

**Australian Privacy Foundation**  
**Revised Policy Statement on Smart Meters**

9 June 2024

APF's Smart Grids and Smart Meters Policy Statement dates back to 2011:  
<https://privacy.org.au/policies/smart-grids/>

In 2022, APF also published a Public Information Paper on Privacy, Smart Meters and Electricity Usage Data: <https://privacy.org.au/privacy-smart-meters-and-electricity-usage-data/>

An update to the Policy Statement is needed.

**INDUSTRY PRACTICES RELATING TO HOUSEHOLD ENERGY DATA**

**1. Centralised data-holdings of fine-grained data about household energy usage threaten personal safety, because:**

- Vacant and low-occupancy premises can be detected
- Patterns of household occupancy over daily and weekly periods are readily evident
- Inferences can be drawn with reasonable levels of confidence about the number, and even age and gender of the occupants, and about their power-usage patterns
- If very-short-interval data is collected, individual device-types are detectable
- The data is capable of disclosing information in close to real-time

This is a serious concern for various categories of people, particularly those at risk, including victims of domestic violence, female-only households, and families with young children. It is also a source of anxiety for many other people whether or not it represents a real threat to their safety.

**2. Centralised data-holdings of fine-grained data about household energy usage are both consumer-hostile and privacy-invasive, because:**

- The data provides the many organisations in the energy supply chain with the ability to exercise power over consumers
- The data is capable of being accessed by organisations beyond the energy supply chain, to the disadvantage of householders
- The data is capable of disclosing usage of particular devices where the data is collected at a sufficiently high level of intensity and granularity
- Data Breach Notification schemes have made very clear that all organisations are subject to ongoing attacks, that most organisations have inadequate data security safeguards in place, that a great many hacks are successful in extracting data, and that successful hacks create risks for individuals that are difficult to understand, and difficult, time-consuming and frustrating to mitigate, resulting in anxiety for many individuals

This is an abuse of consumers' economic and privacy interests, and a source of stress for many people, particularly those who try to live private lives.

**3. The collection, retention, use and disclosure of data that is a threat to safety, and abusive of consumer and privacy interests requires very substantial justification.**

**4. The argument that consumers benefit individually from the transmission of intensive energy-usage data and its storage in an industry-accessible database has always been at best wishful thinking and at worst fraudulent. This is because:**

- Few consumers are capable of time-shifting their energy usage
- Consumers buy replacement equipment infrequently, and factors other than energy-consumption commonly dominate their choices
- Few consumers have sufficient understanding of, and commitment to, monitoring their usage and taking actions that will reduce their usage and/or costs
- The net financial benefits were always small, and are already being rapidly reduced by an energy industry that is both strongly profit-oriented and faced by substantial demands for capital that exceed their willingness to invest

5. **Consumer benefit is already being eroded by means of financial penalties that it is proposed be applied to households that provide renewable energy at times inconvenient to existing operators.** This arises in turn because of the gross inadequacy of privatised energy industries' investment in the upgrading of distribution networks in order to cope with and effectively exploit renewable energy sources.
6. **The argument that fine-grained, household-level energy usage data is needed in order to manage the grid has always been seriously at odds with reality.**  
Data for grid management is needed at a higher level of demand aggregation than the individual household. Metering is needed at points within the distribution network, no deeper than the level of the final step-down transformer, not at individual premises.
7. **There is considerable incentive for the industry to seek ways to monetise the data-holdings.** That inevitably involves re-purposing intensive personal data that has been extracted under duress, abuses privacy rights, and provides very limited benefits to householders.
8. **All that is needed in order to reduce the labour costs associated with manual meter-reading is a meter that aggregates energy usage data over time, and transmits the aggregated data, and only the aggregated data, from each household once per payment cycle.**

## CONCLUSIONS

9. **None of the arguments that are advanced justify centralised data-holdings of fine-grained data about household energy usage.**
10. **The industry's approach to the gathering of energy usage data needs to be significantly adapted, by means of the following measures:**
  - **Address grid management by gathering data upstream, not at the level of individual households**
  - **Migrate the functionality of meters to transmission of aggregated data only, and only once per payment-cycle**
  - **In the meantime:**
    - **Continue the availability of Type 4A / non-transmitting meters**
    - **Stop suppressing information about the availability of Type 4A meters**
    - **Make information about the availability of Type 4A meters readily available**