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Australian Energy Market Commission  
By online lodgement

**ERC0241**

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**Subject: Response to Esitmated Meter Reads Consultation Paper**

Redback Technologies is a technology company focused on the development of advanced, low cost solar solutions for residential and commercial users. Redback's streamlined inverter hardware and proprietary cloud based system puts power back in the hands of consumers with the ability to analyse and control energy generation and consumption in real time, giving our consumers the ability to reduce energy costs, without sacrificing comfort.

We support changes which address unnecessarily higher bills resulting from poor estimation of energy usage, particularly where alternative, reliable sources of measurement are available. We also support incentives for more accurate meter data being used where possible and more customer choice in terms of billing and information.

As the Commission notes, it may take a number of years, and possibly decades, for the existing type 5 and 6 meters to be completely replaced as a consequence of the competition in metering rule. In the meantime, these meters will continue to be manually read. The Commission is also most likely aware of a range of products entering the market, including Redback smart inverters which have capability to record and communicate energy usage.

Such new technologies are rarely used by meter data providers or retailers for use as estimates, but offer value to the market, particularly where they allow for more regular billing or reliable estimates of energy use, and an easier alternative to customers physically recording the meter output and manually sending to meter data providers or retailers.

Redback believes the Rule would be enhanced if the definition of self-reads included energy use data provided by third party sources independently of the customer but with the customer's consent.

Yours sincerely

Brendon Crown  
Director of Market Development