



14 June 2018

Jenessa Rabone  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Dear Jenessa

**Re: ESTIMATED METER READS CONSULTATION PAPER - ERC0241**

CitiPower, Powercor and United Energy welcome the opportunity to respond to Australian Energy Market Commission's (AEMC) consultation report on estimated meter reads.

We support the use of estimated meter reads where an actual read is not available in more than a month. The cost of obtaining manual actual meter reads monthly would outweigh the benefit of bill accuracy. In extreme cases where an estimate is unfeasible or impractical, customers should have the opportunity to provide self-reads to reduce the likelihood of 'bill shock'. However, **customer self-reads should be limited to non-interval meters to reduce confusion and meter read error.**

Interval meters are commonly referred to as 'smart meters'. More than 97% of Victorian customers have smart meters that provide 30-minute interval data. There are a number of models of smart meters currently installed across the state, with various technical specifications.

More than 99% of smart meters are remotely read, with a small number manually read by metering experts. There are a number of complications and complexities involved in manually reading these meters, including:

- smart meters have numerous controls and screens displaying various data, including data on usage, voltage and currents, with the number of controls and displays varying across models
- system updates may temporarily reset usage displays to zero, while correctly capturing data in the database
- a manual read would require multiple interval data reads for customers with time-of-use tariffs.

On rare occasions where an estimated read is required due to short interruptions to meter communications, the closest interval read is used. This method has improved the overall accuracy of estimated reads.

If customers were to self-read smart meters, the above mentioned complexities would likely lead to confusion and errors, which would increase the need for customer relationship management and error rectification. The increased cost of customer management and error rectification would far outweigh the benefit of customer self-reads on rare occasions where an estimated read is required. We therefore propose customers' expectations are managed by limiting the opportunity to conduct a self-read to non-interval meters.

Should you have any queries about this letter please do not hesitate to contact Sonja Lekovic on (03) 9683 4784 or [slekovic@powercor.com.au](mailto:slekovic@powercor.com.au).

Yours sincerely,

Brent Cleeve  
**Head of Regulation, CitiPower, Powercor and United Energy**