

Submission: Accelerating Smart Meter Deployment

This submission highlights some concerns around

1. the nature and role of the AEMC
2. public consultation
3. transparency
4. decarbonisation
5. privacy
6. transfer to external entities of control over energy consumption

And calls on the AEMC to defer a decision around the rollout of Smart Meter technology until it has been able to demonstrate a commitment to integrity in each of these areas.

1. The nature and role of the AEMC

I note in 'About Us'¹ that the "Australian Energy Market Commission (AEMC) is an independent statutory body" whose rules "have the force of law" and "which reports to... energy ministers". I would therefore submit that, since the AEMC ultimately supports the public service, it is in fact answerable to its employers, the tax-paying Australian public. It therefore has an obligation to carry out adequate public consultation.

2. Public Consultation

I would contend that this proposed rollout has not been openly shared with the public, and that, while submissions are accepted, this has not been made clear to the public.

I have not been asked by any representative of the AEMC about my opinion about the proposed roll-out of Smart Meter, and I am not aware of any such consultation process. I call on the AEMC to demonstrate that they have engaged in thorough public consultation with Australian citizens.

I would respectfully remind the AEMC that, as part of the Public Service system, they are employed by the Australian public whom they serve.

3. Transparency

I note in the overview² that Core Reforms include several items which are being portrayed as benefits to the end consumer. I call on the AEMC to reveal in a transparent manner how each of the following things will be implemented, and their implications:

- "expanding customers, control of... their energy use". How will this change give more control of energy use to customers?
- promotes "the cost-effective decarbonization of the energy market". Exactly how?
- "saves energy". Will this involve the external control of how much energy is used in peak times, for example?

- “builds social license for the smart meter acceleration program”. What does this phrase mean?

4. I call on the AEMC to provide robust evidence that “the cost-effective decarbonization of the energy market”³ is both necessary and possible to achieve via the proposed rollout.

5. I respectfully ask the AEMC to reveal how this proposed rollout will impact consumer privacy.

6. I call on the AEMC to transparently describe how the objectives under point 3 above will be achieved without the control of energy use being shifted away from the consumer and to the AEMC or its subsidiary energy providers.

In light of the above concerns, I call on the AEMC to call a moratorium on decisions around the proposed rollout of Smart Meters until the above concerns have been adequately addressed.

Yours sincerely,

Suzanne Rosenberg



References

1. <https://www.aemc.gov.au/about-us>
2. [https://www.aemc.gov.au/rule-changes/accelerating-smart-meter-deployment#:~:text=deployment%20rule%20change.-,On%204%20April%202024%2C%20the%20Australian%20Energy%20Market%20Commission%20\(AEMC,achieving%20universal%20uptake%20by%202030](https://www.aemc.gov.au/rule-changes/accelerating-smart-meter-deployment#:~:text=deployment%20rule%20change.-,On%204%20April%202024%2C%20the%20Australian%20Energy%20Market%20Commission%20(AEMC,achieving%20universal%20uptake%20by%202030)
3. above link: “Core reforms to deliver the benefits that smart meters offer”: point 1