



D18125209

23 October 2018

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

Dear Mr Pierce,

**RE: ERC0236 – DRAFT RULE DETERMINATION – NATIONAL ELECTRICITY AMENDMENT (METERING INSTALLATION TIMEFRAMES) RULE 2018, NATIONAL ENERGY RETAIL AMENDMENT (METERING INSTALLATION TIMEFRAMES) RULE 2018**

The Energy and Technical Regulation Division (Division) of the Department for Energy and Mining thank you for the opportunity to make a submission on the *National Electricity Amendment (Metering Installation Timeframes) Rule 2018*, *National Energy Retail Amendment (Metering Installation Timeframes) Rule 2018* draft rule determination issued by the Australian Energy Market Commission (AEMC) on 13 September 2018.

The Division supports the implementation of retailers providing customers with metering-related services within a defined timeframe, noting the poor experience that customers have experienced since 1 December 2017. We further support the commencement date of 1 January 2019, noting that retailers (and their metering service providers) will have had over three years to achieve market readiness and that this will be approximately one month after the publication date for the final rule and determination.

Recognising that, at the time of this submission, the new metering provisions will not come into effect for several more weeks, the South Australian Government has been proactive and has obtained agreements from each of South Australia's biggest electricity retailers to end the extended delays customers have been facing within the State for metering-related services. AGL, Origin and EnergyAustralia have each agreed to offer significant financial compensation for customers who are left waiting too long to receive adequate metering-related services.

Should these agreements fail to deliver acceptable outcomes to South Australian customers, the Division has also drafted amendments to introduce timeframes for metering-related services in local regulations. These local regulations, if implemented, will ensure that South Australian customers receive acceptable metering-related services. These local regulations would cease once the AEMC's final rule comes into effect on 1 January 2019.

Recognising that the new metering timeframes are proposed to come into effect on 1 January 2019, the AEMC should consider the impact on metering-related works that were scheduled, but not actioned, prior to 1 January 2019.

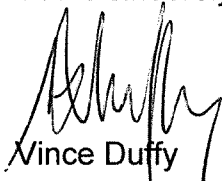
Currently, the Division is concerned that industry will commit to the new metering timeframes for all new works scheduled after 1 January 2019. The AEMC should consider whether the draft rule provides sufficient cover for small customers who have yet to receive metering-related works between 1 December 2017 and 1 January 2019 that were scheduled yet still not actioned.

In these situations, where all preconditions have been met before the rules commence, the commencement date of the rules should be considered the day the retailer's installation timeframe requirements commence. The commencement of the rules would effectively be equivalent to the day all preconditions are met, and the retailer would therefore have the regulated timeframe to complete the installation. Any 'backlog' should therefore be completed within the timeframes driven by this new rule.

The Division is also concerned with the drafting of the new clauses regarding the interruption of supply to another retail customer. Specifically, clauses 7.8.10A (b) (3), 7.8.10B (b) (3) and 7.8.10C (b) (3). The Division considers that as presently drafted, no maximum timeframe commences when installing the meter requires interrupting supply to another retail customer. The AEMC should therefore reconsider the drafting to ensure that a timeframe will commence when metering-related works may interrupt the supply of energy to another retail customer. This will ensure that customers who, for example, live within multi-dwelling units (MDUs) are not disadvantaged when requesting metering-related services within a reasonable timeframe.

Thank you for accepting our submission. Should you wish to discuss this further, please contact Ms Rebecca Knights, Director, Energy Policy and Projects – Energy and Technical Regulation Division, on (08) 8429 3185.

Yours sincerely,



Vince Duffy

Executive Director, Energy and Technical Regulation

23 October 2018