

Our Ref: EWOQ/19/00016
Your Ref: RRC0026

27 February 2019

Attention: Stephanie Flechas
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

aemc@aemc.gov.au

Dear Ms Flechas

Re: AEMC Reference – RRC0026 - Consultation Paper – National Energy Retail Amendment (Bill Contents – Customers with Interval Meters) Rule 2019

Thank you for the opportunity to make a submission on the Consultation Paper on the *National Energy Retail Amendment (Customers with interval meters) 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.

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 competition between retailers, enhancing customer information and decision making, transparency and trust in retailers and regulatory and administrative burden outlined in the draft determination.

Feedback on the Draft Rule Determination

EWOQ welcomes the draft rule determination as we believe it is an important step in assisting customers manage their energy usage and reconcile their bills.

Assessment Framework

The intention of the draft rule determination and any change which improves outcomes for customers and provides customers with information to make better informed decisions regarding their energy usage will enhance the trust between customers and their retailer regarding meter reads.

Prevalence of the issues raised in the rule change request

EWOQ has received complaints regarding interval meter readings and the difficulty that customers experience in reconciling their energy bills with self-read data. Customers have also

had issues as a result of a meter fault (the customer cannot ascertain what usage has been calculated as the meter is re-set, thus the customer is unable to validate their usage).

As part of the National Energy Retail Law, there is a requirement for a meter identifier, which is the National Meter Identifier, however if the meter is replaced and start and end reads are not recorded, there is no transparency from the usage on the old meter and the replacement meter.

It would be advantageous for start and end date reads to be provided to customers insofar that it enables a better understanding of their energy usage and assists with validating their energy usage from one bill to the next.

Information and understanding of advanced interval meters

Retailer websites contain some information on interval metering to assist customers with understanding their bills and energy consumption whereas, other customers utilise social media platforms such as YouTube for assistance. Whilst information and tools are available on retailer websites and via YouTube, to assist with 'how to read advanced meters', EWOQ's experience is that this level of information is not at an acceptable level of assistance. This lack of information results in customers contacting EWOQ to provide support. Additionally, it is our understanding that customers are currently not provided with any information regarding interval metering.

Retailers should provide easy to interpret (non-technical) fact sheets, utilising infographics and simple language to assist customers in understanding advanced interval meters. Further, when a notice is provided to customers that an interval meter is to be installed at their property, a copy of the fact sheet to support the customer in understanding the meter and how to read the meter should be provided.

Potential solutions to the issues identified

Under Rule 28 of the National Energy Retail Rules, a retailer is required to provide up to 2 years' meter read data on the request of the customer. If this proposed rule change is implemented, it will bring consistency for customers to compare their meter read data with their billing data, if the start and end reference reads are included on the interval metering data summary which is provided by the retailer to the customer.

As retailers provide meter read data for Victorian customers, this information should be available to all customers, irrespective of where the customer resides.

EWOQ is supportive of the proposed rule change mandating for all retailers to include in their bills, the values of meter readings for the start and end of the billing period, regardless of the customer's metering type. This would assist customers in managing their energy usage and provide the necessary information for customers to reconcile their bills.

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