

20 September 2018



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

Dear Mr Pierce

AEMC Draft Rule Determination Estimated Meter Reads (ERC0241)

Origin Energy (Origin) appreciates the opportunity to respond to the Australian Energy Market Commission's (AEMC) draft rule regarding estimated meter reads.

Origin broadly supports the AEMC's draft rule and considers it a pragmatic decision that will benefit customers.

The draft rule proposes new requirements be placed on retailers to adjust an estimated bill based on a customer's reading of their meter. We agree that this is the most effective means to reduce the adverse effects experienced by consumers as a result of inaccurate bills.

Origin supports the AEMC's decision to provide retailers with flexibility to determine how best to communicate with customers and the process to obtain a self-read. This approach will reduce the costs of implementation and enable retailers to provide more tailored solutions to customers. However, we note that clause 3D of the draft rule requires that when a retailer does not accept a customer self-read, a retailer must promptly notify the customer in writing of the reasons for its decision.

In some cases, the preferred model for the customer is to provide their self-read over the phone. During this process, when an anomaly with a self-read is identified it is raised with the customer at the time of the call with the view of resolving the matter there and then. The requirement for a retailer to provide a response in writing could duplicate the messaging and unnecessarily delay the resolution of the issue. Removing the ability of customers to engage with retailers using a customer's preferred means of communication (in this case phone) has the potential to delay an adjusted bill being issued and diminish the customer experience.

For these reasons, we propose that where a customer's preferred means of communication is the phone, that retailers are permitted to provide a reason for not accepting the self-read to the customer verbally provided that they keep an auditable register of the phone conversation.

The draft rule applies to all types of electricity and gas metering arrangements for small customers. However, while it may apply to all meters we believe self-reads are not applicable for all tariff offerings. For example, where a customer is on a time of use tariff, the customer will not be able to access 30-minute interval usage data; only cumulative usage is observable without a probe and correct apparatus. For this reason, self reads should only apply to customers on tariffs that are supported by cumulative usage reads.

If you have any questions regarding this submission, please contact Sean Greenup in the first instance on (07) 3867 0620.

Yours sincerely

A handwritten signature in blue ink that reads "K. Robertson".

Keith Robertson
General Manager, Regulatory Policy
keith.robertson@originenergy.com.au