

Digital metering data collection and management policy

Customer, Community and Strategy, February 2026

Responsible group or department	
Document Owner	General Manager, Customer, Community and Strategy
Approved by	Managing Director, Barwon Regional Water Corporation
Compliance	Barwon Water
First created	February 2026
Updated	-
Next review	February 2027
Document Review Cycle	12 Months
Version	V21.0
ECM Reference	A36627677

1.1 Revision History

Version	Date	Contact	Description of Amendments	Communication Method
1.0	22, August 2025	Smart Networks, Subject Matter Expert	Document creation to align with Legislation obligations and business compliance requirements.	Email
2.0-19.0	22, October 2025 – 10, February 2026	Smart Networks, Campaign Advisor	Refine wording in line with recommendations from the Draft and Consult phase of the Policy Governance Framework	Email
19.0	16, February 2026	General Manager, Customer, Community and Strategy	Approval	Email / ECM
20.0	2, February 2026	Managing Director	Approval	Email / ECM
21.0	3, February 2026	Smart Networks, Campaign Advisor	Finalise revision history	Email / ECM

1 Policy Statement

This policy states the principles and practices governing the collection, storage, and use of data obtained from digital water meters and data loggers installed at customer properties. This policy ensures transparency, accountability, and responsible data management in alignment with relevant privacy and data protection regulations.

2 Scope

This Policy applies to the data Barwon Water collects from digital water meters and data loggers installed at customer properties.

Barwon Water installs a water meter at every eligible property connected to our water network to measure the volume of water supplied or discharged. These measurements are primarily used for billing customer water use.

Currently, most Barwon Water customers have a mechanical water meter installed on their property. Mechanical meters require readings to be taken manually to record water usage for each billing period, usually once every three months.

References in this Policy to digital meters should also be read as inclusive of data loggers fitted to mechanical meters. Digital loggers record water usage at the mechanical meter and communicate the usage data to Barwon Water's digital platform. Barwon Water may install data loggers on properties for a range of operational requirements, including, but not limited to: facilitating remote access for meters located in areas of restricted accessibility; and for the measurement of water supplied to or discharged from customers subject to trade waste agreements or commercial arrangements.

To access water usage data more easily, Barwon Water is rolling out digital meters throughout the network. Over the coming years, digital meters will be installed and will replace nearly all mechanical meters at existing properties.

Digital meters have the ability to transmit water usage data that may enable Barwon Water to provide customers with interval usage data insights. Data captured and transmitted also allows Barwon Water to detect and notify customers of potential leaks, reducing water usage and saving customers money on their bills as well as avoiding bill shock. The functionality enables Barwon Water to draw more meaningful insights about water use and water loss in the network. This aids timely action to repair leaks and to drive informed decision making about services and maintenance.

As the rollout of digital meters scales up, more and more customers will be upgraded to a digital meter. Customers who wish to keep their existing mechanical meter may apply to opt-

out of receiving a digital meter, subject to Barwon Water approval. If a customer elects to opt-out, they will not have access to the benefits offered by the new functionalities of digital meters.

3 Purpose

Barwon Water has issued this policy to manage how we use data collected from digital water meters installed at customers' properties.

This Policy has been written in accordance with clause 5.3 of the Water Industry Standard – Urban Customer Service (July 2023).

4 Definitions

Term	Description
digital water meter	A digital water meter is a device that measures water supply amongst other attributes about the meter and the water network (depending on the sensors contained within the meter) and transmits that data electronically to a water utility.
occupier	Occupier means a person in occupation of a property to which a service is available, including: <ol style="list-style-type: none"> 1) a tenant or caravan park resident registered as such with the water business, for the period of such registration; or 2) the property owner who is occupying the site.
data logger	A device designed to affix to a mechanical water meter that measures water supplied to or discharged and transmits that data electronically to an authorised data platform. A data logger may only provide minimal data when compared with a digital water meter.
continuous flow alerts	A type of alert created when a digital water meter detects an ongoing constant flow of water, which could indicate a leak at the customer's site. These alerts are distinct from high-usage leak alerts.
unique device ID	Unique Device Identification (UDI) is a system for identifying devices, analogous to a serial number. This ID allows utilities to accurately track usage data associated with a specific meter.
raw data	In this document is defined as data sourced at, and transmitted from the digital meter or data logger.
Interval usage data	Has the same meaning as for 6.1 below

Acronym	Definition
ESC	Essential Services Commission
NB-IoT	Narrowband Internet of Things is a low power wide area telecommunication network specifically for Internet of Things devices.

SIM	Subscriber Identity Module is a smart card chip specialised for use in communication devices such as a mobile phone or digital meter/logger
-----	---

5 Digital Meters

5.1 What is a digital meter?

Digital meters perform the same main function as mechanical meters, which is to measure the amount of water supplied to or discharged from a property for billing purposes.

However, they also incorporate communications technology that allows for this information to be wirelessly transmitted to Barwon Water rather than needing to be manually read.

Additionally, the technology in digital meters records and transmits other flow, network and meter performance data which can be used to provide and improve Barwon Water's services.

In some cases, such as with many large business customers (ie. utilising larger pipe and meter size), rather than installing a digital meter, a data logger is affixed to an existing large mechanical meter. Data loggers function similarly to digital meters in that they record interval water usage data (interval usage data) over time. However, they may provide less detailed data and may operate using different mechanisms, depending on the device type and application.

5.2 How do digital meters work?

Digital meters communicate with Barwon Water in a way that is similar to a mobile phone. They contain a SIM chip and transmit data using 'Narrowband Internet of Things' (NB-IoT) technology. The digital meter transmits data to the telco network via a secure channel, and the telco network then transmits the data to Barwon Water. All transmissions are encrypted in transit.

Digital meters do not contain information that identifies an individual customer, such as a customer's name or address. Each digital meter is allocated a unique device ID, similar to a serial number. The data recorded by the meter is linked to the device ID. When a digital meter is installed at a property, the unique device ID is linked in Barwon Water's system to the property address. On receipt of the data transmitted from the digital meters in Barwon Water's systems secure processes automatically match the raw data to the associated property and then to the customer account(s) linked to that property.

Digital meters are battery powered and will continue to operate if there is an electrical power outage. However, if a telecommunication outage occurs, which happens from time to time, digital meters have the capacity to continue recording, retaining as a minimum, the latest (rolling) 10 days of data logged. This is then transmitted to an authorised data platform once

communication is restored. (ie. as a minimum the most recent 10 days of data is sent when the communication is restored.)

6 Data

6.1 What data does Barwon Water collect from digital meters?

Barwon Water collects the following data from digital meters:

Data	Description
Raw Data	Raw data collected and sent by a digital meter includes: <ul style="list-style-type: none"> • registered read data • interval usage data • water sensor data • the meter number • meter status
Registered Read	The register on a water meter is the total amount of water that has been used at a property (ie. passed through the meter) since the meter was installed. A reading of the total volume of water recorded through the meter may be taken any time from a water meter but is typically taken at regular scheduled intervals for billing purposes.
Interval Usage Data	Amount of water supplied to or discharged from a property during a particular interval (recorded every 30 minutes, configurable down to 5 minutes).
Water Sensor Data	Some digital meters may be equipped with integrated sensors that monitor various parameters within the water network. These may include, but are not limited to: <ul style="list-style-type: none"> • water temperature • pipe vibration • water pressure
Alarms and Notifications	Data from digital meters can be managed via a IoT platform to provide alarms & notifications to Barwon Water about issues, including but not limited to: <ul style="list-style-type: none"> • Continuous flow • Battery status • Time synchronisation • Vibration (if sensor is fitted) • Pressure (if sensor is fitted) • Empty pipe • Tamper • Temperature • Reverse flow

6.2 How does Barwon Water use and disclose data?

Barwon Water uses and discloses data collected from digital meters to conduct and improve its business activities. Data collected from digital meters is primarily used for the purposes set out below:

Data	Use
Raw Data	Raw data (from the meter/logger) can be collected, stored and combined with other information such as a service address to determine if and how much water is supplied to a customer's property.
Registered Read	A registered read is used to determine a property's water usage for a billing period. The difference between the register read at the end of one billing period and the register read at the end of the next (approximately 90 days) is the water usage on a customer's bill.
Interval Usage Data	Interval usage data may be used by Barwon Water to enhance customer service by: <ul style="list-style-type: none"> • Informing the creation of alarms and notifications such as 'continuous flow' alerts which indicate potential water leaks on customer properties • Aggregating data of the water usage patterns throughout the network to indicate potential leaks in the network. • Informing targeted programs of ways they could support customers to reduce their water usage. • Assisting a customer with a billing enquiry by providing them with up to date water usage data. • Undertaking research, studies and analytics relating to Barwon Water's functions (e.g. demand forecasting, water-usage and water-savings behaviour change, asset planning model validation and other necessary functions)
Water Sensor Data	Water Sensor Data is utilised in support of proactive and responsive network management and maintenance, including: <ul style="list-style-type: none"> • Enabling remote monitoring of aggregate water network performance • Monitoring indicators of potential individual leaks in the water network, including pipe vibration, and water pressure fluctuations • Providing the data inputs for alarms and notifications as configured via IoT platforms.
Alarms and Notifications	Data from digital meters is configured and managed via an authorised IoT platform to create alarms and notifications that enhance service delivery and network reliability by: <ul style="list-style-type: none"> • Providing customer with services such as potential leak alerts • Monitoring the performance and status of digital meters, and • Identifying faults and supporting emergency responses to faults or variables within the water network

6.2.1 Aggregation and de-identification of personal information

Data collected from digital meters for purposes other than assisting customers with water usage, faults, alarms and notifications directly relating to their property must be aggregated across multiple customer/properties, or de-identified prior to disclosure.

Raw data obtained from digital meters in isolation is not personal information. Data has the potential to become personal information if used in combination with other contextual

information. In such cases, that information will be managed in accordance with the privacy practices set out in Barwon Water's Privacy Charter.

6.2.2 Disclosure to third parties

Barwon Water often engages or collaborates with third parties for the purposes described above. Digital meter data may therefore be disclosed to contractors, consultants, universities, industry bodies, research institutions and government bodies in connection with these purposes so long as it is de-identified or used in aggregate and does not disclose personal information without the express consent of affected individuals.

6.2.3 Potential leak notifications, interval usage data and disclosure to landlords

Due to the way customers are billed, access to water usage information varies depending on the nature of a tenancy, its occupiers and landlord.

6.2.3.1 Residential tenancies:

6.2.3.1.1 Interval usage data

- If a customer is registered as a residential tenant (financially responsible for water usage at the property) their landlord will not be permitted to see the customer's Interval Usage Data.
- If the landlord receives the bill for both service charges and water usage at the property a customer is occupying, the water bills sent to the landlord will include the Register Read recorded to calculate the usage for that bill.
- If the landlord is financially responsible for both service and water usage charges, then they may also be permitted to see the interval usage data. For example if the landlord has been provided access to a customer portal application provided by an authorised third party on behalf of Barwon Water.

6.2.3.1.2 Potential leak alerts

- If a customer is a registered tenant, Barwon Water will notify both the tenant **and** their landlord if a potential leak is detected at the property.
- Barwon Water may inform the landlord of the potential size of the leak, but will not share Interval Usage Data with them. This is done to provide the landlord the opportunity to investigate and promptly repair the leak.
- If an occupier is not a registered tenant at a property, only the financially responsible customer (landlord) will receive notifications about potential leaks at the property they are occupying.

6.2.3.2 Commercial tenancies:

6.2.3.2.1 Interval Usage data

- If a commercial tenant is nominated to pay usage charges as per the process outlined in the Barwon Water Billing and Collection Policy, the commercial property's owner may also be able to see interval usage data.

- If the commercial property's owner is responsible for both service and water usage charges, then the water bills sent to the commercial property's owner will include the Register Read recorded for the billing period to calculate the usage for that bill.
- If the commercial property's owner is responsible for both service and water usage charges, then they may also be able to see the interval usage data. For example if the landlord has been provided access to a customer portal application provided by an authorised third party on behalf of Barwon Water.

6.2.3.2.2 Potential leak alerts

- If a customer is a registered tenant, Barwon Water will notify both the customer and their landlord if a potential leak is detected at the property.
- Barwon Water will notify a commercial landlord if a potential leak is detected at their property. This is done to give them the opportunity to investigate and promptly repair the leak.

6.3 Data Retention

Data transmitted by digital meters is collected and stored in accordance with applicable legislation and any specific terms of service agreed upon with Barwon Water and authorised third-party systems. This policy is to be read in conjunction with nested and authorised third-party policies that outline how they collect, manage and protect data. All third parties who store or use data collected by Barwon Water digital meters will meet cybersecurity and Technical Design Authority requirements.

Barwon Water stores raw data in the form it was collected, in a de-identified format indefinitely. It is stored securely and kept as a historical reference for use in connection with the purposes described in this Policy.

6.4 Access

Customers who receive water usage charges will see their billable Register Reads on each water bill.

Customers with a digital meter who have registered for access to either a Barwon Water or authorised third-party customer portal application can see their water Interval Usage Data. This data can help customers to understand their usage patterns and improve their water saving behaviours.

6.4.1 Access to usage (Register Read) history

A customer may access their register read usage data for the preceding three years in accordance with the Billing History terms in the Barwon Water [Customer Charter](#).

Please note that due to some physical plumbing configurations and vulnerable customer policies; some customers will not be permitted to gain access to their registered read data. This is to preserve customer privacy or safety in accordance with the information handling procedures in Barwon Water's Domestic and Family Violence Policy.

A customer may request access to the registered read data from more than three years ago by contacting Barwon Water, who may impose a reasonable charge in accordance with the relevant Public Records Office Standard General Disposal Schedule for the Records of Water Authorities.

7 Privacy

Raw data obtained from digital meters in isolation is not personal information. However where the data can be linked to an identifiable individual or household, it may be subject to privacy protections. In these circumstances, to the extent that the data constitutes personal information or personally identifiable information, it is managed in accordance with the privacy practices set out in Barwon Water's [Privacy Charter](#).

All authorised third parties who store or use data collected by digital meters are subject to Barwon Water cybersecurity, technical design and privacy requirements.

The collection, use and disclosure of Personal Information, is regulated by the Information Privacy Principles as defined under the Privacy and Data Protection Act 2014 (Vic) ('the PDP Act'), and by Barwon Water's Privacy Policy and Customer Charter. These documents are amended from time to time as required.

More information about privacy rights is available at the Office of the Victorian Information Commissioner's website, <http://www.ovic.vic.gov.au> and at the Privacy Commissioner's website <http://www.privacy.gov.au>.

8 References

Related Barwon Water Policies and documents:

Tier	Description
5	Customer Charter
1	Domestic and Family Violence Policy
1	Privacy Policy
5	Privacy Charter
1	GreenBe Privacy Policy
5	GreenBe Terms of Use
-	Iota eServices Agreement
1	Billing and Collection Policy

8.1 Resources

Title
Privacy and Data Protection Act 2014 (Vic)
Public Records Act 1973 (Vic)

Water Act 1989 (Vic)
Water (Estimation, Supply and Sewerage) Regulations 2014 (Vic)
Water Industry Standard – Urban Customer Service (July 2023)

9 Review

In accordance with the Barwon Water [document hierarchy](#), this Policy will be reviewed 12 months from the date of issue. However, any document may be reviewed at any time if required, including due to a change in legislation or as business operations change.