



16 October 2018

Ms Anne Pearson  
Chief Executive  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Dear Anne

**AEMC Reference ERC0236 – Metering Installation Timeframes**

Thank you for the opportunity to comment on the draft rule determination for the Metering Installation Timeframes, 13 September 2018.

The Energy & Water Ombudsman NSW (EWON) investigates and resolves complaints from customers of electricity and gas providers in NSW, and some water providers. Our comments are informed by our investigations into these complaints, and from our community outreach and stakeholder engagement activities.

In our initial submission, we detailed a trend, over a six-month period, of an increase in complaints from customers concerning the installation of digital meters by retailers.

Our most recent data demonstrates that EWON continues to receive complaints related to digital meters as detailed in Table 1.

**Table 1 Digital Meter complaints July – September 2018**

	July	August	September
Complaints received	226	235	202

Table 2 provides a breakdown of complaints relating to delays in installation with new connection delays shown separately.

**Table 2 Digital Meter (DM) Delay Complaints July – September 2018**

	All Digital Meter Complaints	Installation Delay Complaints		New Connection Delay Complaints	
July	226	110	48.7%	32	14.2%
August	235	114	48.5%	31	13.2%
September	202	107	53.0%	32	15.8%

This data demonstrates that the number of customers complaining about meter installation delays remains steady both in number and as a percentage. The overall number of customers complaining about new connections, while decreasing slightly, remains high.

This continues to support our view that retailers are not yet taking ownership of their new responsibilities.

EWON strongly supports the proposal to introduce fixed timeframes into the rules, however we still have some concerns about the draft rule.

### Replacement time for malfunctioning meters

The AEMC proposes that retailers will be required to provide a meter installation for a new connection or a simple meter exchange on a date agreed with the customer. If no date can be agreed, then the retailer will be subject to a maximum timeframe of six business days for a new connection or 15 business days for a simple meter exchange.

We are concerned with the new clause 7.8.10(aa) of the NER which extends the timeframe for replacing a malfunctioning meter from 10 to 15 business days after the metering coordinator has been notified. In circumstances where a malfunctioning meter leaves a customer without supply, extending this timeframe will be detrimental.

In its draft determination, the AEMC stated:

*“The Commission is not aware of any cases of complaints that malfunctioning meters are leading to customers being left off supply. All DNSPs have agreed to ‘bridge’ the meter to maintain supply if the meter malfunction could have an impact on continued electricity supply for the customer.”*

However, in our submission to the consultation paper, we provided the following case study of a customer without power due to a malfunctioning meter:

#### Case study: Unacceptable delay

A customer’s meter was destroyed in a fire in late December 2017. The necessary electrical repairs were completed and the customer was waiting for a new meter, which her contractor had told her needed to be arranged through her retailer. The retailer told the customer that it would take another month to have a new meter installed. She argued with the retailer and it reduced the wait time by a week. The customer came to EWON in January 2018 after living in the house without power for twenty days, including over Christmas, as she had nowhere else to go. A neighbour had let her run an extension cord to his connection for essentials but had withdrawn it as this was tripping his supply. She was especially frustrated because another neighbour, who was with a different retailer, had his meter (which was also affected by the fire) replaced quickly. EWON contacted the retailer and pointed out the urgency of the situation. The retailer agreed to contact the metering provider and a meter was installed the next day.

In addition, the following case study illustrates a situation where a DNSP only ‘bridged’ a meter to restore supply after a lengthy delay.

#### Case Study: Customer off supply

A customer was disconnected for non-payment on 22 February 2018. A payment plan was agreed to, and a reconnection order was raised. However when the distributor went to reconnect, several defects were identified, and the distributor could not reconnect until these were rectified. The customer’s landlord arranged for the work to be undertaken which was completed on 28 February. To finish the repairs and reconnect, a new meter was required, but the retailer said that the earliest this could occur was 23 March. The customer made many calls to both the retailer and

the distributor and could not arrange reconnection. The customer had four children which heightened the urgency of reconnection. The customer contacted EWON on 6 March.

EWON contacted the retailer who said that the meter request was being treated as a new connection. EWON also contacted the distributor and asked about a 'bridge' connection as allowed by the National Electricity Rules. The distributor agreed to explore this option. The retailer then indicated that it would try to escalate the meter installation. Two days later no progress had been made.

The distributor indicated that the retailer had requested a 'bridge' connection which the distributor had not actioned. EWON then contacted the retailer who re-iterated that the earliest the meter could be installed was 23 March. EWON indicated that the customer had met all the requirements for reconnection and that the retailer should be considering payment for alternative accommodation. On EWON's urging the distributor inspected the site and identified that a 'bridge' connection was possible if the retailer again requested it.

EWON again contacted the retailer and, after extremely lengthy discussions which were escalated to manager level, the retailer agreed to request the distributor to undertake a 'bridge' connection which finally occurred on 9 March. The retailer then informed EWON that the meter would be installed 3 days later. When EWON confirmed this date with the retailer, the retailer said that the date of installation was again deferred to 23 March. The customer was satisfied with this advice, knowing he could return to EWON if it did not occur.

As these case studies illustrate, customers can be left without power due to a malfunctioning meter, and distributors may not always 'bridge' the meter in a timely manner. As such, EWON very strongly advocates that the meter installation timeframes for customers in this circumstance not be extended. Alternatively, there need to be more robust arrangements made which enable distributors to return to a property and 'bridge' the meter once customer-initiated repairs have been completed.

Additionally, the current and proposed metering installation timeframe requirements of 7.8.10 only apply after a metering coordinator has been notified of a malfunction. As any customer complaint will be made directly with the customer's retailer, EWON strongly recommends that this timeframe should apply after either a retailer or metering coordinator has been notified.

If you would like to discuss this matter further, please contact me or Rory Campbell, Manager Policy and Research, on (02) 8218 5266.

Yours sincerely



**Janine Young**  
**Ombudsman**  
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