



20 February 2019

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

Dear Anne

**AEMC Reference RRC0026 – Rule Change Request – Consultation on request for rule change – Bill contents – Start and End Reads for customers with advanced interval meters**

Thank you for the opportunity to comment on this consultation paper.

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 through our community outreach and stakeholder engagement activities.

EWON welcomes this rule change proposal as a positive step in improving consumer confidence in electricity billing and the Power of Choice rollout of digital meters.

Our submission focuses only on the aspects of the proposed rule that have relevance arising from our casework, experience and expertise.

EWON receives complaints from customers who consider the failure of retailers to include start and end reads on bills prevents them from accurately reconciling total consumption against the previous bill.

During a complaint about a high bill, it often emerges that a customer was not aware the transition to a digital meter would result in the loss of start and end reads on their invoices. This can lead to a lack of consumer confidence, particularly when consumers are required to 'trust' their retailer has billed them correctly.

The two case studies in the attachment illustrate this.

National Energy Retail Rule (NERR) 8(3) allows retailers not to display the values of meter readings at the start and end of the billing period when the required metering data is not reasonably available.

All retailers are required to provide start and end reads on invoices for customers in Victoria pursuant to the requirements of the Victorian Energy Retail Code. Additionally, several retailers already include start and end reads on invoices for their NSW customers. EWON considers these two perspectives demonstrate that the data should be considered to be 'reasonably available'.

In its consultation paper the AEMC refers to rule NERR 56A and National Electricity Rule 7.14, which requires retailers and DNSP's to make reasonable endeavours to respond to consumer requests for data within ten days as a possible alternative to providing start and end reads on invoices.

This adds a second level of complexity for consumers who are wanting to reconcile a bill before payment, and the timeframe provisions of this data may limit a customer's opportunity to take advantage of contract benefits like 'Pay on Time' discounts.

Many digital meters are capable of being read by customers and some retailers publish guidelines on 'how to read your meter' on their websites. However, these instructions are often not comprehensive and may lead to consumer error. In addition, many customers, such as those residing in apartment complexes, do not have access to their meter.

Some retailers provide online access to customer meter data which helps customers reconcile bills, however many do not, and there are many customers who do not have access to the internet.

We recognise that for some retailers, in particular the few who do not also participate in the Victorian market, providing start and end reads on bills will require a modification to existing billing platforms, which will be an expense. However, as the proposed change will enable customers to reconcile bills more easily and increase trust in the energy market, EWON supports it.

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**  
**Energy & Water Ombudsman NSW**

## Attachment – Case studies

### Case study 1

A customer came to EWON with a number of issues, one of which was the failure of his retailer to include start and end reads which would enable him to reconcile his bill. The complaint was initially referred back to his retailer via our referral process. However, the customer returned to EWON as he was not satisfied with the outcome.

An EWON investigation established that the customer had been billed correctly and we advised him that there is no obligation on a retailer to provide start and end reads. The customer said that if meter reads were not provided on bills, he had very little confidence in the meter.

### Case study 2

A customer came EWON after receiving a bill she considered to be high.

During EWON's investigation the customer became aware that, as she had a new digital meter installed, start and end meter reads would no longer be available on her bills. Her retailer referred her to its website, where information on how to read her meter was available. The customer tried to follow the instructions but was not successful. She then asked the retailer to attend her home to provide clear instruction on how to read the new meter, but the retailer declined. The customer said she did not place much faith in her retailer billing her correctly.

The matter was resolved with a customer service gesture.