environmental manipulation, if society chooses to.

Conflicts of interest statement

None declared.

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EXHIBIT 7

A New Electromagnetic Exposure Metric: High Frequency Voltage Transients Associated With Increased Cancer Incidence in Teachers in a California School

Samuel Milham, MD, MPH*,† **and L. Lloyd Morgan,** BS‡

Background *In 2003 the teachers at La Quinta, California middle school complained that they had more cancers than would be expected. A consultant for the school district denied that there was a problem.*
Objectives *To investigate the cancer incidence in the teachers, and its cause.*
Method *We conducted a retrospective study of cancer incidence in the teachers' cohort in relationship to the school's electrical environment.*
Results *Sixteen school teachers in a cohort of 137 teachers hired in 1988 through 2005 were diagnosed with 18 cancers. The observed to expected (O/E) risk ratio for all cancers was 2.78 (P = 0.000098), while the O/E risk ratio for malignant melanoma was 9.8 (P = 0.0008). Thyroid cancer had a risk ratio of 13.3 (P = 0.0098), and uterine cancer had a risk ratio of 9.2 (P = 0.019). Sixty Hertz magnetic fields showed no association with cancer incidence. A new exposure metric, high frequency voltage transients, did show a positive correlation to cancer incidence. A cohort cancer incidence analysis of the teacher population showed a positive trend ($P = 7.1 \times 10^{-10}$) of increasing cancer risk with increasing cumulative exposure to high frequency voltage transients on the classroom's electrical wiring measured with a Graham/Stetzer (G/S) meter. The attributable risk of cancer associated with this exposure was 64%. A single year of employment at this school increased a teacher's cancer risk by 21%.*
Conclusion *The cancer incidence in the teachers at this school is unusually high and is strongly associated with high frequency voltage transients, which may be a universal carcinogen, similar to ionizing radiation.* Am. J. Ind. Med. 2008. *© 2008 Wiley-Liss, Inc.*

KEY WORDS: high frequency voltage transients; electricity; dirty power; cancer; school teachers; carcinogen

BACKGROUND

Since the 1979 Wertheimer–Leeper study [Wertheimer and Leeper, 1979] there has been concern that exposure to power frequency (50/60 Hz) EMFs, especially magnetic fields, may contribute to adverse health effects including cancer. Until now, the most commonly used exposure metric has been the time-weighted average of the power-frequency magnetic field. However, the low risk ratios in most studies suggest that magnetic fields might be a surrogate for a more important metric. In this paper we present evidence that a

Abbreviations: EMF, electromagnetic fields; O, observed cases; E, expected cases; O/E, risk ratio; p, probability; Hz, Hertz or cycles per second; OSHA, Occupational Safety and Health Administration; OCMAP, occupational mortality analysis program; AM, amplitude modulation; GS units, Graham/Stetzer units; G/S meter, Graham/Stetzer meter; MS II, Microsurge II meter; mG, milligauss; EKG, electrocardiogram; LQMS, La Quinta Middle School.

Washington State Department of Health, Tumwater, Washington
†Retired.
‡Retired Electronic Engineer.
*Correspondence to: Samuel Milham, 2318 Gravelly Beach Loop NW, Olympia, WA 98502. E-mail: smilham2@comcast.net

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new exposure metric, high frequency voltage transients existing on electrical power wiring, is an important predictor of cancer incidence in an exposed population.

The new metric, GS units, used in this investigation is measured with a Graham/Stetzer meter (G/S meter) also known as a Microsurge II meter (MS II meter), which is plugged into electric outlets [Graham, 2005]. This meter displays the average rate of change of these high frequency voltage transients that exist everywhere on electric power wiring. High frequency voltage transients found on electrical wiring both inside and outside of buildings are caused by an interruption of electrical current flow. The electrical utility industry has referred to these transients as ‘‘dirty power.’’

There are many sources of ‘‘dirty power’’ in today’s electrical equipment. Examples of electrical equipment designed to operate with interrupted current flow are light dimmer switches that interrupt the current twice per cycle (120 times/s), power saving compact fluorescent lights that interrupt the current at least 20,000 times/s, halogen lamps, electronic transformers and most electronic equipment manufactured since the mid-1980s that use switching power supplies. Dirty power generated by electrical equipment in a building is distributed throughout the building on the electric wiring. Dirty power generated outside the building enters the building on electric wiring and through ground rods and conductive plumbing, while within buildings, it is usually the result of interrupted current generated by electrical appliances and equipment.

Each interruption of current flow results in a voltage spike described by the equation $V = L \times di/dt$, where V is the voltage, L is the inductance of the electrical wiring circuit and di/dt is the rate of change of the interrupted current. The voltage spike decays in an oscillatory manner. The oscillation frequency is the resonant frequency of the electrical circuit. The G/S meter measures the average magnitude of the rate of change of voltage as a function of time (dV/dT). This preferentially measures the higher frequency transients. The measurements of dV/dT read by the meter are defined as GS (Graham/Stetzer) units.

The bandwidth of the G/S meter is in the frequency range of these decaying oscillations. Figure 1 shows a two-channel oscilloscope display. One channel displays the 60 Hz voltage on an electrical outlet while the other channel with a 10 kHz hi-pass filter between the oscilloscope and the electrical outlet, displays the high frequency voltage transients on the same electrical outlet [Havas and Stetzer, 2004, reproduced with permission].

Although no other published studies have measured high frequency voltage transients and risk of cancer, one study of electric utility workers exposed to transients from pulsed

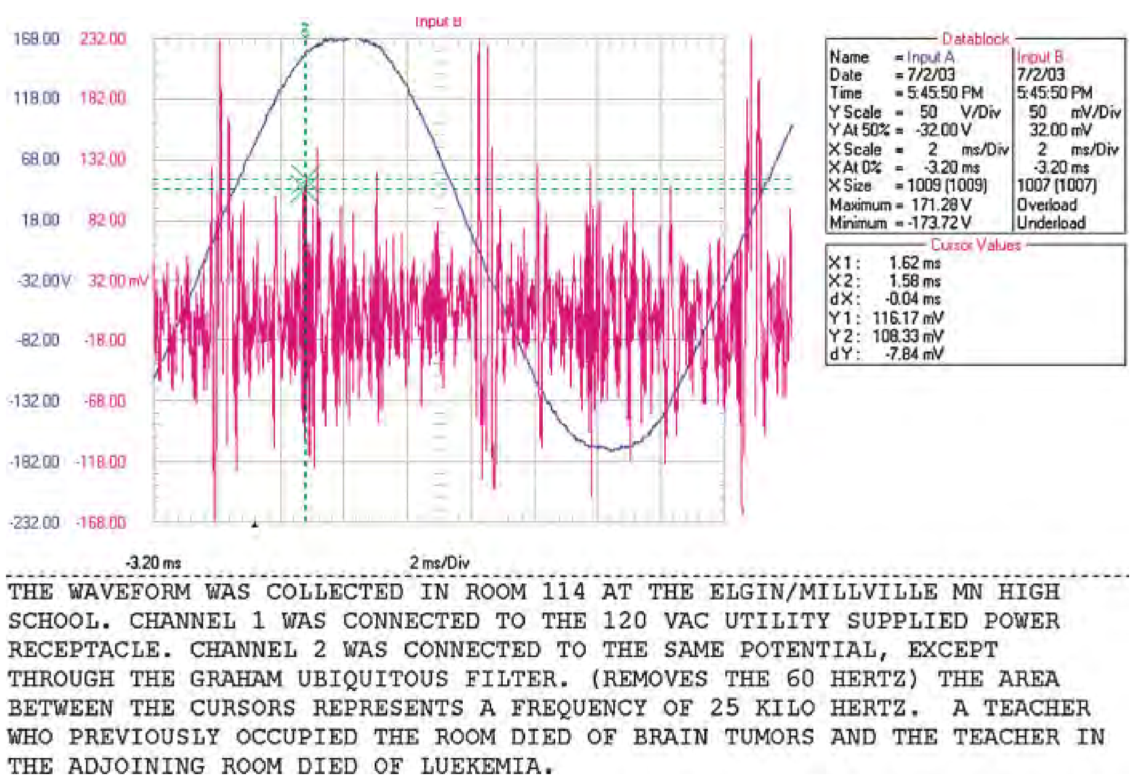


FIGURE 1. Oscilloscope display of dirty power: 60 Hz electrical power (channel 1) with concurrent high frequency voltage transients (channel 2). A 10 kHz hi-pass filter was used on channel 2 in order to filter out the 60 Hz voltage and its harmonics. [Color figure can be viewed in the online issue, which is available at www.interscience.wiley.com.]

electromagnetic fields found an increased incidence of lung cancer among exposed workers [Armstrong et al., 1994].

INTRODUCTION

In February 2004, a Palm Springs, California newspaper, The Desert Sun, printed an article titled, "Specialist discounts cancer cluster at school," in which a local tumor registry epidemiologist claimed that there was no cancer cluster or increased cancer incidence at the school [Perrault, 2004]. An Internet search revealed that the teacher population at La Quinta Middle School (LQMS) was too small to generate the 11 teachers with cancer who were reported in the article. The school was opened in 1988 with 20 teachers hired that year. For the first 2 years, the school operated in three temporary buildings, one of which remains. In 1990, a newly constructed school opened. In 2003, the teachers complained to school district management that they believed that they had too many cancers. Repeated requests to the school administration for physical access to the school and for teachers' information were denied. We contacted the teachers, and with their help, the cancers in the group were characterized. One teacher suggested using yearbooks to develop population-at-risk counts for calculating expected cancers. We were anxious to assess the electrical environment at the school, since elevated power frequency magnetic field exposure with a positive correlation between duration of exposure and cancer incidence had been reported in first floor office workers who worked in strong magnetic fields above three basement-mounted 12,000 V transformers [Milham, 1996]. We also wanted to use a new electrical measurement tool, the Graham/Stetzer meter, which measures high frequency voltage transients.

The Graham/Stetzer Microsurge II meter measures the average rate of change of the transients in Graham/Stetzer units (GS units). Anecdotal reports had linked dirty power exposure with a number of illnesses [Havas and Stetzer, 2004]. We decided to investigate whether power frequency magnetic field exposure or dirty power exposure could explain the cancer increase in the school teachers.

METHODS

After the school administration (Desert Sands Unified School District) had refused a number of requests to assist in helping us evaluate the cancers reported by the teachers, we were invited by a teacher to visit the school after hours to make magnetic field and dirty power measurements. During that visit, we noted that, with the exception of one classroom near the electrical service room, the classroom magnetic field levels were uniformly low, but the dirty power levels were very high, giving many overload readings. When we reported this to Dr. Doris Wilson, then the superintendent of schools (retired December, 2007), one of us (SM) was threatened with prosecution for "unlawful.. trespass," and the teacher who had invited us into the school received a letter of reprimand. The teachers then filed a California OSHA complaint which ultimately lead to a thorough measurement of magnetic fields and dirty power levels at the school by the California Department of Health Services which provided the exposure data for this study. They also provided comparison dirty power data from residences and an office building, and expedited tumor registry confirmation of cancer cases.

Classrooms were measured at different times using 3 meters: an FW Bell model 4080 tri-axial Gaussmeter, a Dexsil 310 Gaussmeter, and a Graham-Stetzer (G/S) meter. The Bell meter measures magnetic fields between 25 and 1,000 Hz. The Dexsil meter measures magnetic fields between 30 and 300 Hz. The G/S meter measures the average rate of change of the high frequency voltage transients between 4 and 150 KHz.

All measurements of high frequency voltage transients were made with the G/S meter. This meter was plugged into outlets, and a liquid crystal display was read. All measurements reported were in GS units. The average value was reported where more than one measurement was made in a classroom.

We measured seven classrooms in February 2005 using the Bell meter and the G/S meter. Later in 2005, the teachers measured 37 rooms using the same meters. On June 8, 2006, electrical consultants for the school district and the California Department of Health Services (Dr. Raymond Neutra) repeated the survey using the G/S meter and a Dexsil 320 Gaussmeter, measuring 51 rooms. We used results of this June 8, 2006 sampling in our exposure calculations, since all classrooms were sampled, multiple outlets per room were sampled, and an experienced team did the sampling. Additionally, GS readings were taken at Griffin Elementary school near Olympia, Washington, and Dr. Raymond Neutra provided GS readings for his Richmond California office building and 125 private California residences measured in another Northern California study.

All the cancer case information was developed by personal, telephone, and E-mail contact with the teachers or their families without any assistance from the school district. The local tumor registry verified all the cancer cases with the exception of one case diagnosed out of state and the two cases reported in 2007. The out-of state case was verified by pathologic information provided by the treating hospital. The teachers gathered population-at-risk information (age at hire, year of hire, vital status, date of diagnosis, date of death, and termination year) from yearbooks and from personal contact. The teachers also provided a history of classroom assignments for all teachers from annual classroom assignment rosters (academic years 1990–1991 to 2006–2007) generated by the school administration. The school administration provided a listing of school employees, including the teachers, to the regional tumor registry after the teachers involved the state health agency by submitting an OSHA complaint. The information we obtained anecdotally from the teachers, yearbooks, and classroom assignment rosters was nearly identical to that given to the tumor registry. None of the cancer cases were ascertained initially through the cancer registry search.

Published cancer incidence rates by age, sex, and race for all cancers, as well as for malignant melanoma, thyroid, uterine, breast, colon, ovarian cancers, and non-Hodgkin's lymphoma (NHL) were obtained from a California Cancer Registry publication [Kwong et al., 2001]. We estimated the expected cancer rate for each teacher by applying year, age, sex, and race-specific cancer incidence rates from hire date until June 2007, or until death. We then summed each teacher's expected cancer rate for the total cohort.

Using the California cancer incidence data, the school teacher data, and the GS exposure data, we calculated cancer incidence and risks. A replicate data set was sent to Dr. Gary Marsh and to Mike Cunningham at the University of Pittsburgh School of Public Health for independent analysis using OCMAP software. We calculated cancer risk ratios by duration of employment and by cumulative GS unit-years of exposure. We calculated an attributable risk percent using the frequencies of total observed and expected cancers, and performed trend tests [Breslow and Day, 1987] for cancer risk versus duration of employment and cumulative GS unit-years of exposure. Poisson *P* values were calculated using the Stat Trek website (Stat Trek, 2007). We also performed a linear regression of cancer risk by duration of employment in years and by time-weighted exposure in GS unit-years.

Since neither author had a current institutional affiliation, institutional review board approval was not possible. The teachers requested the study, and their participation in the study was both voluntary and complete. All the active teachers at the school signed the Cal OSHA request. The authors fully explained the nature of the study to study participants and offered no remuneration to the teachers for participation in the study. The authors maintained strict confidentiality of all medical and personal information provided to us by the teachers, and removed personal identifiers from the data set which was analyzed by the University of Pittsburgh. Possession of personal medical information was limited to the two authors. No patient-specific information was obtained from the tumor registry. With the individual's permission we provided the registry with case information for a teacher with malignant melanoma diagnosed out of state. The exposure information was provided by the California Department of Health Services. The basic findings of the study were presented to the Desert Sands Unified School District School Board and at a public meeting arranged by the teachers.

RESULTS

Electrical Measurements

In our seven-room survey of the school in 2005, magnetic field readings were as high as 177 mG in a classroom adjacent to the electrical service room. A number of outlets had overload readings with the G/S meter. Magnetic fields were not elevated (>3.0 mG) in the interior space of any of the classrooms except in the classroom adjacent to the electrical service room, and near classroom electrical appliances such as overhead transparency projectors. There was no association between the risk of cancer and 60 Hz magnetic field exposures in this cohort, since the classroom magnetic field exposures were the same for teachers with and without cancer (results not shown).

This school had very high GS readings and an association between high frequency voltage transient exposure in the teachers and risk of cancer. The G/S meter gives readings in the range from 0 to 1,999 GS units. The case school had 13 of 51 measured rooms with at least one electrical outlet measuring ''overload'' ($\geq$2,000 GS units). These readings were high compared to another school near Olympia Washington, a Richmond California office building, and private residences in Northern California (Table I). Altogether, 631 rooms were surveyed for this study. Only 17 (2.69%) of the 631 rooms had an ''overload'' (maximum, $\geq$2,000 GS units) reading. Applying this percentage to the 51 rooms surveyed at the case school, we would expect 1.4 rooms at the school to have overload GS readings ($0.0269 \times 51 = 1.37$). However, thirteen rooms (25%) measured at the case school had ''overload'' measurements above the highest value (1,999 GS units) that the G/S meter can

TABLE I. Graham/Stetzer Meter Readings: Median Values in Schools, Homes and an Office Building

Place	Homes	Office bldg	Olympia WA School	LQMS	Total
No. of rooms surveyed	500	39	41	51	531
Median GS units	159	210	160	750	$<270^{a}$
Rooms with overload GS units ($\geq$2,000)	4	0	0	13*	17

[a]Excludes homes as specific room data was not available.
$^{*}P = 3.14 \times 10^{-9}$.

TABLE II. Risk of Cancer by Type Among Teachers at La Quinta Middle School

Cancer	Observed	Expected	Risk ratio (O/E)	*P*-value
All cancers	18	6.51	2.78*	0.000098
Malignant melanoma	4	0.41	9.76*	0.0008
Thyroid cancer	2	0.15	13.3*	0.011
Uterus cancer	2	0.22	9.19*	0.019
Female breast cancer	2	1.5	1.34	0.24
All cancers less melanoma	14	6.10	2.30*	0.0025

*$P \leq 0.05$.

measure. This is a highly statistically significant excess over expectation (Poisson $P = 3.14 \times 10^{-9}$).

We noticed AM radio interference in the vicinity of the school. A teacher also reported similar radio interference in his classroom and in the field near his ground floor classroom. In May 2007, he reported that 11 of 15 outlets in his classroom overloaded the G/S meter. An AM radio tuned off station is a sensitive detector of dirty power, giving a loud buzzing noise in the presence of dirty power sources even though the AM band is beyond the bandwidth of the G/S meter.

Cancer Incidence

Three more teachers were diagnosed with cancer in 2005 after the first 11 cancer diagnoses were reported, and another former teacher (diagnosed out-of-state in 2000) was reported by a family member employed in the school system. One cancer was diagnosed in 2006 and two more in 2007. In the years 1988–2005, 137 teachers were employed at the school. The 18 cancers in the 16 teachers were: 4 malignant melanomas, 2 female breast cancers, 2 cancers of the thyroid, 2 uterine cancers and one each of Burkitt's lymphoma (a type of non-Hodgkins lymphoma), polycythemia vera, multiple myeloma, leiomyosarcoma and cancer of the colon, pancreas, ovary and larynx. Two teachers had two primary cancers each: malignant melanoma and multiple myeloma, and colon and pancreatic cancer. Four teachers had died of cancer through August 2007. There have been no non-cancer deaths to date.

The teachers' cohort accumulated 1,576 teacher-years of risk between September 1988 and June 2007 based on a 12-month academic year. Average age at hire was 36 years. In 2007, the average age of the cohort was 47.5 years.

When we applied total cancer and specific cancer incidence rates by year, age, sex, race, and adjusted for cohort ageing, we found an estimate of 6.5 expected cancers, 0.41 melanomas, 0.15 thyroid cancers, 0.22 uterine cancers, and 1.5 female breast cancers (Table II). For all cancers, the risk ratio (Observed/Expected = 18/6.5) was 2.78 ($P = 0.000098$, Poisson test); for melanoma, (O/E = 4/0.41) was 9.8 ($P = 0.0008$, Poisson test); for thyroid cancer (O/E = 2/0.15) was 13.3 ($P = 0.0011$, Poisson test); for uterine cancer (O/E = 2/0.22), was 9.19 ($P = 0.019$, Poisson test).

Table III shows the cancer risk among the teachers by duration of employment. Half the teachers worked at the school for less than 3 years (average 1.52 years). The cancer risk increases with duration of employment, as is expected when there is exposure to an occupational carcinogen. The cancer risk ratio rose from 1.7 for less than 3 years, to 2.9 for 3–14 years, to 4.2 for 15+ years of employment. There was a positive trend of increasing cancer incidence with increasing duration of employment ($P = 4.6 \times 10^{-10}$). A single year of employment at this school increases a teacher's risk of cancer by 21%.

Using the June 8, 2006 survey data (Table IV), the cancer risk of a teacher having ever worked in a room with at least one outlet with an overload GS reading (≥2000 GS units) and employed for 10 years or more, was 7.1 ($P = 0.00007$, Poisson test). In this group, there were six teachers diagnosed

TABLE III. Cancer Risk by Duration of Employment

Time at school	Average time	Teachers	% of teachers	Cancer observed	Cancer expected	Risk ratio (O/E)	Poisson p
<3 years	1.52 years	68	49.6	4	2.34	1.72	0.12
3–14 years	7.48 years	56	40.9	9	3.14	2.87*	0.0037
15+ years	16.77 years	12	8.8	5	1.02	4.89*	0.0034
Total		137	100	18	6.51	2.78*	0.000098

Positive trend test (Chi square with one degree of freedom = 38.8, $P = 4.61 \times 10^{-10}$).
*$P \leq 0.05$.

TABLE IV. Cancer in Teachers Who Ever Taught in Classrooms With at Least One Overload GS Reading ($\geq$2000 GS Units) by Duration of Employment

Ever in a room >2,000 GS units	Employed 10 + years	Total teachers	Cancers observed	Cancers expected	Risk ratio (O/E)	Poisson p
Yes	Yes	10	7[a]	0.988	7.1*	0.00007
Yes	No	30	3[a]	0.939	3.2	0.054
Total		40	10	1.93	5.1*	0.00003
No	Yes	19	2	1.28	1.6	0.23
No	No	78	6	3.25	1.8	0.063
Total		97	8	4.56	1.8*	0.047
Grand total		137	18	6.49	2.8*	0.000098

[a]One teacher had two primary cancers.
*$P < 0.05$.

with a total of seven cancers, and four teachers without a cancer diagnosis, who were employed for 10 or more years and who ever worked in one of these rooms. Five teachers had one primary cancer and one teacher had two primary cancers. These teachers made up 7.3% of the teachers' population (10/137) but had 7 cancers or 39% (7/18) of the total cancers. The 10 teachers who worked in an overload classroom for 10 years or more had 7 cancers when 0.99 would have been expected ($P = 6.8 \times 10^{-5}$ Poisson test). The risk ratio for the 8 teachers with cancer and 32 teachers without cancer, who ever worked in a room with an overload GS reading, regardless of the time at the school, was 5.1 ($P = 0.00003$, Poisson test). The risk ratio for 8 teachers with cancer and 89 teachers without cancer who never worked in a room with an overload G-S reading was 1.8 ($P = 0.047$, Poisson test). Teachers who never worked in an overload classroom also had a statistically significantly increased risk of cancer.

A positive dose-response was seen between the risk of cancer and the cumulative GS exposure (Table V). Three categories of cumulative GS unit-years of exposure were selected: <5,000, 5,000 to 10,000, and more than 10,000 cumulative GS unit-years. We found elevated risk ratios of 2.0, 5.0, and 4.2, respectively, all statistically significant, for each category. There was a positive trend of increasing cancer incidence with increasing cumulative GS unit-years of exposure ($P = 7.1 \times 10^{-10}$). An exposure of 1,000 GS unit-years increased a teacher's cancer risk by 13%. Working in a room with a GS overload ($\geq$2,000 GS units) for 1 year increased cancer risk by 26%.

An attributable risk percentage was calculated: (observed cancers-expected cancers)/observed cancers = (18−6.51)/18 = 63.8%.

The fact that these cancer incidence findings were generated by a single day of G/S meter readings made on June 8, 2006 suggests that the readings were fairly constant over time since the school was built in 1990. For example, if the 13 classrooms which overloaded the meter on June 8, 2006 were not the same since the start of the study and constant throughout, the cancer risk of teachers who ever worked in the overload rooms would have been the same as the teachers who never worked in an overload room.

Although teachers with melanoma and cancers of the thyroid, and uterus, had very high, statistically significant risk ratios, there was nothing exceptional about their age at hire, duration of employment, or cumulative GS exposure. However, thyroid cancer and melanoma had relatively short latency times compared to the average latency time for all 18 cancers. The average latency time between start of

TABLE V. Observed and Expected Cancers by Cumulative GS Exposure (GS Unit-Years)

Exposure group	<5,000 GS unit-years	5,000 to 10,000	>10,000 GS unit-years	Total
Average GS unit-years	914	7,007	15,483	
Cancers obs.	9	4	5	18
Cancers exp.	4.507	0.799	1.20	6.49
Risk ratio (O/E)	2.01*	5.00*	4.17*	2.78*
Poisson p	0.0229	0.0076	0.0062	0.000098

Positive trend test (Chi square with one degree of freedom = 38.0, $P = 7.1 \times 10^{-10}$).
*$P < 0.05$.

employment at the school and diagnosis for all cancers was 9.7 years. The average latency time for thyroid cancer was 3.0 years and for melanoma it was 7.3 years (with three of the four cases diagnosed at 2, 5, and 5 years).

An independent analysis of this data set by the University of Pittsburgh School of Public Health using OCMAP software supported our findings.

DISCUSSION

Because of access denial, we have no information about the source, or characterization of the high frequency voltage transients. We can assume, because the school uses metal conduit to contain the electrical wiring, that any resultant radiated electric fields from these high frequency voltage transients would radiate mainly from the power cords and from electrical equipment using the power cords within a classroom.

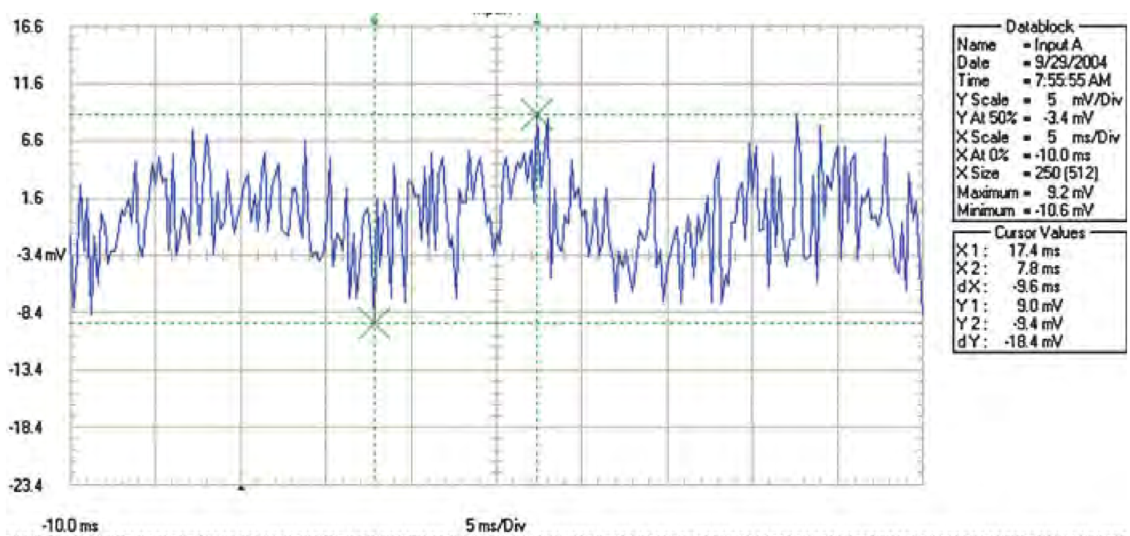
The school's GS readings of high frequency voltage transients are much higher than in other tested places (Table I). Also, teachers in the case school who were employed for over 10 years and who had ever worked in a room with an overload GS reading had a much higher rate of cancer. They made up 7.3% of the cohort but experienced 39% of all cancers.

The relatively short latency time of melanoma and thyroid cancers suggests that these cancers may be more sensitive to the effects of high frequency voltage transients than the other cancers seen in this population.

In occupational cohort studies, it is very unusual to have a number of different cancers with an increased risk. An exception to this is that cohorts exposed to ionizing radiation show an increased incidence of a number of different cancers. The three cancers in this cohort with significantly elevated incidence, malignant melanoma, thyroid cancer and uterine cancer, also have significantly elevated incidence in the large California school employees cohort [Reynolds et al., 1999].

These cancer risk estimates are probably low because 23 of the 137 members of the cohort remain untraced. Since exposure was calculated based on 7 days a week for a year, this will overstate the actual teachers' exposure of 5 days a week for 9 months a year.

We could not study field exposures in the classrooms since we were denied access to the school. We postulate that the dirty power in the classroom wiring exerted its effect by capacitive coupling which induced electrical currents in the

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The waveform was recorded between 2 EKG patches placed on the ankles of
XXXXXX XXXXXXXXX standing in front of his kitchen sink at his home near
Bright Ontario.  It shows a distorted 60 cycle sine wave containing high
frequencies applied to each foot, allowing high frequency current to
freely oscillate up one leg and down the other.  XXXXXX has been
diagnosed with prostrate cancer since moving to the house in less than a
year.  He was standing with feet shoulder width apart, wearing shoes, at
the time of the readings.  The amplitude increased as the feet were
placed farther apart.
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FIGURE 2. Oscilliscope display of 60 Hz current distorted with high frequencies taken between EKG patches applied to the ankles of a man standing with shoes on at a kitchen sink. [Color figure can be viewed in the online issue, which is available at www.interscience.wiley.com.]

teachers' bodies. The energy that is capacitively coupled to the teachers' bodies is proportional to the frequency. It is this characteristic that highlights the usefulness of the G/S meter. High frequency dirty power travels along the electrical distribution system in and between buildings and through the ground. Humans and conducting objects in contact with the ground become part of the circuit. Figure 2 [Havas and Stetzer, 2004, reproduced with permission] shows an oscilloscope tracing taken between EKG patches on the ankles of a man wearing shoes, standing at a kitchen sink. The 60 Hz sine wave is distorted by high frequencies, which allows high frequency currents to oscillate up one leg and down the other between the EKG patches.

Although not demonstrated in this data set, dirty power levels are usually higher in environments with high levels of 60 Hz magnetic fields. Many of the electronic devices which generate magnetic fields also inject dirty power into the utility wiring. Magnetic fields may, therefore, be a surrogate for dirty power exposures. In future studies of the EMF-cancer association, dirty power levels should be studied along with magnetic fields.

The question of cancer incidence in students who attended La Quinta Middle School for 3 years has not been addressed.

CONCLUSION

The cancer incidence in the teachers at this school is unusually high and is strongly associated with exposure to high frequency voltage transients. In the 28 years since electromagnetic fields (EMFs) were first associated with cancer, a number of exposure metrics have been suggested. If our findings are substantiated, high frequency voltage transients are a new and important exposure metric and a possible universal human carcinogen similar to ionizing radiation.

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EXHIBIT 8

Wildlife Conservation and Solar Energy Development in the Desert Southwest, United States

JEFFREY E. LOVICH AND JOSHUA R. ENNEN

Large areas of public land are currently being permitted or evaluated for utility-scale solar energy development (USSED) in the southwestern United States, including areas with high biodiversity and protected species. However, peer-reviewed studies of the effects of USSED on wildlife are lacking. The potential effects of the construction and the eventual decommissioning of solar energy facilities include the direct mortality of wildlife; environmental impacts of fugitive dust and dust suppressants; destruction and modification of habitat, including the impacts of roads; and off-site impacts related to construction material acquisition, processing, and transportation. The potential effects of the operation and maintenance of the facilities include habitat fragmentation and barriers to gene flow, increased noise, electromagnetic field generation, microclimate alteration, pollution, water consumption, and fire. Facility design effects, the efficacy of site-selection criteria, and the cumulative effects of USSED on regional wildlife populations are unknown. Currently available peer-reviewed data are insufficient to allow a rigorous assessment of the impact of USSED on wildlife.

Keywords: solar energy development, Mojave Desert, Sonoran Desert, wildlife, desert tortoises

The United States is poised to develop new renewable energy facilities at an unprecedented rate, including in potentially large areas of public land in the Southwest. This quantum leap is driven by escalating costs and demand for traditional energy sources from fossil fuels and by concerns over global climate change. Attention is focused largely on renewable forms of energy, especially solar energy. The potential for utility-scale solar energy development (USSED) and operation (USSEDO) is particularly high in the southwestern United States, where solar energy potential is high (USDOI and USDOE 2011a) and is already being harnessed in some areas. However, the potential for USSEDO conflicts with natural resources, especially wildlife, is also high, given the exceptional biodiversity (Mittermeier et al. 2002) and sensitivity (Lovich and Bainbridge 1999) of arid Southwest ecosystems, especially the Mojave (Randall et al. 2010) and Sonoran Deserts, which are already stressed by climate and human changes (CBI 2010). In addition, the desert Southwest is identified as a "hotspot" for threatened and endangered species in the United States (Flather et al. 1998). For these reasons, planning efforts should consider ways to minimize USSEDO impacts on wildlife (CBI 2010). Paradoxically, the implementation of large-scale solar energy development as an "environmentally friendly" alternative to conventional energy sources may actually increase environmental degradation on a local and on a regional scale (Bezdek 1993, Abbasi and Abbasi 2000) with concomitant negative effects on wildlife.

A logical first step in evaluating the effects of USSEDO on wildlife is to assess the existing scientific knowledge. As renewable energy development proceeds rapidly worldwide, information is slowly accumulating on the effects of USSEDO on the environment (for reviews, see Harte and Jassby 1978, Pimentel et al. 1994, Abbasi and Abbasi 2000). Gill (2005) noted that although the number of peer-reviewed publications on renewable energy has increased dramatically since 1991, only 7.6% of all publications on the topic covered environmental impacts, only 4.0% included discussions of ecological implications, and less than 1.0% contained information on environmental risks. A great deal of information on USSEDO exists in environmental compliance documents and other unpublished, non-peer-reviewed "gray" literature sources. Published scientific information on the effects on wildlife of any form of renewable energy development, including that of wind energy, is scant (Kuvlesky et al. 2007). The vast majority of the published research on wildlife and renewable energy development has been focused on the effects of wind energy development on birds (Drewitt and Langston 2006) and bats (Kunz et al. 2007) because of their sensitivity to aerial impacts. In contrast, almost no information is available on the effects of solar energy development on wildlife.

From a conservation standpoint, one of the most important species in the desert Southwest is Agassiz's desert

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