RESPONSE TO AEMC DRAFT RULE DETERMINATION 4 APRIL 2024
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1. Introduction

This introduction of Smart Meters is being driven by the power industry because of the possible benefits for them with already shown capacity to increase revenue in a potentially falling revenue scenario.

If the data that can be gained from smart Meters is so necessary for industry, then industry can install them on their own networks to show how and when electricity is being used. This should provide the same numbers from summing each individual account.

Many customers will not have the understanding or capacity to utilise differential tariff rate and will thus be caught in higher accounts that they may not be able to afford in these tight economic times.

This Rule Change has come from a portion of the industry. Where are the comments from the rest of the industry and from customers?

2. Use of Smart Meters

Smart Meters have been promoted as the 'answer' for many years. At a city house, they could be used as separate meters for water, gas and electricity. With the present concerns about electromagnetic field (RF radiation) impacts on people, animals, insects, birds and plants, it would be prudent to minimise their use in domestic applications.

There does not appear to be any 'environmental impact' commentary in the 4th April 2024 documents. These rules seem to have been developed following input from a wide group of committed stakeholders (item 12 in the Summary)

It is the intention of electricity suppliers and retailers to introduce differential tariffs for time/type of electricity use. Many customers will wake up to even larger accounts from this practice.

Use of these meters also enables the supply companies to restrict power use at a premise without advice to that premise owner/occupier. This was reported to have been done recently when air-conditioners were turned off in an area.

It is understood that the current meters may need to be replaced. It is imperative that all premise account holders be given the right to choose a meter which is non-radiating.

3. Deployment of Smart Meters

The deployment of Smart Meters in Queensland has been done with stealth – new premises, cash back with installation on purchase of certain appliances, replacement meters at the wish of the supplier/retailer and without conversation with the owner/occupier.

This Rule uses requests from other State organisations to drive the agenda in Queensland.

Very large capital amounts are quoted for the top of the range meters and little is said about plain digital meter applications and options for customers.

4. Consumer Benefits

The average consumer wants:

- **A reliable supply**
- **Simple processes – not complicated information systems**
- **Reasonable rates for when they desire electricity use**
- **Not having to juggle uses to have lesser rates**
- **Not having to look at the clock before making a cup of tea..**
- **An opportunity to retain simple metering**

There do not appear to be any benefits that might fit all of the above

5. Industry Benefits

If the benefits of having Smart Meters are shown to consumers and they accept those benefits are real, and in such a way that universal use is accepted, then there would be no reason for the Rule.

The only party that will benefit from the Rule is the supply/retail segment.

The unfortunate message from the Rule to customers is:

- **YOU WILL HAVE SMART METERS WHEN WE WANT IT TO BE,**
- **YOU WILL PAY FOR THEM, AND**
- **YOU WILL HAVE TO MANAGE YOUR TIME OF USE OR PAY MORE FOR YOUR ELECTRICITY**
- **THANK YOU**

6. Apparent Market Predictions

The market predictions for use are probably made by the current participants in the industry. It is acknowledged in item 7 of the Summary, that 'The energy landscape is undergoing unprecedented change…'

Reference is made to 'Clean Disruption of Energy and Transportation' by Tony Seba in June 2014. His predictions are that with this unprecedented change that the prices for electricity should dramatically fall. The cover also includes the following statement:

'How Silicon Valley will make oil, nuclear, natural gas, coal, electric utilities and conventional cars obsolete by 2030'.

Many of his predictions are being shown to be on track.

7. Reality of this being an Economic Solution

If the predictions in this above referenced book are even likely, then the industry can not afford this enormous capital expenditure and possible impacts on the environment and people.

8. Community expectations

The following are reasonable community expectations:

- **Justification of the need for individual Smart Meters when industry required data can be gained from their own local area data – from an area serviced by each local transformer**
- **Acceptance of the Class 2B carcinogen possibility by the industry and clear evidence of insurances held about this matter**
- **Ability for each customer to choose a non-transmitting digital meter**
- **Demonstration that the process is economically sound considering the significant and very volatile changes in the industry that are taking place**
- **Information for customers about the data to be collected, how it is to be used, how it is to be applied to accounts and who outside the industry would have an ability to purchase and/or use the data**

9. Community paper articles

https://amp.abc.net.au/article/103856952

https://stopsmartmeters.com.au/2019/09/17/smart-meter-fires-and-electrical-problems/

https://stopsmartmeters.com.au/2024/01/01/french-court-orders-removal-of-mans-smart-meter

10. Australian Consumer Law

- ***Misleading or deceptive conduct*: Under the Australian Consumer Law (ACL), it is prohibited to engage in misleading or deceptive conduct in trade or commerce. If the power industry is promoting smart meters as a solution without adequately disclosing potential health risks, environmental impacts, or the potential for increased costs to customers, it could be argued that they are engaging in misleading or deceptive conduct.**
- ***Unfair contract terms:* The ACL includes provisions that render unfair contract terms void. If the terms and conditions imposed by power suppliers or retailers regarding the installation and use of smart meters are found to be unfair, they may be unenforceable.**
- ***Consumer guarantees*: The ACL provides consumer guarantees for goods and services. If customers are not provided with accurate and transparent information about the data collected by smart meters, how it will be used, and who can access or purchase the data, it could be argued that the power industry is failing to meet the consumer guarantee of providing adequate information.**
- ***Product safety*: Smart meters, being electronic devices, must meet certain safety standards to be legally sold or supplied in Australia. If there are concerns regarding the safety of smart meters, particularly in terms of electromagnetic field (RF radiation) impacts, it may be argued that the power industry is not meeting the required product safety standards.**