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Public Accounts and Estimates Committee

Submission No. 11

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STOP SMART METERS AUSTRALIA INC
Reg. No. A0059190N ABN 14 717 028 504

Submission to the Public Accounts and Estimates Committee
Parliament of Victoria

Inquiry into Findings of Victorian Auditor-General Reports 2009-10

Towards a 'Smart Grid' – the roll-out of the Advanced Metering Infrastructure

Submitted 15th November 2013

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Introduction

Stop Smart Meters Australia (SSMA) welcomes the Victorian Parliament's Public Accounts and Estimates Committee's invitation to provide a submission addressing the findings and recommendations contained within the Victorian Auditor-General's 2009 report *Towards a 'Smart Grid' – the roll-out of Advanced Metering Infrastructure*.

SSMA strongly supports the conclusions reached in the Auditor-General's report. Given the seriousness of the impact which this rollout has had on the Victorian population, extending far beyond what was originally envisaged by the Auditor-General, we are disappointed that the follow-up has occurred considerably later than the usual six months from tabling in Parliament. However, we are pleased that the Committee is now reviewing the report's findings and recommendations. We hope that its resolve to retain a broad scope for its terms of references will result in a closer examination of all the issues.

SSMA is particularly concerned that the rollout's systemic faults, which were highlighted in the 2009 report, have continued unabated, in SSMA's opinion, through to 2013. In particular, the continuing lack of consultation with consumers, whom we believe should be viewed as prime stakeholders, has been extremely disappointing. The Auditor-General concurred in this view of the importance of consumers, stating "*Because the project is mandatory, any potential benefits, and resultant price implications* ***make consumers significant stakeholders***" (emphasis added).

SSMA also agrees with the Auditor-General's assessment that the "*cost-benefit study behind the AMI decision was flawed and failed to offer a comprehensive view of the economic case for the project*". Moreover, we believe that the subsequent *Advanced Metering Infrastructure Cost Benefit Analysis* report, completed by Deloitte for the current government in 2011, deserves the same assessment. The Auditor-General stated that the previous cost-benefit study had "*failed to take into account the implications of the implementation risks, particularly risks from unproven technology"*. We believe Deloitte's 2011 report suffered from the same faults. As it is ultimately the Victorian public who are bearing the cost of the rollout, we find this unacceptable.

The lack of effective governance of the project by DEPI, resulting in industry interests prevailing over the interests of the Victorian public, has been a continuing thorn. The Auditor-General saw the lack of governance in the AMI rollout as being the result of the particular funding arrangements of the rollout; as the project has been supported by the power industry using a consumer cost recovery mechanism, and not funded by the state Budget, it hasn't undergone the automatic scrutiny normally accorded projects which have this degree of risk and expenditure.

SSMA believes that it is imperative that the government, as a matter of urgency, re-examines the economic viability of the AMI project and address its underlying assumptions as well as the risks which have emerged.

About Stop Smart Meters Australia

SSMA is part of a grassroots movement which has spread throughout all countries where power distributors and/or governments have sought to impose wireless 'smart' metering technology on its citizens. The movement in Australia originated in Victoria – the only state in Australia with a state-mandated rollout of wireless smart meters. SSMA is wholly staffed by volunteers. Stop Smart Meters Australia formally incorporated as an Association In April of 2013 in response to the continued refusal of the Victorian government to meaningfully engage with consumers. SSMA's legal purposes are:

1. *To support and assist people who are opposed to the forced rollout of smart meters on the grounds of health, privacy, security, safety and/or costs.*

2. To *educate the community on the negative aspects of smart meters.*

3. *To lobby on the negative aspects of smart meters and to advocate that their installation should be voluntary.*

Continuing lack of consumer engagement

The DPI stated, in an information session held the day after the government's announcement on 14th December 2011 that it was continuing with the rollout following its review, that the department was *'putting sharper focus on the consumer'*, and that *'consumers will be front and centre'* with a focus on *'consumer benefits'*. However, the underlying framework of the review, in addition to events subsequent to the review, gives the lie to these aspirations.

The Department of Treasury and Finance was given the responsibility for undertaking the review of the advanced metering infrastructure program in 2011 and provided an issues paper for public consultation in May of 2011. Unfortunately, consumer input appeared to be given scant consideration; interested respondents were only given three weeks in which to provide submissions, and *none* of the claimed 'around 400 submissions' received from the public were published. This is despite the fact that DTF's website had clearly specified that all submissions would become public documents available for others to read, and the fact that a number of members of the public retrospectively authorized their publication.

The DTF subsequently claimed that "*Many of these submissions contained information of a private and personal nature. Furthermore, in the process of reviewing these submissions it became apparent to DTF that many individuals were unaware that their submission was intended to be made public".* Unfortunately, simply 'blacking' out the offending details, as is a practice undertaken by other government departments, does not seem to be a strategy the DTF considered. This resulted in a review which failed to provide transparency and accountability, and, together with the brief period allowed for responses, gave the appearance of 'going through the motions' rather than being a serious examination of underlying issues.

The cavalier manner in which the government has continued to engage with consumers reinforces this observation. SSMA has a number of documented examples of prevailing Ministers refusing to meet with SSMA and other interested consumer advocacy groups who have wished to raise extremely serious concerns associated with the rollout. Requests for meetings have been refused, ignored or passed on by a number of Ministers, including the current Minister for Energy and Resources and the Minister for Health. Letters written by members of the public, raising detailed items of concern, have been responded to with generic template responses, which fail to address the issues raised. Other members of the public have been left waiting for over six months for a reply or have yet to receive a reply to letters. Some consumers have been shunted from department to department, with no single State or Federal government department prepared to take ownership of the issues which they have raised in association with the rollout (Steve 2013).

It appears that only lip-service has been given to recommendation 2 of the Auditor-General's report, which called for DPI to "*develop, appropriately resource and implement a stakeholder engagement plan with a particular focus on addressing consumer issues arising from the AMI project*". Instead, DPI appears to have

been complicit with the power distributors in engaging with consumers, in what has the semblance of a deliberate policy based on misinformation, obfuscation and deceptive practices.

Flawed cost-benefit studies

It is clear, from reading the Auditor-General's 2009 report, that the Victorian AMI rollout would never have been approved if due diligence had been given to earlier cost-benefit analysis. The report's recommendations called for DPI to "*re-assess the economic viability of the AMI project by updating the cost-benefit analysis to reflect existing and emerging risks as well as the impact of changes to scope and underlying assumptions*" and "*use the Department of Treasury and Finance's business case development guidelines and other advice to produce an updated cost-benefit analysis*".

Unfortunately, subsequent reliance on Deloitte's 2011 *Advanced Metering Infrastructure Cost Benefit Analysis* and the refusal of the DTF to give more than cursory consideration to the emerging financial issues which consumers had flagged in association with the rollout, also resulted in a flawed re-evaluation of the project's cost-benefits. Deloitte concluded that the rollout was going to result in an overall net COST (2008 Net Present Value) to electricity consumers of 319 million dollars (Deloitte 2011, p. 7). It was only by ignoring all of the costs which had already been sunk into the rollout that Deloitte were able to arrive at a net benefit to consumers in continuing with the rollout.

Deloitte stated that costs incurred by the Victorian government were NOT included in the analysis as most of these costs are *'passed onto taxpayers'* (Deloitte 2011, p. 40). Obviously, however, consumers and taxpayers are to a large extent one and the same group. It is therefore unclear what the effect would have been on the cost-analysis if these costs had been included.

Costs associated with increased radiofrequency irradiation of the population

More alarmingly, *no* recognition was given to emerging risks associated with the power distributors' decision to deploy wireless networks, which involves the forced irradiation of the Victorian population with pulsed radiofrequencies. The Auditor-General's comment that "*there has been insufficient analysis to fully understand potential perverse outcomes, risks, and unintended consequences for consumers*" appears prescient.

Although it is unlikely that the Auditor-General had in mind costs associated with adverse health outcomes, these have emerged as a very serious and growing problem for the community. Wherever in the world governments and/or power distributors have deployed wireless smart metering technology, as opposed to wired solutions, this has resulted in significant repercussions, in line with resulting elevated levels of electro-smog.

Written evidence submitted to the UK Parliament this year attested to the fact that the pulsed radiation from smart meters has resulted in thousands of health complaints world-wide. More than 10,000 health-related complaints were submitted to the California Public Utilities Commission alone, and included personal testimonies from medical doctors, psychotherapists and nurses regarding their own symptoms (Stop Smart Meters! 2013).

More than 150 Victorians have registered health complaints which they believe are associated with smart meters on SSMA's health register. This cohort is viewed as being the 'tip of the iceberg'. The majority of the population and medical fraternity in Victoria have no previous experience, nor training, in identifying

biological changes as a result of increased radiation exposure and are unlikely to link the rollout of AMI technology with the symptoms which have been triggered. The emissions from Victoria's smart meters appear to have caused the exacerbation of existing symptoms, as well as triggering new symptoms in parts of the population whom had not previously exhibited sensitivities to wireless technology.

The impact on people's lives has been profound in some cases, resulting in high personal costs for the people and their families, as well as the community. Outcomes which SSMA has been advised of include a number of cases where people have ceased employment as a direct result of smart meters, have undergone unnecessary medical procedures, have ended up being hospitalized, have outlaid many thousands of dollars to partially shield their homes from smart meter emissions, are no longer able to access parts of their homes and gardens, and the relocation of families interstate to escape the emissions. None of these are costs which have appeared in *any* of the cost-benefit studies endorsing the rollout.

Deloitte's report appeared to trivialize the above concerns, stating "*International experience suggests that small groups with interests in preventing the installation of smart meters can draw on this community uncertainty, particularly in regards to perceived concerns regarding the safety of smart meters and radio frequency (RF) radiation*" (Deloitte 2011, p. 52). The report reveals its bias towards industry interests in a subsequent statement which opines "*In our view, the concerns regarding RF radiation from smart meters are most troubling because of the potential ripple effect to the deployment of G4 cellular networks, RF based rural broadband networks and other future RF communications technologies*" (Deloitte 2011, p. 53). Rather than recommending research into the issues and establishing the facts of the matter, it appeared that Deloitte regarded community 'engagement' as an exercise in massaging information and controlling public perceptions.

Similarly, EMC Technologies' measurement site surveys, which were commissioned by the DPI and reported on in the *AMI Meter Electromagnetic Fields Survey*, appeared to have been primarily focused on comparing readings at a limited number of sites with the ARPANSA (Australian Radiation Protection and Nuclear Safety Agency) radiofrequency standard. Given that there is no consensus worldwide as to what is a 'safe' standard with, for instance, Australia's radiofrequency standard allowing its citizens to be irradiated with up to 10,000 times the radiation stipulated in Austrian's precautionary guidelines, the resulting readings did little to establish the safety or otherwise of Victoria's wireless smart meters. Testing was only performed at 16 sites and duty cycles were established through reliance on assumptions, with the actual number of transmissions only tested at seven individual meters for 'over one hour' (EMC Technologies, 2011, p. 22).

No consideration was given to how close individuals might already be to their thresholds for tolerance to radiofrequency exposure or to what extent wireless smart meter emissions would add to current exposure levels. Dr. Namkung, of the Health Services Agency of the County of Santa Cruz, stated in a 2012 report that '*exposure is additive and consumers may have already increased their exposures to radiofrequency radiation in the home through the voluntary use of wireless devices such as cell and cordless phones, personal digital assistants (PDAs), routers for internet access, home security systems, wireless baby surveillance (baby monitors) and other emerging devices. It would be impossible to know how close a consumer might be to their limit, making safety a uncertainty with the installation of a mandatory Smart Meter*' (Namkung 2012, p. 11). SSMA also concurs with her concluding remarks, where she stated '***there is no scientific data to determine if there is a safe RF exposure level regarding its non-thermal effects***' (Namkung 2012, p. 13, emphasis added).

There are a vast number of scientific studies, numbering in the thousands, pointing to very serious consequences as result of exposure to radiofrequencies. This research has been public for a very long time.

The U.S.A. Naval Medical Research Institute listed over 2000 studies in a report dated as early as 1972 giving evidence of adverse biological effects as a result of radiofrequency radiation (Glaser 1972).

Current research concurs, showing that adverse outcomes include DNA single strand and double strand breaks, breaching of the blood-brain barrier, increased production of heat-shock proteins and increased permeability of cell membranes. Not surprisingly, and similarly to the prolonged cover-up of other pollutants such as tobacco, it has been found that industry-funded studies only have a 30% likelihood of finding an adverse effect as compared to independent studies, where the likelihood is 70% (Ishisaka 2011).

Unfortunately, exposure also appears to be sensitizing increasing numbers of the public to *any* form of electromagnetic radiation. For instance, statistical modelling by Hallberg, an independent researcher, and Oberfeld, a medical doctor from the Austrian Department of Public Health, has indicated that up to 50% of the population will be electrically sensitive in the near future (Hallberg & Oberfeld 2006). If this occurs, it will have immense repercussions, both in terms of Victorians' well-being, and in terms of the financial implications of such an outcome.

Physicist Dr. Ronald Powell recently analysed wireless smart meter emissions, in light of the conclusions reached by the *BioInitiative 2012 Report*, which is a report compiled by 29 experts from ten countries which reviewed 1800 new scientific studies on non-ionizing radiation since the BioInitiative 2007 Report, (which had in turn reviewed over 2,000 studies ....BioInitiative Working Group 2012). He concluded that the power density at 100 metres from a smart meter is *higher than the power density that triggered biological effects in 6 of the 67 studies* which he considered. His analysis also showed that the RF power density from a smart meter does not drop down to the level of the RF exposure limits proposed by the *BioInitiative 2012 Report* until distances of *180 to 200 metres* from a smart meter are reached (Powell, 2013).

Electrohypersensitivity is already fully recognized in Sweden as a functional impairment, entitling sufferers to annual government disability subsidies (Johansson 2011). Shielding is also provided by councils in some instances (McLean 2011, p. 217). SSMA believes that provision should have been made by Deloitte for factoring the possible cost of these measures into long-term cost-benefit analysis.

Costs associated with damage to the environment

Dr Isaac Jamieson's review, *Smart Meters – Smarter Practices,* details a number of possible critical environmental effects from smart meter technology. These are based on research into effects of microwaves on vegetation, amphibians, birds and insects (Jamieson 2011, pp. 137-144). Effects include plant and tree die-off, drastic decline in wild amphibian populations and an increase in the number of deformed amphibians being found, reduced bird density in areas of increased field strength and increased bird aggression, and alteration in worker bees' behaviour and physiology. India's Ministry of Environment and Forests' 2011 *'Report on Possible Impacts of Communication Towers on Wildlife Including Birds and Bees'* triggered India's government, in 2012, to reduce its RF standard to one tenth of its previous exposure limits (Jayadevan 2012).

SSMA believes that cost-benefit analysis must consider the complete picture, and needs to factor in environmental costs.

Costs of accelerated corrosion as a result of wireless transmissions

Dr. Michrowski, of the Planetary Association for Clean Energy, states that "*There has been a significant increase in corrosion problems in the last few decades, parallel to the spread and implementation of wireless technologies. Whereas in the 1970s, only a small number of engineers consulted on corrosion problems, now a full quarter of all engineers in North America are experts in corrosion trying to resolve problems associated with building structures, water and oil and gas pipelines, fluid containers. How radiofrequencies affect corrosion can be verified by anyone who replaces a fluorescent compact bulb into a metallic fixture that once had an incandescent bulb. It takes only a few weeks to have the onset of paint coating corroding in lamp holders, followed by the steady eating away of metallic sheeting. Likewise, one can see which urban areas are exposed to elevated levels of microwave emissions: where sewer and telephone service covers rust – actually powder away rather than just coat themselves with oxidation, where fire hydrants crumble – even if installed within the previous 6 months - that is likely to be a zone subject to microwave emissions. Normally, such fittings last problem–free for decades. This is an effect of enormous burden to tax and rate-payers*" (Michrowski, p. 9).

Dr. Michrowski goes on to state that the problem is affecting rural communities as well, as the emissions are sometimes carried by "*power lines, ground currents, and rural electric distribution practices*".

He contends that environmental wireless pollution can also result in the compacting of quality soils, leading to water run-off, leading to insect invasions and adversely affecting crops.

SSMA believes a prudent cost-benefit analysis would make provision for the increased costs to the community of corrosion and soil degradation as a result of AMI technology.

Costs associated with increased vulnerability to EMP, HEMP, and non-nuclear EMP events

Wireless networks, which in turn rely on a host of computer-controlled infrastructure, are by their very nature considerably more vulnerable to solar electromagnetic pulse (EMP) events, man-made high altitude nuclear (HEMP) and non-nuclear EMP events than electro-mechanical devices and cabled networks. The UK House of Commons' Defence Committee views space weather as a global threat as a direct consequence of our vastly increased reliance on computer-based technology, with UK National Security classifying space weather as a Tier 1 risk (Stop Smart Meters Australia, 2012, p. 3).

SSMA believes the increased vulnerability of AMI technology should have been recognized in cost-benefit analysis.

Costs associated with increased vulnerability to hacking

Cyber experts have also pointed out the high vulnerability of wireless networks to hacking, to the extent that the entire grid could be shut down or destroyed by hackers, terrorists or foreign powers. SSMA believes weight needs to be given to this possibility. The Victorian government appears to be satisfied that there is little likelihood of such an event, but precedents of this nature are happening and the financial ramifications are severe.

Costs associated with advanced metering technology

The Auditor-General pointed out "*The extent of technology risks and their implications on the economic case for AMI were **significantly underestimated** in the advice provided to government that recommended commitment to the project*" (Victorian Auditor-General 2009, p.33, emphasis added).

Whilst Deloitte's subsequent cost-benefit study discussed costs of metering, as well as providing an overview of the communications technology, serious technological considerations appear to have been overlooked. For instance, Deloitte's discussion on the spectrum which was selected for the mesh networks (Deloitte 2011, p. 6) states that Silver Springs Network, who are the creator of AMI communications technology deployed by four of the Victorian distributors, "*selected an unlicensed part of the radio spectrum and shares that spectrum with other unlicensed devices like baby monitors, wireless phones, taxi dispatchers and others. Because of the very short messages sent by the meters, frequency regulators have allowed the SSN system to use more power than most other equipment in this unlicensed spectrum. That provides a longer range and fewer incorrect communications*" (Deloitte 2011, p. 35).

However, what the discussion omits to mention, is that as early as May 2011 the Australian Communication and Media Authority (ACMA) flagged the need to shift the smart meter communications used by CitiPower, Powercor, Jemena and United Energy (between 915 MHz to 928 MHz) to the 928 MHz to 933 MHz band due to overcrowding in the current segment, and the likelihood that smart meter communications will interfere with other users (ACMA 2011, p. 45). Jemena responded, stating if the move to the higher band was implemented, *'the change means that every meter deployed so far would require the internal radio to be re-tuned to the new frequency'* (Smith, 2013, p. 4). They also said that they didn't know whether this would involve a hardware or software change in the meter.

Clearly, there are a substantially increased number of variables at play in maintaining electronic meters and wireless communication networks as opposed to stand-alone electro-mechanical devices. Whilst ultimately it will always be the consumer who pays for these, SSMA believes it is remiss of any cost-benefit analysis not to provide for such contingencies.

To what degree has DEPI followed the Auditor-General's recommendations in regards to this risk? And how will the assurances from electricity distributors help consumers if they are proven to be wrong?

Specifically, the report called for DPI to:

• *Obtain assurance from Victoria's electricity distributors that their candidate technologies for AMI are capable of achieving the expected functionality and service specification prior to the further installation of these technologies in customer premises.*

• *Adopt the Department of Treasury and Finance's risk management guidelines as a basis for monitoring and managing the risks that threaten the economic viability of the AMI project.*

Smart meter benefits

The Auditor-General observed that the cost-benefit analysis was unclear about how consumers, in particular, would benefit from the smart meter program (Victorian Auditor-General 2009, p. ix). SSMA concurs; it appears the rollout has been driven by the needs of industry, rather than the community.

The rush to identify benefits for consumers, following the government's decision to proceed with the rollout appears, at best, to be marketing spin. Time-of-use pricing was rebadged as 'flexible' pricing. 'Time-of-use' pricing was the more accurate description. Those of our members who are already on so-called flexible pricing have become well aware that there is nothing 'flexible' about so-called flexible pricing.

DEPI's current website claims that "*smart meters empower customers to make choices about how much energy they use by providing accurate real-time information about electricity consumption*". As a *Frontier Economics Client Briefing* succinctly puts it, in response to COAG's energy reforms, which encourage the uptake of smart meters across Australia, this amounts to *'spending more to save less'* (Sood & Price 2012, p. 1).

Promotion of HANs, in conjunction with Home Display Units, is seen as a key benefit to consumers. DEPI's current website proclaims that with "*access to accurate and more detailed information, consumers will be able to see exactly how much extra electricity the heating in a new property will use, or how much extra energy a new television is using - rather than finding themselves with an enormous bill three months after the fact":* http://www.smartmeters.vic.gov.au/about-smart-meters The government seems to be oblivious to the fact that it has already been possible for consumers to obtain this information, albeit for one appliance at a time, through the purchase of inexpensive plug-in devices.

More worrying, is that promoting HANs means the government is advocating for increased microwave traffic within homes. This is particularly problematical, due to the increased unpredictability of wave movement, due to the likelihood of smooth surfaces (such as is found in kitchens) causing wave reflection and therefore increased field strengths (Smith 2013, p. 12).

Elsewhere in the world a number of authorities and institutions have taken a precautionary approach in regards to the use of wireless enabled devices. For instance, the French national library announced in 2007 that it was replacing all Wi-Fi connections with wired connections due to health issues (Bibliothèque Nationale de France 2008). Russia's peak radiation authority issued a statement in 2012 warning against children's exposure to wireless emissions in kindergartens and schools (Russian National Committee on Non-Ionizing Radiation Protection 2012) as their bodies are at particular risk of absorbing radiation.

SSMA believes that provision needs to be made for the cost of adverse health outcomes, as a result of the uptake of HANs, in order to more accurately reflect their role in generating increased microwave traffic within homes, small business and schools.

Benefits of energy conservation as a result of AMI

SSMA believes energy conservation is a contentious item to incorporate into cost-benefit analysis, given the conflicting results given by studies. For instance, a report produced by the University of Melbourne contended that "*Time-of-use tariffs have had only very modest success in eliciting demand side responses in trials both overseas and in Australia. In California, for example, TOU tariffs achieved only a 4.71% reduction in peak demand in a state-wide pilot during the summer months, while* ***overall consumption actually increased.*** *Moreover, the impact of TOU on consumers' energy loads waned overtime, with TOU tariffs eliciting* ***only a 0.6% reduction in peak demand*** *towards the end of the trial'* (McGann & Moss 2010, p. 62, emphasis added).

Conclusion

SSMA calls on Parliament, as a matter of urgency, to undertake a reassessment of the AMI rollout. With the conclusion of the mandate, and the crystallization of a number of risks which had not previously been addressed, SSMA believes it is imperative that this occurs. SSMA would welcome the opportunity to be of assistance in this matter. We have seen first-hand, the devastating consequences which the mandate to install smart meters has had on the Victorian community.

The Council of Europe stated in 2011 in its resolution on the potential dangers of electromagnetic fields and their effect on the environment that '*waiting for high levels of scientific and clinical proof before taking action to prevent well-known risks can lead to very high health and economic costs, as was the case with asbestos, leaded petrol and tobacco'* (Council of Europe 2011).

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