



1 March 2019

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

Lodged electronically: www.aemc.gov.au

Dear Mr Pierce,

Re: Bill Contents - customers with interval meters RRC0026

Origin welcomes the opportunity to provide a response to the Australian Energy Market Commission's (AEMC) consultation paper regarding the display of data on billing for customers with interval meters.

One of the key objectives of the power of choice reforms was to provide customers with clear signals about the cost of their energy consumption to enable them to manage their demand. This objective was underpinned by the introduction of a market led rollout of smart meters and the introduction of cost reflective network tariffs. It was also envisaged that these reforms would encourage retailers and third-party entrants to develop products and services to enable customers to respond to price signals in real time.

We agree that customers need to have confidence that they are being billed correctly. One of the key differences between accumulation and smart meters is that for the purposes of billing an accumulation meter provides a start read and an end read and this accumulated usage is used to determine the customer's bill.

However smart meter bills are not calculated on this basis, they are calculated on the sum of the half hourly readings of the meter over the billing period. The sum of these half hourly readings will not necessarily always match the end index read minus the start index read as index reads do not include estimates or substitutes which may be included in the half hourly data.

The purpose of capturing usage in 30 minute intervals is because it gives the customer access to flexible tariff structures such as time of use tariffs. As a result, the customer can manage their usage in response to different time of use prices to achieve bill reductions. Therefore, understanding when electricity is being used is more important than how much is being used over a billing cycle. To enable this understanding around usage, retailers generally provide online portals (for example Origin's MyAccount) which allows customers to see their consumption across the different times of the day.

Importantly, AEMO's Metering Data Service Level Procedures establish the requirements for managing metering data. These Procedures are designed to ensure consistency and accuracy of data to facilitate billing of customers. An important feature of these procedures is the requirement that Meter Data Providers validate the metering data prior to delivering it to the relevant stakeholders. This validation ensures that the subsequent billing of customers via the retailer is reflective of the data recorded by the customers metering.

Furthermore, under the NERR, customers are able to request billing information from retailers and retailers are obliged to promptly provide a small customer with its historical billing data for the previous two years. This information must be provided without charge.

We consider that retailers need to accept ownership for educating customers around their usage and understanding their bills.

We do not believe that the benefits of providing customers with a start and end usage value based on an index read will be beneficial because it will not necessarily align with the interval usage data that is used for billing purposes. We believe that better education and access to a customer's interval usage will provide greater benefit as this will more likely lead to a customer seeking services that will optimise their usage and minimise their bills.

We also believe that the current rules provide necessary safeguards to allow a customer to question their bill in the event that they are concerned over its accuracy.

For these reasons, we believe the concerns raised in the AEMC's consultation paper can be adequately addressed under the current regulatory framework.

If you have any questions regarding this submission, please contact Courtney Markham in the first instance at Courtney.Karkham@originenergy.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sean Greenup', with a large, stylized flourish at the end.

Sean Greenup
Group Manager Regulatory Policy
(07) 3867 0620 sean.greenup@originenergy.com.au