



Our ref: IRF18/3104  
Your ref: ERC0236

Mr John Pierce  
Chairman, Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Submitted online

Dear Mr Pierce

Thank you for the opportunity to provide a submission to the assessment of the rule change requests concerning metering installation timeframes. The successful roll-out of digital meters is an important step towards giving customers tools to make choices about how they interact with the electricity market and reduce their electricity bills.

It is therefore important to ensure that customer service from retailers and metering providers is of the highest standard. The regulatory regime for metering should underpin consumer confidence in the market.

As you may be aware, the Energy and Water Ombudsman NSW (EWON) is the independent resolution organisation for customers in NSW. Our understanding is that over 750 complaints relating to meter installation issues have been made to EWON since the implementation of reforms on 1 December 2017 in which all metering responsibilities were transferred to retailers. In NSW retailers have been able to organise the installation of meters since 1 July 2016 for a smaller set of customers

Customer service is a high priority for the NSW Government. This is evidenced by the recent request from the Hon Don Harwin MLC, Minister for Energy and Utilities to the Independent Pricing and Regulatory Tribunal (IPART) to report on the roll-out of digital meters as part of its annual market monitoring review.

IPART is currently doing a survey of consumer experiences, and will publish its draft report in September 2018. We ask that the AEMC coordinate with IPART, so that IPART's findings can have an input into the draft rule change determination.

It would be beneficial, if the AEMC's rule change process could also consider what other options are available to improve the customer experience.

In particular, rural and remote customers can face challenges having basic supply restored if they are solely reliant on their retailer. This is because a customer without power may be refused assistance from the distributor, even where a representative from the distributor is on site and can replace a meter thereby restoring supply, because the distributor is prevented from restoring supply due to the nature of the outage and the application of the Ringfencing Guideline alongside requirements relating to provision of metering in the rules.

In developing the draft determination, one option the AEMC could evaluate would be to allow distributors to provide necessary metering and connection activities, if timely work through the competitive retail market was not possible due to distance or other factors.

Should you have any questions in relation to this matter, please contact Katharine Hole, Executive Director Energy Strategy at the Department on 8229 2848.

I trust this information is of assistance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Liz Develin', with a long horizontal flourish extending to the right.

**Dr Liz Develin**  
**Deputy Secretary**  
**Energy, Water and Portfolio Strategy**