

19 September 2018

Mr John Pierce
Chair
Australian Energy Market Commission
PO BOX A2449
Sydney South NSW 1235

Via online submission

Dear Mr Pierce,

RE ERC0241 – National Electricity Amendment (Estimated meter reads) Rule 2018

TasNetworks welcomes the opportunity to make a submission to the Australian Energy Market Commission (**AEMC**) on the National Electricity Amendment (Estimated meter reads) Rule 2018 Draft Determination.

As the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and jurisdictional planner in Tasmania, TasNetworks is focused on delivering safe and reliable electricity network services while achieving the lowest sustainable prices for Tasmanian customers. This requires the prudent, safe and efficient management and development of the Tasmanian power system. In this regard, TasNetworks is supportive of AEMC's efforts to clarify and improve customer outcomes from the use of estimated meter reading.

TasNetworks supports the draft determination which has captured an appropriate balance between customer protections and retailer regulatory obligations. Allowing customers to provide estimated meter reads will allow customers to better match their behavioural consumption patterns with the bills they receive, thereby avoiding bill shock and any unnecessary financial hardship. It will also reduce the number of disputes arising from estimated reads. This will result in efficiency savings for retailers which should ultimately lower retail electricity prices for all customers.

TasNetworks also supports the enhanced customer protections in the draft rules. The introduction of civil penalties for retailers, access to the ombudsman for customers and greater clarity on the use and bases of estimated reads, can only improve the metering and billing process.

In the same manner, TasNetworks applauds the AEMC for adopting TasNetworks suggestion that the cost of who pays for metering testing will only be decided after the testing has been completed. This means customers will only need to pay for the cost of testing if the meter data is found to be correct, or if the meter is found to be working correctly. This change more fairly balances the initial costs of billing disputes and removes the disincentive for customers to challenge a reading.

TasNetworks endorses the flexibility retailers have been allowed in designing their own approach to using self-reads for billing purposes. Allowing retailers to determine what they accept as a self-read should help minimise implementation costs. At the same time, in providing clarity on reasonable grounds for rejection of self-reads, and the obligation for retailers to notify customers of a rejected read, the draft rules provide requisite protections to customers. This should lead to a more efficient and less disputed billing process.

TasNetworks notes that the draft rule does not include a requirement on metering parties or distributors to use customer self-reads for market settlement purposes. However, the draft rule does not preclude self-reads from being used for market settlement where this is allowed by AEMO metrology and retail market procedures. TasNetworks supports the flexibility provided by this approach.

TasNetworks would welcome the opportunity to discuss this submission further with you. Should you have any questions, please contact Bradley Woods, Acting Team Leader NEM Strategy and Compliance, via email (bradley.woods@tasnetworks.com.au) or by phone on (03) 6271 6187.

Yours sincerely,



Kirstan Wilding
Leader Regulation