

25 October 2018

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

Via online submission

## **Re Draft Rule Determination: Metering Installation Timeframes**

Dear Mr Pierce,

Energy Networks Australia welcomes the opportunity to provide a submission to the Australian Energy Market Commission's (AEMC) Draft Rule Determination concerning the National Energy Retail Amendment (Metering Installation Timeframes) Rule 2018.

Energy Networks Australia is the national industry body representing businesses operating Australia's electricity transmission and distribution and gas distribution networks. Member businesses provide energy to virtually every household and business in Australia.

Energy Networks Australia and our members have been actively engaged in consultation during the rollout of contestable metering reforms. Electricity distribution network service providers (DNSPs) have provided vital assistance to many retailers during the handover of metering responsibilities. Many DNSPs continue to provide metering related assistance to retailers, over and above what is required of DNSPs, long after the official start date of contestable metering.

Energy Networks Australia agrees that there is a need to incentivise improved meter installation service by retailers. Extended delays to metering installation results in unacceptable customer experiences. Prior to the introduction of contestable metering, DNSPs proudly worked within the previous regulatory framework to ensure acceptable customer meter connection expectations, experiences and connection timeframes were met.

Energy Networks Australia generally supports the timeframes and requirements contained within the Draft Rule Determination. However, we consider that it is important that meter connection timeframes and service standards are no lower than those that were previously required of DNSPs. We consider that the customer experience must not be negatively impacted simply to suit current retailer capabilities, and that instead retailer's capabilities should be built to meet customer requirements. Lower customer service levels are surely not a desirable outcome from metering competition.

In recognition of the additional complexity of some scenarios such as multi-occupancy meter connections, Energy Networks Australia and our members are keen to work with all relevant stakeholders including the AEMC to identify how DNSPs can continue

to assist with achieving positive customer outcomes. For further information, please contact Heath Frewin, Head of Distribution, 02 62721531 or [hfrewin@energynetworks.com.au](mailto:hfrewin@energynetworks.com.au)

Yours sincerely,



**Dr Stuart Johnston**  
GM Network Transformation