

To the Australian Energy Market Commission.

I wish ask for a reconsideration of my proposal of a draft rule change for customers with interval meters 18 April 2019 to be re visited and to be implemented as stated below

“That all electrical suppliers where smart meter readings are used to generate an electricity account disclose a beginning and ending meter reading to the dates used to create the customers electricity account. This rule change will make reconciling an electricity account accountable and transparent to all, which will improve community trust with electricity energy providers. It would reduce the excessive work that is caused by these accounts to the NSW Ombudsman’s office, AER and Electricity supplies as everything would be see-through and not appear to be ‘smoke and mirrors’ and improve the community respect or trust in the whole electricity supply industry in the country.”

I find it hard to understand why the commission has decided not to approve the proposed rule. As I suggested it would make the retail electricity sector more accountable and transparent. Some of the feedback for the electrical retail sector states that it would create more confusion in reconciling an electricity account.

- AGL Quotes states “In general, billing of consumption is calculated by adding together all the intervals of consumption data (recorded in 15/30 min) relevant for the billing period x the applicable rate/price. There are multiple scenarios where the reference reading displayed does not align with actual consumption.”

AGL thus implies that their customer retail electricity account is not accurate, if so why has the AEMC allowed such a system to be implemented? Doesn’t the consumer have the right to be shown just exactly how the retail electricity account is derived?

- AGL Quotes “states that the smart meter take up is low outside Victoria, Additionally, customers do not find it easy to locate the reference reading on their meter, as they need to scroll through multiple AGL 6 screens, which is more complex and confusing when multiple registers are configured (eg. Solar). Therefore, the index read does not allow customers to verify consumption and can therefore be inaccurate in verifying a bill.”

The take up of smart electricity meters may be slow now outside Victoria, but as more and more new houses and solar systems come on line, plus meter replacements occur this will increase smart meters. Retail electricity customers want to see the advantage, for example, if they fit a solar and or battery-solar electricity system, that the momentary outlay or investment shows a return in meter reading data shown on the electricity account which verifies a return on that investment cost. Perhaps now, while there is a lower up take, is the time to make adjustments for the ease of the customer reading the metres.

- Aurora Energy Quote “Ensuring customers can understand their electricity bill is highly important to Aurora Energy.
An easily accessible and comprehensible bill facilitates a positive customer experience through ensuring transparency and building trust with customers.

Aurora Energy acknowledges the issues raised by the rule change proponent. However, it does not support the proposal to amend the National Energy Retail Rules (NERR) to mandate the inclusion of start and end advanced interval meter readings on a customer bill. This is based on:

- Advanced meter data being more complex, difficult to access and challenging to correlate against different retail tariff combinations, particularly customers with solar generation or time-of-use tariffs.
- Effective customer protection obligations already act to provide customers with their meter data to ensure transparent billing outcomes.
- Retailers provide innovative customer solutions that cater for advanced meter data complexity.
- Given the nature of advanced meter data, providing a start and end meter read for customers with an interval meter would require a significant system change and produce costs for Aurora Energy and subsequently its customers.”

Aurora Energy states that “Effective customer protection obligations already act to provide customers with their meter data to ensure transparent billing outcomes”. If that is so where is the retail customer data or figures? If it needs sufficient system changes so be it. Again this company is stating that it is too hard like AGL. Customers don’t want extra cost imposed due to smart meters by requesting quote “Aurora energy customers can request a meter test or check of the meter data if they seek to review a bill” thus customer would pay for this.

- “Finally, Aurora Energy notes the proposed Rule change would require a significant system amendment and cost for Aurora Energy. Aurora Energy considers this an unnecessary impost noting the challenges in communicating advanced meter data and that the current measures for providing data to customers under regulation, and through retailer innovation, are sufficient.”

Don’t retail electricity customers have a right to their data and to know that their account is accurate?

- In summary, quote: “Energy Queensland supports efficient investment in solutions that enable customers to better understand their energy consumption, allow billing reconciliation and facilitate greater customer confidence. Energy Queensland therefore appreciates the rule change proponent’s view that disclosing start and end meter readings on bills may assist some small customers to reconcile their bills and energy use. However, Energy Queensland considers that a robust cost benefit analysis should be carried out to ensure the costs to implement the proposed solution do not outweigh the benefits to electricity consumers. As noted by the AEMC in the consultation paper, if it becomes mandatory to disclose start and end meter readings on interval meter customers’ bills, costs will be incurred by retailers as a result of changes required to existing billing systems.”

If Energy Queensland states that they: “support solutions to enable customers to better understand their energy consumption.” If that is so where is the meter data, doesn’t the customer own the smart meter data?

The retail electricity market allows customers to swap between electricity retailers. So how can a retail electricity customer know that if or when they swap supplier that previous and new account is accurate as stated with no data figures included, can they trust them both? Most people change due to being unhappy with the previous supplier.

The electricity energy providers say that they have systems in place to assist customers in checking their account or electricity use. If that is so why not take it further and include the account creating data from the smart meters which by the way most smart meters are cumulative type units like the Accumen's fitted to my house, contrary to what they have stated in some of the electrical retailers' replies

The retail electricity sector is out of touch with their customers. Many customers have a story or stories about an electricity retail supplier who won't listen or tells the customers whatever so they go away. I accept many suppliers have some minor systems to assist retail customers to check their retail electricity usage, why can't the smart meter data (the beginning and end read) be shown on the account? However not all retail electricity providers have such portals etc. and some are only available for some operating systems (e.g. Origin has as only just released an android app – previously it was only available to Apple customers) or not all. Where does this leave customers who are technology challenged in either not having a computer, smart phone or internet? And yes, I know a few who have none of these.

Now confusion? Currently, "the NERR prescribes that retailers must include in the bill the start and end meter readings for each billing period. A transitional provision permits retailers not to display these values for interval meter customers, only if the metering data required is not reasonably available."

This still leaves one question. How does the electricity retailer work out what to charge the customer for their electricity usage what figures are they using? If the readings are too confusing to disclose to the electricity retail customer, could it not be said that it is also too confusing for retail electricity provider staff to calculate correctly and create accurate accounts? I feel that by supplying the figures that the account is based on, by the way isn't this data the customer data e.g. the beginning and end usage figures, would dramatically reduce the confusion for customers who want to check that the smart meter is working and metering correctly; and thus can TRUST their retail supplier.

So this leads me to infer that an electricity retail supplier could, or even may, pick any number or quantity of electricity kilowatts usage figure and issue an account. The retail electricity consumer then has no way of verifying the account for its accuracy. This could be as little as an extra \$1 to 30.00 over charge and the electricity retail customer just has to grin and bear it unknowingly as no data is supplied and often would not suspect the error. So a dishonest electrical retail provider or a staffer scam could happen and the customer would not know. The Electricity retailer should have to be able to verify the accuracy of the electricity account by disclosing the smart meter figures. A little bit unfair for this lack of transparency, as they say TRUST us! If they, the electricity energy retailers feel it would cause confusion to understand smart meter data why not provide open data and instructions on how match or verify the account to the smart meter data readings as a leaflet or on their web sites as they do on the old dial meter and how to read them.

I feel the AMEC is for helping electricity retail customers to have improved trust in all electricity market systems so customers can regain trust the sector.

I quote from your Australian Energy Market Commission Applying the energy objectives A guide for stakeholders 1 December 2016

Quote "Finally, the NERO (National Energy Retail Objective) states that: "the objective of this Law is to promote efficient investment in, and efficient operation and use of, energy services for the long term interests of consumers of energy with respect to price, quality, safety, reliability and security of supply of energy."

"After all of these issues are considered, the fourth step analyses the efficiency in the long-term interests of consumers implications of the rule change or review. That is, whether the recommendation or rule change would promote the energy objective of efficiency in the long term interests of consumers is evaluated and this will ultimately inform the Commission's decision on whether the change to the Rules in question or the recommendation should be made. Fifth and finally, if the rule change relates to the NERR, the Commission must consider whether the proposed change is compatible with the development and application of consumer protections."

In conclusion:

I hope that the AMEC would reconsider your decision regarding my proposal for the Smart Meter Data disclosure on retail electricity accounts.

Allowing this proposal to go through would go a long way to begin a change in feeling of mistrust of the whole retail electricity sector and go some way in assisting or changing society's impression of the electricity retail sector. It would assist charities in helping people requiring assistance with electricity accounts and government sectors like NSW Ombudsman (EWON) in reducing their work load.

Why not act on this rule change and assisted electricity retail customers understand their smart meter created electricity account by including the smart meter data for the beginning and the end of the billing period which the electricity retail provider uses to create the retail customers account in the first place and remove the feeling of what appears to many to be 'guesstimating' to make the account or bill. This would decrease the work currently imposed on customers and complaint sections including the electricity retailer provider's complaint section and other private and public sectors in dealing with billing complaints and unhappy electricity retail customers whether genuine compliant or not from what appears as the lack of transparency on an electricity retail account from a smart meter.

Please help to restore the respect of the society with the whole retail electricity supply sector.

Regards

Craig Whybrow
Proponent

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Saturday, 27 April 2019

AMEC Reply to DRAFT RULE DETERMINATION NATIONAL ENERGY RETAIL AMENDMENT (BILL CONTENTS - CUSTOMERS WITH INTERVAL METERS) RULE 2019 PROPOSER Mr Craig Whybrow 2 The Commission has decided not to make a draft rule to amend the NERR