

Our Ref: EWOQ/19/0009
Your Ref: ERC0246

5 February 2019

Attention: Mr James Hyatt
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

aemc@aemc.gov.au

Dear Mr Hyatt

**Re: AEMC Reference – ERC0246 – Draft Rule Determination - Meter Installation –
Advanced Meter Communications**

Thank you for the opportunity to make a submission on the Draft Rule Determination on the *National Electricity Amendment (Meter Installation – Advanced Meter Communications) Rule 2019*.

Background to EWOQ

The Energy and Water Ombudsman Queensland (EWOQ) provides a free, fair and independent dispute resolution service for small electricity and gas customers across Queensland and water customers in south east Queensland who are unable to resolve a dispute with their supplier. Our submission is based on our experience as an external dispute resolution scheme dealing with residential and small business energy customer complaints in Queensland.

Assessment Framework

We understand the Australian Energy Market Commission (AEMC) has to determine whether the proposed rule will, or is likely to contribute to the achievement of the National Energy Objectives. With this in mind, we support the AEMC's choice of assessment framework which evaluates the rule change against the criteria of cost and consumer-reflective value for metering services and concur with the summary of reasons outlined in the draft determination.

Feedback on the Draft Rule Determination

EWOQ supports the intention of the draft rule determination and welcomes any change which improves outcomes for customers, providing a simpler and less costly process to deactivate the remote communication ability on the installed advance meters.

As an industry Ombudsman scheme, we have received complaints from customers who want the remote communications functionality on a type 4 meter deactivated. It is also likely the number of customers that do not want the communications functionality to remain enabled (customer refusal) will grow over time as more advanced meters are rolled out. Accordingly, we are supportive of introducing a simplified, cost effective and more flexible process which enables customers to select a meter type consistent with their needs.

EWOQ further welcomes the measures to strengthen the existing consumer protections. In particular, we endorse the provisions which place an obligation on metering coordinators, as a pre-condition to acceptance of a customer's refusal of a type 4 meter, to provide information about:

- upfront costs and indicative ongoing expenses with type 4A meters payable by the customer; and
- the differences between type 4 and type 4A meters.

We understand this will apply to both a customer's refusal of the installation of a new or replacement type 4 meter, and also the replacement of an installed type 4 meter with a type 4A meter. In our experience, customers identified information provision as a key area to improve consumer engagement and confidence with the industry.

Consistent with the feedback from other stakeholders, we would encourage the AEMC to further consider how the information provided to customers under the draft rule provisions is to be recorded by metering coordinators. We note that the draft rule does not prescribe how a metering coordinator must record compliance.

EWOQ also recommends the AEMC reconsider specifying a maximum timeframe for the metering coordinator to provide a customer with a Type 4A meter if a customer's refusal is accepted. Similarly, maximum timeframes should be considered for the reactivation of the communications facilities with the customer's consent, on a type 4A meter. Prescribing maximum timeframes, similar to the those recently implemented by the Metering Installation Timeframe rule change, would mitigate the possibility of delays in the meter changes occurring and provide a consistent approach across the industry.

Overall, EWOQ concurs with the AEMC's view that the draft rule will *'contribute to better outcomes for consumers in the longer term with respect to price by reducing costs and reflecting the value some consumers place on certain metering services'*.

Thank you for the opportunity to contribute to this draft rule determination. If you require any further information regarding this matter, please contact me on (07) 3087 9455.

Yours sincerely



Ilona Cenefels
General Manager – Reporting, Policy and Research

cc. Jane Pires