

Submission on Draft Rule Determination – Accelerating Smart Meter Deployment ERC0378

Dear Sir or Madam,

I am opposed to two aspects of your draft rule on accelerating smart meter deployment – removal of right to refuse a smart meter, and the civil penalties on electricity suppliers. I am a scientist by training. Though some electricity retailers have asked for a rule, it is by no means the case that benefits will occur for all NEM customers. In fact, detriment does occur to some and may occur to others, of a range of types, and proposed benefits to the bulk of consumers may be illusory in practice.

1. Health detriments

a. I am not alone in experiencing sleep disturbance, fatigue and tinnitus from wireless radiofrequency communications. I can also have balance disturbance, and periods of sinus bleeding from exposures to mobile phone tower emissions or mobile phones switched on in close proximity. I stress that the symptoms preceded my knowledge that in fact such symptoms can occur, are related to the exposures, and are on my medical records.

b. Such sensitivity has been shown in scientific studies, including scientific studies in which subjects had no knowledge of whether exposures were occurring. I will give just 3 references which discuss this matter:

<https://www.researchgate.net/publication/335881682> Electromagnetic field reduction restores health of electro-sensitive people

<https://www.researchgate.net/publication/377910587> Molecular biomarkers in Electrohypersensitivity and Multiple Chemical Sensitivity How They Can Help Diagnosis Follow-Up and in Etiopathologic Understanding

<https://pubmed.ncbi.nlm.nih.gov/38068473/>

c. Those who contest the result of studies into heightened sensitivity to radiofrequency fields fail to recognise factors such as that effects can persist for variable times when exposure is turned off. There have been court decisions overseas recognising the condition. Radio and microwave electromagnetic fields are recognised as a class 2B carcinogen. The current standards regarding such exposures are based solely on heating when the mechanisms are not heating related. It is irrelevant exactly whether there are genetic factors or pre-existing nervous system differences (as with myelination of nerves) – people who have sensitivity have to avoid such exposures..

2. Inequity of the proposed draft rule

a. the 61 page draft discussion consistently uses the phrases “universal uptake by 2030” and “improve outcomes for consumers”. All the focus is on right to request not right to decline (see 2.3.1 on page 7 of your draft). See also page 25 which specifically states “remove option to opt-out of smart meter upgrade”.

b. I draw your attention to the fact that consumers can't be forced to undertake (undefined) rectification works at their premises to enable smart meter installation, yet AEMC considers it equitable to force a smart meter on someone who will react to it. If I am forced to have a smart meter there would be at most one room (one bedroom in my house) that would be free of impact – and I already have had to shield half the house just to survive with life quality because of mobile phone towers 500 meters away. It is harder to shield from a smart meter. I do

not use any wireless devices and will never get solar panels. I do not go out except for medical appointments because of my sensitivity and immune compromise.

c. It is also denial of human rights for those consumers who have a concern about the possible side effects long term of such exposures, to remove their right to decline a wireless meter.

3. The claim that benefits will accrue to all consumers in terms of costs and convenience and other benefits, can't be substantiated for the following reasons:

a. Many consumers already monitor their energy usage by commonsense, turning off devices and thinking before buying or using them – and **that is what should be being encouraged, and can be done by any person – doesn't require a smart meter.**

b. Energy costs have never gone down in the past and they are not going to in the future for consumers. Energy retailers are in the business of selling energy. What is more likely to occur is that with increased control over networks, **energy retailers will re-structure their costs in ways not controllable by AEMC** even with the steps outlined in the draft ruling. Quoting your own document, on page 20 of your draft rule determination “ Although retailers do not typically pass on upfront costs to customers, they may change their pricing policies in the future, noting retailers are not prevented from doing so under the current regulatory framework.”

4. The problems of civil penalties on energy retailers and accelerated rollout

a. Civil penalties make the energy retailer the “meat in the sandwich”, disrupting the relationship with consumers. I foresee an upsurge in complaints to ombudsmen, to the media and wherever else people can turn if that relationship is fractured. Australians don't like being told what to do.

b. Regulatory costs under the draft plan are likely to be passed on as administrative costs.

c. The mandated rollout in Victoria years ago was associated with some cases of inadequately trained and supervised installers. There is no provision I can see within your draft ruling to address this issue – by explicit requirement of energy retailers and oversight that it occurs.

IN CONCLUSION

Leave the right to use a legacy meter and non-wireless meter if it fails. Do not impose civil penalties on energy retailers. Use other measures to increase uptake for consumers who want a smart meter. Address the issues of concern to energy retailers in other ways. I would suggest:

1. subsidies for the installation of home storage batteries for those with solar panels, to ameliorate the problem of excessive power flows to the network in the middle of the day/ hot days of the year

2. education of consumers regarding turning off devices when not in use and on the energy star system for appliances and white goods

3. putting the money into resilience of the energy networks to climate change events – a far more important issue than energy retailers offering small costing reductions to “compliant consumers” while focussing on building market share. **There is no point in knowing where the problems are in more detail if there is no way to actually generate enough power.**

Please don't ignore those most adversely impacted by your draft rule in its current form.

Thank you for your attention.