



Ms Jess Boddington
Project Leader
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

25 October 2018

Dear Ms Boddington

**Submission to the Australian Energy Market Commission (AEMC):
Metering Installation Timeframes**

The Energy and Water Ombudsman (SA) Limited (“EWOSA”) welcomes the opportunity to comment on the Australian Energy Market Commission’s Draft Rule Determination on the *Metering Installation Timeframes* rule change requests.

EWOSA is an independent Energy and Water Ombudsman Scheme in South Australia. It receives, investigates and facilitates the resolution of complaints by customers with regard to (*inter alia*) the connection, supply or sale of electricity, gas or water.

Delays to metering installation since the introduction of competition in metering in December 2017 have been experienced by many electricity customers, particularly in South Australia, resulting in significant complaints to EWOSA, as discussed in our submission to the AEMC’s Consultation Paper and in the Draft Rule Determination.

We support the draft rule designed to rectify the situation and acknowledge that the date for the implementation of rule changes imposing metering installation timeframes is unlikely to be any earlier than 1 January 2019.

However, given the importance of the issue, it should be noted that large electricity retailers have entered into agreements with the South Australian Government to improve outcomes for energy consumers. These agreements are designed to ensure that meters are installed within specific timeframes and if this does not occur, that compensation payments are made to affected customers. These agreements should help to bridge the gap between the time when the agreements were signed (mid-September) and the implementation date of the new rule.

We agree with the default position in the draft rule that the installation of meters should be on a date agreed between the retailer and the customer (and distribution network service provider (DNSP) where necessary) and that regulated maximum timeframes for the installation of meters should only be triggered when there is no agreed date. We support the metering installation timeframes for small customers of:

- six days for meters in the case of new connections
- 15 days for other meters, including replacing faulty meters, installing solar meters and other customer-initiated meter exchanges

We also support the timeframes taking account of any necessary works that need to be undertaken by the DNSP, as well as the requirement that the DNSP and the retailer must coordinate their operations to allow the retailer to meet its metering installation timeframe obligations.

While we agree that there will be situations – such as replacing a meter at a site of multiple-occupancy where interrupting supply will affect a number of consumers – where retailers may not be able to comply with the metering installation timeframes and we support such exemptions applying, we believe that the final rule should require retailers to inform customers of their right to contact the energy ombudsman in their jurisdiction if they are unhappy with the service that has been provided under exemption situations.

We support the recommendation of the AEMC that the metering installation timeframes rules should be subject to civil penalty provisions. We believe this would provide the necessary incentive for retailers and their contractors, as well as distribution network service providers, to comply with their obligations.

We believe payments from retailers to customers affected by metering installation delays, particularly those who have suffered financial losses as a result, should also be considered for the final rule. Such payments could be designed in a similar way to a Guaranteed Service Level payments scheme.

We support other major elements of the preferred draft rule, including:

- obligations on the retailer to inform small customers of the metering installation timeframes for customer-initiated works
- providing more flexible notification requirements for retailer planned interruptions of electricity supply – where no notification is required when a metering installation date has been agreed between the retailer and the customer and a minimum of four business days planned interruption notice is required when a date has not been agreed
- a recommendation to the Australian Energy Market Operator that the appointment process for metering parties is streamlined in certain circumstances

We agree with the AEMC's decisions to not make rule changes regarding:

- removing the requirement for retailers to provide planned interruption notices to large customers
- removing the requirement for retailers to provide a 24 hour phone number for customer inquiries about retailer planned and unplanned meter fault interruptions
- allowing customers to opt out of the notifications required under the National Energy Retail Rules for new meter deployments

Should you require further information or have any enquiries in relation to this submission, please email me at antony.clarke@ewosa.com.au or telephone me on (08) 8216 1851.

Yours faithfully



Antony Clarke

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