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30 May 2019

Ms Daniela Moraes
Senior Adviser
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted electronically

Dear Ms Moraes,

Re: Draft rule determination: National Energy Retail Amendment (Bill contents - customers with interval meters) Rule 2019

Red Energy and Lumo Energy (Red and Lumo) welcome the opportunity to respond to the Australian Energy Market Commission's (Commission) draft rule that requires retailers include start and end meter readings in the bills of customers with advanced interval meters.

Red and Lumo strongly support the Commission's decision not to make a draft rule.

We agree that consumers with interval meters not having start and end reads on their bill is an immaterial issue. We note the Commission has found:

- consumers with interval meters already have reliable tools available at their disposal to ensure their metering data is reliable.
- the regulatory and administrative costs that would arise if a rule was made would not be justified. Therefore, the proposed rule change is not in the long-term interests of consumers. As such, it will not contribute to the achievement of the National Electricity Rules Objective (NERO) at this time.

About Red and Lumo

Red and Lumo are 100% Australian owned subsidiaries of Snowy Hydro Limited. Collectively, we retail gas and electricity in Victoria, South Australia, New South Wales and Queensland and electricity to the ACT to approximately 1 million customers.

Should the Commission have any enquiries regarding this submission, please call Con Noutso, Regulatory Manager on 0481 013 988.

Yours sincerely

Ramy Soussou
General Manager Regulatory Affairs & Stakeholder Relations
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