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Australia Energy Markets Commission (AEMC)
PO Box A2449
Sydney South NSW 1235
via online submission

To whom it may concern;

Draft rule determination - ERC0241:

- **National Electricity Amendment (Estimated meter reads) Rule 2018**
- **National Gas Amendment (Estimated meter reads) Rule 2018**
- **National Energy Retail Amendment (Estimated meter reads) Rule 2018**

Thank you for the opportunity to comment on the AEMC's preferable draft rule (draft rule) that amends the National Energy Retail Rules (NERR) to provide customers with a process to request an adjustment to an estimated bill by providing their own reading of the electricity or gas meter.

Australian Gas Infrastructure Group (AGIG) is one of Australia's largest gas infrastructure businesses. Our assets include gas distribution networks¹, gas transmission pipelines and gas storage facilities located in most states and territories in Australia. AGIG has around 2 million customers across every mainland state and the Northern Territory.

We are supportive of the AEMC's overall approach to customer self-reads. In particular, AGIG supports the following elements from the draft rule:

- 1 retailers to inform small customers of their right to request an adjustment to an estimated bill using their own meter reading;
- 2 retailers to provide guidance to small customers on how to read their meter and accepted methods by which they can lodge a customer self-read;
- 3 enables a customer to submit their own reading of the meter if they consider the estimated bill is based on an inaccurate estimate;
- 4 retailers to adjust the customer's bill based on the customer self-read, as long as it complies with the retailer's requirements (for example, the customer self-read must be clear and provided before the due date for payment of the existing estimated bill);
- 5 retailers must promptly notify the customer where a customer self-read has not been accepted and explain to the customer the reason(s) for not accepting the read and the complaints and dispute resolution processes available;
- 6 that the draft rule is not prescriptive in the processes to be adopted by retailers to comply with the draft rule;
- 7 metering parties and distributors are not required to use customer self-reads for market settlement purposes, although it does not preclude their use where this is allowed by the Australian Energy Market Operator's (AEMO's) Retail Market Procedures;
- 8 continues to permit the use of estimated meter reads where an actual read cannot be obtained; and

¹ Australian Gas Networks (AGN) and Multinet Gas Networks (Multinet)

- ⁹ customers to pay the retailer for the cost of the meter test or check reading only after the review has been completed and only if the meter proves not to be faulty or the meter data is correct.

We support stakeholder comments regarding the need to address chronic access issues and that consideration should be given to the installation of gas meters that have the capability to be read remotely. The AEMC responded to AGL's comments and stated:

"the Commission is supportive of any industry attempts to minimise the problem of inaccurate estimations, including installing analogue gas meters where they are appropriate."²

In the recent Multinet Gas Access Arrangement for the 2018-22 Access Arrangement Period Multinet proposed a 'Digital Gas Metering Pilot Study' to trial 10,000 digital gas meters.³ The business case highlighted a number of the potential benefits including the elimination of estimated meter reads, more flexibility and information for customers. Multinet received support for the project as part of its customer engagement program and Origin Energy also supported the trial of remotely read gas meters.⁴ The AER rejected the proposal as they found limited benefits.⁵

We continuously endeavour to improve the accuracy of meter reading activities in receipt of actual meter reads. This is evidenced by our current practice to accept customer self-reads in the AGN networks as explained in the earlier AGIG submission.⁶ We echo AGL's comments that not all customers have supported the introduction of customer self-reads with a small number commenting that they will not "do your work" to read the meter.⁷ Overall, we have received very positive responses to the initiative as many customers do not want to leave their property exposed (including unlocked) when they are not at home.

AGIG also supports ERM comments that customers are unaware of their obligations to provide safe and unhindered access to meters at all time.⁸ We have also found that customers are confused with their relationship with retailers and gas distributors, which is also contributing to the frustration on the part of customers regarding who they should contact. We would support further clear communications to customers to educate them on their responsibilities as improved site access will see a reduction in estimate reads for customers.

Once again we would like to thank the AEMC for the opportunity to comment on the estimated meter reads draft rule. Should you require any additional information please contact either Vicky Knighton (08 8418 1135) or myself (08 8418 1129) if you would like to discuss this submission further.

Yours sincerely



Craig de Laine
General Manager People and Strategy

² AEMC 2018, *Draft rule determination - Estimated meter reads*, 9 August 2018, page 41.

³ Multinet Gas, 13.11.2 – Capital Expenditure Overview - Digital Gas Metering Pilot Study, 15 December 2016.

⁴ Origin Energy 2017, Victorian gas access arrangement review 2018–22 – Response to gas distribution businesses' proposals, 10 March 2017, Page 4.

⁵ AER 2017, *Draft Decision Multinet Gas Access arrangement 2018 to 2022, Attachment 6 – Capital expenditure*, July 2017, Page 23.

⁶ AGIG 2018, *Submission of the Rule Change Consultation Paper*, 15 June 2018, page 1.

⁷ AGL 2018, *Submission of the AEMC Consultation – National Energy Retail Amendment (Estimated meter reads) Rule 2018*, 14 June 2018, page 4.

⁸ ERM Business Energy 2018, *ERC0241 Estimated meter reads, Consultation Paper*, AEMC, 17 May 2018, 15 June 2018, page 1.