



Australian Energy Market Commission

RULE DETERMINATION

NATIONAL ENERGY RETAIL AMENDMENT (BILL CONTENTS - CUSTOMERS WITH INTERVAL METERS) RULE 2019

PROPONENT

Mr Craig Whybrow

11 JULY 2019

RULE

INQUIRIES

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

E aemc@aemc.gov.au
T (02) 8296 7800
F (02) 8296 7899

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ABOUT THE AEMC

The AEMC reports to the Council of Australian Governments (COAG) through the COAG Energy Council. We have two functions. We make and amend the national electricity, gas and energy retail rules and conduct independent reviews for the COAG Energy Council.

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SUMMARY

- 1 On 18 June 2018, Mr Craig Whybrow (the proponent) submitted a rule change request to the Australian Energy Market Commission (AEMC or Commission) to amend the National Energy Retail Rules (NERR). The proponent considered that a rule change should be made requiring all electricity retailers to display start and end meter readings in the bill for every customer with an advanced interval meter (smart meter).
- 2 The Commission has determined not to make the proposed rule to amend the NERR. No new evidence has been put forward which alters the Commission's conclusion in the draft determination.
- 3 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.
- 4 The purpose of including start and end meter readings in energy bills is for customers to have sufficient information when reconciling their bill. The proponent suggested that including these readings in the bill would increase customer's trust and improve transparency in the market.
- 5 The Commission considered, when assessing this rule change request, whether the underlying issues raised by the proponent are best addressed by competitive market interactions or changes to the rules. The materiality of the issue raised by the rule change request was found to be insufficient to make the proposed change. The analysis undertaken by the AEMC found that:
 - Not including start and end meter readings in the bill is not a material issue for most electricity customers with interval meters.
 - Start and end meter readings would be insufficient to allow customers with interval meters to reconcile their bills. The proposed change could have an unintended consequence of increasing consumer confusion, considering that such meter readings would not always correspond to the customer's energy usage (as interval meters measure usage in intervals and not on a cumulative basis).
 - There are alternative market measures that can assist in achieving the purpose of the rule change request. The market already offers various tools for customers to verify their energy consumption that are more effective than the proposed rule change. The current rules also provide an adequate framework that assists consumers in case they need additional support to check their bill or their meter.
 - It is not likely that including start and end meter readings in electricity bills would increase trust or transparency in the market. Therefore, the increased levels of regulatory and administrative costs that would arise if a rule is made would not be justified.
- 6 On this basis, the Commission has determined that the proposed change to the current bill content requirements in the NERR is not in the long-term interests of consumers and will not, or is not likely to, contribute to the achievement of the National Electricity Rules Objective (NERO) at this time.

CONTENTS

1	Rule change request	1
1.1	The rule change request	1
1.2	Rationale for the rule change request	1
1.3	Solution proposed in the rule change request	1
1.4	Current arrangements	1
1.5	The rule making process	5
2	Final rule determination	6
2.1	The Commission's final rule determination	6
2.2	Rule making test	6
2.3	Assessment framework	7
2.4	Context within which the rule change request was assessed	7
2.5	Summary of reasons for not making a rule	9
3	Commission's assessment	10
3.1	Prevalence of the issue	10
3.2	Other issues raised in the rule change request	16
3.3	Potential solutions	17
	Abbreviations	28
	APPENDICES	
A	Summary of other issues raised in submissions	29
B	Legal requirements under the NERL	30
B.1	Final rule determination	30
B.2	Power to make the rule	30
B.3	Commission's considerations	30
	TABLES	
Table 3.1:	Other tools/solutions available for customers with advanced interval meters	22
Table A.1:	Summary of other issues raised in submissions	29
	FIGURES	
Figure 1.1:	AEMO example — Interval metering data summary format	4
Figure 3.1:	NSW advanced interval meter take-up v. customer complaints	14
Figure 3.2:	SA advanced interval meter take-up v. customer complaints	15

1 RULE CHANGE REQUEST

1.1 The rule change request

On 18 June 2018, the Australian Energy Market Commission (AEMC or Commission) received a rule change request from Mr Craig Whybrow (the proponent) to amend the National Energy Retail Rules (NERR). The proponent is a residential customer based in NSW who agreed to have a smart meter installed in his premises. After he had a smart meter installed, he noticed he was no longer able to see a start and end meter reading in his bill.

1.2 Rationale for the rule change request

The issue raised by the proponent in the rule change request is the fact that small electricity customers with an advanced interval meter cannot (always) find in their bill a meter reading for the start and end of the billing period. Additionally, a number of key points raised in the rule change request are summarised as follows:

- small customers do not have a satisfactory method to correlate their electricity consumption with their electricity bill
- retailers do not provide enough information for customers to understand how to read their new advanced interval meters correctly
- the electricity market is not transparent about the change in information when an advanced interval meter is installed (installation procedures and use).

1.3 Solution proposed in the rule change request

The proponent's solution is to require all energy retailers to include in their bills a start and end meter reading for each billing period for advanced interval meter customers. To implement this solution the NERR would need to be amended.

The proponent outlined the following anticipated benefits if the proposed solution is adopted, it would:

- facilitate billing reconciliation
- improve consumer trust in energy retailers
- reduce the number of consumer complaints submitted to Ombudsman agencies, the Australian Energy Regulator (AER) and energy retailers.

The rule change request did not include a proposed rule.

1.4 Current arrangements

1.4.1 Retailer billing requirements

Under the NERR, retailers must include minimum contents in energy bills so that small customers can easily verify their bill.¹ Among the different requirements listed, rule 25 states:

¹ NERR, part 2, rule 25.

(1) A retailer must prepare a bill so that a small customer can easily verify that the bill conforms to their customer retail contract and must include the following particulars in a bill for a small customer:

(...)

(j) the values of *meter* readings (or, if applicable, estimations) at the start and end of the billing period;

The NERR requires retailers to disclose in all energy bills, two cumulative readings, one for the previous consumption period (start of the billing period) and another one for the actual consumption period (end of the billing period). The difference between both numbers is the amount of energy consumed in the billing period.²

This rule is subject to rule 8(3) of schedule 3, part 4 of the NERR which states:

8 Application of start and end meter reads on small customer bills

(1) In this rule:

interval meter is a *meter* that measures and records consumption of electricity derived from interval *metering data* (within the meaning of the NER).

(2) subrule 25(1)(j) applies without modification if a small customer's *meter* measures and records consumption of energy only on an accumulation basis.

(3) If a small customer has an interval *meter*, the requirements of subrule 25(1)(j) do not apply unless the required *metering data* is reasonably available.

As noted, rule 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.

1.4.2

Victorian Energy Retail Code

Victoria has not adopted the NERR in its entirety and the Victorian Energy Retail Code sets a different legal framework for retailers' billing requirements. Among these different requirements, the Victorian Energy Retail Code includes specific billing requirements for retailers with advanced interval meter customers as follows:³

(1) A retailer must prepare a bill so that a *small customer* can easily verify that the bill conforms to their *customer retail contract* and must include the following particulars in a bill for a *small customer*:

(...)

(y) if a *customer's* bill is derived from interval data from a *smart meter*:

(i) the index read at the end of the billing period; and

² This number could also be an estimation if the bill is an estimated bill.

³ Victorian Energy Retail Code, rule 25. The index read is the total accumulated energy for a data stream retrieved from a meter's register at the time of the meter reading event. AEMO, *Meter Data File Format Specification NEM 12 and NEM 13*, section 4.3.4.

- (ii) the *index read* at the start of the billing period; and
- (iii) the actual tariffs; and
- (iv) the total amount of electricity (in kWh) consumed in each period or class of period in respect of which a relevant tariff applies to a customer.

The Essential Services Commission (ESC) introduced this index read requirement in the Victorian Energy Retail Code in 2010.

1.4.3 Billing information requests

The requirements on retailers with regard to billing information requests are set out in the NERR. As mentioned, the NERR has not been adopted in Victoria but similar billing information requests are set out in the Victorian Energy Retail Code.⁴

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.⁵ This information must be provided without charge (subject to conditions).⁶

In addition, rule 56A of the NERR and rule 7.14 of the NER specifies that the energy consumption information must be provided in the manner and form required by the Metering Data Provision Procedures (MDPP) issued by the Australian Energy Market Operator (AEMO).⁷

According to rule 7.14 of the NER, retailers and distribution network service providers (DNSPs) must, using reasonable endeavours, respond to customer requests for billing information within 10 business days after receiving the request (subject to exceptions). The MDPP must include a detailed format and a summary data format for interval meter customers with:⁸

7.14(c)(2) for retail customers for whom interval metering data is available, specify the summary data format, which, at a minimum should include the retail customer's:

- i. nature and extent of *energy* usage for daily time periods;
- ii. usage or *load* profile over a specified period; and
- iii. a diagrammatic representation of the information in subparagraph (i).

Figure 1.1 below provides examples given by AEMO in its Metering Data Provision Procedures in terms of format and presentation to be used by retailers when answering consumer data requests.

⁴ Victorian Energy Retail Code, rule 28.

⁵ NERR, rule 28(1). A breach of this provision incurs in civil penalty under the NERL.

⁶ It may be provided subject to a reasonable charge where the data requested is for an earlier period (before the 2 years period) or has been requested more than four times in any 12 month period for electricity supply or once in any 12 month period for gas supply. NERR, rule 28(2).

⁷ NERR, rule 56A; NER, rule 7.14.

⁸ NER, rule 7.14.

Figure 1.1: AEMO example – Interval metering data summary format

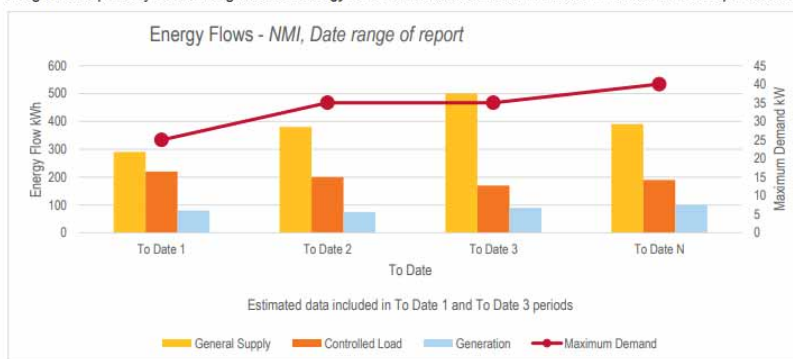
B.1 Example: interval file

Example of data tabulation that would be provided by a *retailer* or *DNSP* for a *connection point* with General Supply usage, Controlled Load usage and separately measured generation *energy* flows and maximum demand.

NMI	Meter Serial Number	UOM	From Date	To Date	General Supply	Controlled Load	Generation	Maximum Demand	Max. Dem. UOM
6xxxxxxxxx	123xxxxx	kWh	From Date 1	To Date 1	290	220	80	25	kW
6xxxxxxxxx	123xxxxx	kWh	From Date 2	To Date 2	380	200	75	35	kW
6xxxxxxxxx	123xxxxx	kWh	From Date 3	To Date 3	500	170	90	35	kW
6xxxxxxxxx	123xxxxx	kWh	From Date N	To Date N	390	190	100	40	kW

B.2 Example: diagrammatic representation of energy usage

Example of diagrammatic representation of data that would be provided by a *retailer* or *DNSP* for a *connection point* with General Supply, Controlled Load usage and separately measured generation *energy* flows and maximum demand. Refer to clause 4.3 for requirements for this diagram.



Source: AEMO, *Metering Data Provision Procedures*, appendix B.

1.4.4

Roles and responsibilities for metering data and billing information

New market participants were created with the competitive framework introduced by *Competition in Metering* in December 2017. The local distributor is no longer the only party responsible for the provision, installation and maintenance of a small customer's meter and metering data collection and delivery. Under the current rules, the 'metering coordinator' is responsible for the metering installations for which it has been appointed and, in turn, it appoints a 'metering data provider' (MDP) who is responsible for providing data services, including reading the meter or calculating an estimate to determine the electricity usage of the customer.⁹

In addition, AEMO's Metering Data Service Level Procedures (MDSLP) establish the requirements for the management of metering data to ensure consistency and data accuracy by market participants.¹⁰ The MDSLP requires metering data providers to use reasonable endeavours to ensure that metering data is collected once every three months for electricity meters. Once it is collected, it must be entered and stored into the MDP's metering data services database. For interval meters the data stored must be aggregated into a 30-minute

⁹ NER, rule 7.10.1.

¹⁰ NER, Chapter 7, rule 7.16.6; AEMO, *Service Level Procedure: Metering Data Provider Services*, section 2.4.1.

interval net data stream.¹¹ AEMO's metrology procedures also require MDPs to validate this metering data prior to delivering it to AEMO or retailers.¹²

Each MDP must deliver the validated metering data to AEMO and retailers within two business days after it was stored in the metering services database. Once retailers receive the validated metering data, it is used for billing purposes.

1.5 The rule making process

On 31 January 2019, the Commission published a notice advising of its commencement of the rule making process and consultation in respect of the rule change request.¹³ A consultation paper identifying specific issues for consultation was also published. Submissions closed on 28 March 2019. The Commission received 15 submissions as part of this first round of consultation.

On 18 April 2019, the AEMC published a draft determination to not make a rule. Submissions on the draft determination closed on 30 May 2019. The Commission received 11 submissions on the draft determination.

In making this final determination, the Commission considered all issues raised by stakeholders in the first and second consultation rounds. The issues raised are discussed and addressed throughout this final rule determination. Issues that are not addressed in the body of this document have been summarised and responded to in Appendix A.

11 AEMO, *Service Level Procedure: Metering Data Provider Services*, sections 3.6 and 3.7.

12 AEMO, *Metrology Procedure*, Part B, Metering data validation, substitution and estimation, section 7.

13 This notice was published under 251 of the National Energy Retail Law (NERL).

2 FINAL RULE DETERMINATION

2.1 The Commission's final rule determination

The Commission's final rule determination is to not make the proposed rule submitted by Mr Whybrow.

The Commission's reasons for making this final rule determination are set out in section 2.5.

This chapter outlines the:

- rule making test for changes to the NERR
- assessment framework for considering the rule change request
- current market conditions relevant to the Commission's consideration of the rule change request
- summary of the Commission's reason for not making a rule.

Further information on the legal requirements for making this final rule determination is set out in appendix b.

2.2 Rule making test

2.2.1 Achieving the NERO

The Commission may only make a rule if it is satisfied that the rule will, or is likely to, contribute to the achievement of the national energy retail objective (NERO).¹⁴ This is the decision-making framework that the Commission must apply.

The NERO is:¹⁵

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.

The Commission must also, where relevant, satisfy itself that the rule is "compatible with the development and application of consumer protections for small customers, including (but not limited to) protections relating to hardship customers" (the "consumer protections test").¹⁶

Where the consumer protections test is relevant in the making of a rule, the Commission must be satisfied that both the NERO test and the consumer protections test have been met.¹⁷ If the Commission is satisfied that one test, but not the other, has been met, the rule cannot be made.

There may be some overlap in the application of the two tests. For example, a rule that provides a new protection for small customers may also, but will not necessarily, promote the NERO.

¹⁴ Section 236(1) of the NERL.

¹⁵ Section 13 of the NERL.

¹⁶ Section 236(2)(b) of the NERL.

¹⁷ That is, the legal tests set out in s. 236(1) and (2)(b) of the NERL.

2.3 Assessment framework

In assessing the rule change request against the NERO, the Commission has considered the following principles:

- **Enhancing customer information and decision-making** — it is important from the perspective of consumer rights and for a well-functioning retail market that customers have sufficient information on their bill to understand the product, the calculation of amounts due and to choose between multiple market offerings.
- **Competition between retailers** — under the current arrangements retailers compete to provide differentiated bundles of services that are most valuable to customers. Where competition is effective, retailers have strong incentives to provide the bundle of services that customers value and set prices that reflect the efficient costs of doing so. At present, this competition extends to different commercial practices including the disclosure of start and end meter readings in the bill and customers have the option to shop around depending on what information they expect to see in their bill and alternative information methods available.
- **Transparency and trust in retailers** — the extent to which the rule change would increase transparency and enhance trust in the industry and promote confidence in retailers.
- **Regulatory and administrative burden** — mandating that retailers include start and end meter readings on interval meter customers' bills may involve changes to billing systems for some retailers. These additional costs may be passed through to consumers.

The proposed rule change was assessed against the relevant counterfactual of not making the proposed change to the NERR. That is, against the current framework whereby retailers are permitted not to display start and end meter readings in the bill for customers with interval meters when the metering data required is not reasonably available.

2.4 Context within which the rule change request was assessed

The rule change request was evaluated against the assessment framework set out above and whether the proposed rules would, or be likely to contribute to the achievement of the NERO. However, it is important to understand the broader context (developments on metering) within which the rule change was assessed.

The technological developments on metering are key in understanding the issues raised in the rule change request and the proposed solution.

Historically, electricity consumption for small customers was recorded using accumulation meters. These type of meters provide a single cumulative number that increases with kWh consumed since the meter is installed. This number (cumulative reading) is extracted from the meter every billing period, approximately every 3 months. To bill customers, retailers subtract the actual (latest) cumulative reading from the previous cumulative reading. These two numbers will appear on the bill as previous reading and current reading (start and end meter readings).

Therefore, with an accumulation meter, if customers would like to reconcile their bill by directly reading the meter, they would be able to do the same exercise as the retailer. The customer would have to read its meter at the end of each billing period and subtract the current consumption in the bill to see if it matches. However, it is relevant to note that the customer would have to know the date when the meter is read for billing purposes and if this date is not certain, the customer might find differences.

By contrast, interval meters record consumption every 30 minutes (some have 15-minute intervals) and advanced interval meters provide this data remotely.¹⁸ Interval meter data is stored by aggregating 30-minute interval net data streams.¹⁹ Each MDP delivers this interval net data streams to AEMO and retailers and once retailers receive it, it is used for billing purposes. Therefore, cumulative meter readings are not collected for billing purposes for customers with advanced interval meters.

Additionally, if a customer is on a time-of-use or demand tariff, retailers will calculate the bill by applying the tariff to each interval data stream or group of interval data streams, depending on the customer's tariff structure and the terms and conditions of the contract. For example, each retailer specifies the time (hour) for peak, shoulder and off-peak tariffs. Therefore, the cumulative meter reading is not used to bill customers with interval meters and applying each tariff to interval readings adds another layer of complexity if a customer wants to reconcile the bill with the number displayed in the meter.

Because interval meters and accumulation meters collect different consumption information (interval v. cumulative data) this is displayed in the meter accordingly. While an accumulation meter screen only displays one cumulative consumption, an interval meter displays more than one number. Depending on the type of meter and the customer's tariff structure, the screens can be set to display peak, off-peak (if applicable) and solar (if applicable). Even if interval meters display a cumulative reading, this number is not used to bill customers.

Another difference between accumulation meters and advanced interval meters is that interval meters can be re-set for a number of reasons. This may occur, for example, when the meter is reprogrammed, probed, there are firmware updates or the meter is reconfigured for solar installations, among others. This operational difference means that the metering data displayed in the meter's screen will re-start and the cumulative reading would no longer match the start and end meter readings displayed in the bill.

With the introduction of advanced interval meters, substituted data and estimated data is much less likely to happen.²⁰ However, if interval data is not collected as a result of technical issues, such as connection problems, and substituted data is used, the cumulative number displayed in the meter's screen will no longer match the start and end meter readings in the bill. This is another circumstance where the customer might find a difference between the meter readings displayed in the bill and what he reads in the meter.

¹⁸ Many of the advanced interval meters are capable of providing consumption data on a more frequent (up to 5-minute) basis.

¹⁹ AEMO, *Service Level Procedure: Metering Data Provider Services*, sections 3.6 and 3.7.

²⁰ Consumers with advanced electricity meters that are capable of being remotely read are very unlikely to receive an estimated read bill. AEMC, *Estimated Meter Reads*, final determination, p. 32.

In conclusion, if a customer with an interval meter attempts to reconcile the bill in the way it is done with accumulation meters, the number that they see in their meter may be different from the start and end meter readings displayed in the bill for several reasons. Additionally, as it happens with accumulation meters, the customer will also have to know when the meter is read or the data is collected. Therefore, the reconciliation exercise with interval meters would not be as straight forward as it is with accumulation meters.

2.5 Summary of reasons for not making a rule

The rule change request has been evaluated against the assessment framework set out above. Having regard to the issues raised in the rule change request and during consultation, the Commission is not satisfied that the proposed rule will, or is likely to, contribute to the achievement of the NERO at this time. On this basis it has determined not to make the proposed rule.

The Commission considered, when assessing this rule change request, whether the underlying issues raised by the proponent are best addressed by competitive market interactions or changes to the rules. The materiality of the issue raised by the rule change request was found to be insufficient to make the proposed change. The analysis indicated that:

- Not including start and end meter readings in the bill is not a material issue for most electricity customers with interval meters.
- Start and end meter readings would be insufficient to allow customers with interval meters to reconcile their bills. The proposed change could have an unintended consequence of increasing consumer confusion, considering that such meter readings would not always correspond to the customer's energy usage (as interval meters measure usage in intervals and not on a cumulative basis).
- There are alternative market measures that can assist in achieving the purpose of the rule change request. The market already offers various tools for customers to verify their energy consumption that are more effective than the proposed rule change. The current rules also provide an adequate framework that assists consumers in case they need additional support to check their bill or their meter.
- It is not likely that including start and end meter readings in electricity bills would increase trust or transparency in the market. Therefore, the increased levels of regulatory and administrative costs that would arise if a rule is made would not be justified.

3 COMMISSION'S ASSESSMENT

Having regard to the issues in the rule change request, submissions from stakeholders and the analysis below, the final determination is consistent with the draft determination in deciding not to make the proposed rule. No new evidence has been put forward that could alter the Commission's conclusion.

3.1 Prevalence of the issue

The rule change request suggested that the fact that small electricity customers with an advanced interval meter cannot (always) find in their bill a meter reading for the start and end of the billing period is a material issue for customers as it does not facilitate billing reconciliation or improve customers' trust in the market.

3.1.1 Stakeholder views — submissions to consultation paper

The Commission received 15 submissions from stakeholders on the first round of consultation on the rule change request.²¹

Submissions that oppose a rule being made

In relation to the materiality of the issue raised in the rule change request, some stakeholders considered that the issue is not material and is not likely to become more prevalent over time.²² The main arguments raised by stakeholders include:

- The issue is immaterial given that the quantity of customers that complain about not being able to see start and end meter readings in their bill is very low.²³
- The issue is likely to become less prevalent over time as consumers are getting more familiar with advanced interval meters and the tariff structures available in the market.²⁴ EnergyAustralia argued that with a greater push for cost reflective tariffs, it is understandable that there will be a reduction in the single rate tariffs and corresponding reduction in the need for start and end reads.²⁵
- Customers have various ways of verifying their energy usage with the information provided in the bill (historical consumption graphs, total consumption). They can also

21 AGL, Alinta, Aurora Energy, EnergyAustralia, Energy Queensland, ERM Power, Energy and Water Ombudsman NSW (EWON), Energy and Water Ombudsman Queensland (EWOQ), Dr Martin Gill, Momentum Energy, Nathaniel Sawyer, Origin, Public Interest Advocacy Centre (PIAC), Powershop, Red and Lumo.

22 Submissions to consultation paper: AGL, p. 4; Alinta, p. 1; EnergyAustralia pp. 1-2; Energy Queensland pp.5-8; ERM Power, pp. 1-3; Dr. Martin Gill, p. 1; Momentum Energy, pp. 1-2; Nathaniel Sawyer, p. 1; Red and Lumo, p. 3.

23 AGL indicated that it received limited complaints directly related to the index reads and to verifying energy usage shown in bills (consultation paper submission, p. 4); Energy Queensland indicated that their Retail Customer Solution Centre and billing teams (Ergon Energy) received very few queries (four since 1 December 2017) in relation to start and end meter readings on electricity bills from customers with interval meters and that those were successfully resolved utilising existing mechanisms (consultation paper submission, p. 6); EnergyAustralia received 8 internal and Ombudsman complaints related to this issue (consultation paper submission, pp.1-2); ERM Power stated that has not received any complaints from customers regarding start and end billing period data (consultation paper submission, p.4); Dr Martin Gill, consultation paper submission, p.1.

24 Submissions to consultation paper: Alinta, p. 2; Energy Queensland, p. 6; Momentum Energy, attachment p. 2.

25 EnergyAustralia, consultation paper submission, p. 4.

request billing information,²⁶ or meter testing and billing review²⁷ under the NERR and, with other tools available for consumers to verify their consumption, the issue is likely to become less prevalent over time.²⁸

Some stakeholders mentioned additional considerations, as follows:

- Momentum Energy argued that most customers do not use or have a need to validate their bill with their meter via the start and end index reads. Benchmark validation can readily be undertaken using the same time last year average consumption or the previous month's consumption graph.²⁹
- Red and Lumo were of the view that if a customer remains concerned regarding the accuracy of the meter, they can request that the meter provider (or the distributor in Victoria) undertake a meter accuracy test.³⁰
- This position was supported by Origin, which considers that the current rules provide the necessary safeguards to allow a customer to question their bill in the event that they are concerned about its accuracy.³¹

Submissions that support a rule being made

While stakeholders generally considered that the issue raised in the rule change to be immaterial, some stakeholders supported the proponent's perspective. The following were their main comments:

- The issue raised in the rule change request is material to specific customers. Customers complain to Ombudsman agencies because they are expecting to see start and end meter readings on the bill.³²
- Not having the start and end meter readings adds complexity to customers who want to reconcile their bill before the payment is due. This is to take advantage of some commercial benefits offered by retailers such as 'Pay on Time' discounts.³³
- The current rules do not facilitate the level of consistency and transparency that consumers require in the provision of usage and billing information.³⁴
- The tools provided by retailers are not comprehensive, may lead to errors and the level of information is not acceptable to assist customers. It does not include simple language and is not easy to interpret.³⁵

The Energy and Water Ombudsman NSW (EWON) mentioned that when dealing with a complaint about a high bill, it often emerges that a customer was not aware that the

26 NERR, part 2, rule 28, 56B.

27 NERR, part 2, rule 29.

28 Submissions to consultation paper: EnergyAustralia, p. 2; ERM Power, p. 1; Momentum Energy, attachment p. 2; Nathaniel Sawyer, p. 2.

29 Momentum Energy, consultation paper submission, p. 2.

30 Red and Lumo, consultation paper submission, p. 3.

31 Origin, consultation paper submission, p. 2.

32 Submissions to consultation paper: EWON, p. 1; EWOQ, p. 1.

33 EWON, consultation paper submission, p. 2.

34 Public Interest Advocacy Centre, consultation paper submission, p. 1.

35 Submissions to consultation paper: EWON, p. 2; EWOQ, p. 2.

transition to a digital meter would result in the loss of start and end meter readings on their bill. It considers that this can lead to a lack of consumer confidence, particularly when consumers are required to 'trust' that their retailer has billed them correctly.³⁶

The Energy and Water Ombudsman Queensland (EWOQ) is of the view that start and end meter readings should be included in energy bills for all customers, regardless of where they reside or their meter type.³⁷

Powershop was the only retailer who supported that a rule change should be made by removing the transitional rule. It noted that Powershop already provides the start and end meter readings in the bill for all of its customers in the national electricity market (NEM) and mentioned it was not aware that this was an issue for smart meter customers. In addition, it was of the view that this issue would become more prevalent over time given the increased take-up of advanced interval meters.³⁸

3.1.2

Stakeholder views — submissions to draft determination

The Commission received 11 submissions from stakeholders on the second round of consultation on the rule change request.³⁹

Submissions that oppose a rule being made

Stakeholders generally considered that the issue raised in the rule change request does not appear to be a material issue for most customers with interval meters. In addition, stakeholders also agreed with the analysis carried out by the Commission in the draft determination, and supported that the issue is not material and is not likely to become more prevalent over time.⁴⁰

PIAC initially supported the rule change proposal, however, in their submission to the draft determination, PIAC supported the Commission's decision that a rule change, as proposed, is not warranted at this time. PIAC considered that there is no likely material benefit to proceeding further with the rule change process given the technical realities of interval metering and the limited potential benefits for consumers.⁴¹

Submissions that support a rule being made

In relation to the materiality of the issue raised in the rule change request, stakeholders did not provide any additional data or evidence to support that issue is material for the customers with interval meters. The proponent (Mr Craig Whybrow) and EWOQ, who supported a rule is made, mentioned in their draft determination submissions that the rule change would have provided greater outcomes for customers.⁴²

36 EWON, consultation paper submission, p. 1.

37 EWOQ, consultation paper submission, p. 2.

38 Powershop, consultation paper submission, p. 1.

39 AGL, Alinta Energy, Aurora Energy, Craig Whybrow, Energy Australia, Energy Queensland, ERM Power, EWOQ, Origin Energy, PIAC, Red and Lumo.

40 Submissions to draft determination: Aurora Energy, p. 1; Energy Queensland, p. 1; Origin, p. 1; PIAC, p. 2; Red and Lumo, p. 2.

41 PIAC, draft determination submission, p. 2.

42 Submissions to draft determination: Mr Craig Whybrow, p. 1; EWOQ, p. 1.

3.1.3 Commission's assessment

The Commission did not receive new data or evidence to change the understanding of the materiality of the issue raised in the rule change request. Therefore, the Commission considered the evidence submitted by stakeholders to the consultation paper and analysed the number of customer complaints received, from Ombudsman agencies, for the draft determination.

As mentioned in the draft determination (see section 3.1.1), stakeholders were of the view that few customers with advanced interval meters find that not having the start and end meter readings in their energy bills is an issue.⁴³ The largest number reported by stakeholders, of customers complaining about a similar issue since the introduction of competition in metering on 1 December 2017, was eight complaints.⁴⁴

Additionally, the Commission sought to understand the scale, and likely future scale, of the issues raised by the rule change proponent using complaints data sent by Ombudsman agencies. For the data analysis, as the different Ombudsman agencies do not have a specific category for the issue raised by the rule change proponent, we instead present data for the nearest proxy in each jurisdiction. As such, the data in this chapter is intended to provide an *indication* of the level of complaints relating to billing of advanced interval meter customers and should not be relied upon as an exact measure of the issue.

In New South Wales (NSW), EWON received 20 complaints last financial year related to the issue raised in the rule change request, compared to a total of 285 complaints related to advanced interval meters.⁴⁵ In South Australia (SA), the Energy and Water Ombudsman of South Australia (EWOSA) received around 6 complaints last financial year related to this issue from a total of 2,185 complaints related to other metering issues (~0.2%).⁴⁶

To analyse if the issues were systemic across advanced interval meter customers, it would be expected that the number of complaints relating to the issue would increase in proportion to the number of advanced interval meters. The following figures illustrate the number of advanced interval meters installed in NSW and SA (left vertical axis), and the number of complaints received by EWON and EWOSA related to advanced interval meters (right vertical axis).

New South Wales

In NSW, there has been a steady level of complaints in the category "advanced interval meter - billing". On average EWON received 75 complaints per quarter for the period March 2017 to December 2018 (see Figure 3.1). It should be noted that the number of complaints relating to the specific issues raised by the rule change proponent are only a subset of these complaints. The number of complaints has remained relatively flat despite the number of

43 Submissions on consultation paper: AGL, p. 4; Alinta, p. 1; Energy Queensland, p. 6; ERM Power, p. 3; Red and Lumo, p. 4; Powershop, p. 2.

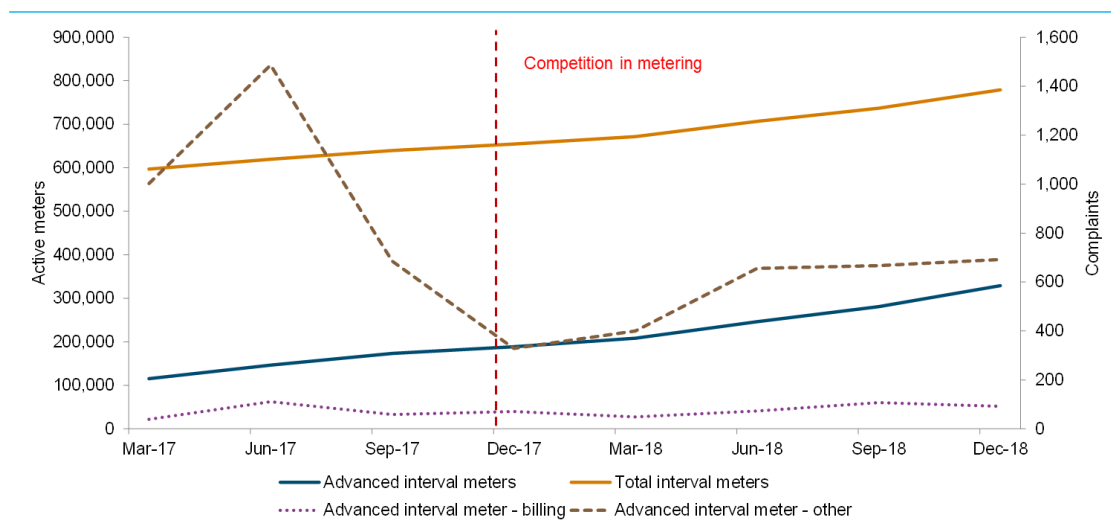
44 EnergyAustralia, consultation paper submission, p. 2.

45 EWON, complaints data received by email on 7 February 2019, in response to AEMC request.

46 EWOSA, complaints data received by email on 18 February 2019, in response to AEMC request.

advanced interval meters increasing substantially over this period (from around 115,000 to 329,000).

Figure 3.1: NSW advanced interval meter take-up v. customer complaints



Source: AEMO MSATS and EWON, complaints data received by email on 7 February 2019, in response to AEMC request.
Note: The category 'Advanced interval meter - billing' are those complaints with a primary issue 'digital meter exchange' and secondary issue 'billing' in EWON's annual report.

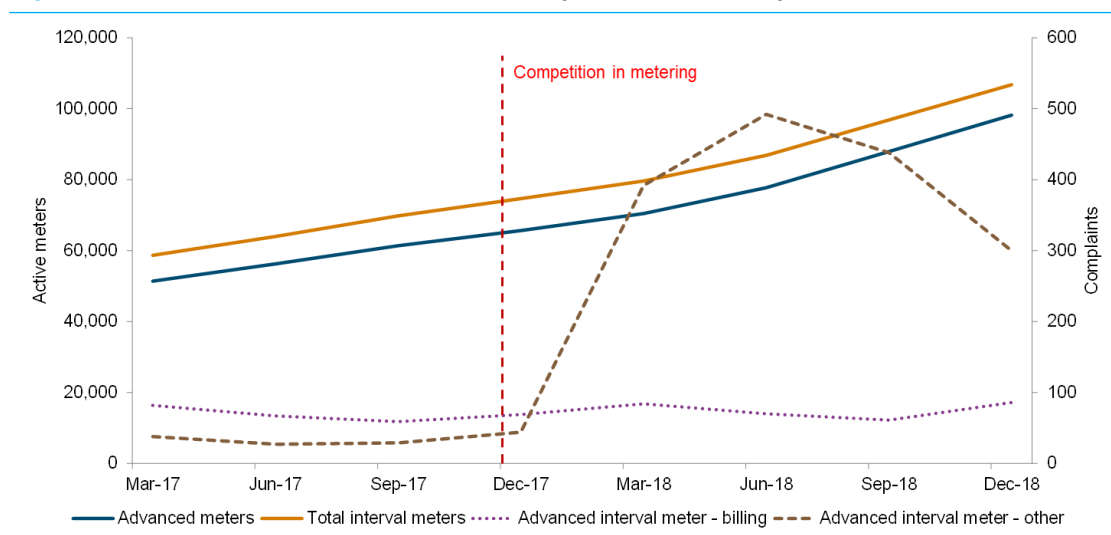
Based on the rate of complaints in NSW, the Commission observes that the scale of the issue is not increasing with the number of installed advanced interval meters and that therefore it is not expected that the scale of the issue will increase over time.

South Australia

Similarly, Figure 3.2 presents data from EWOSA showing that the number of complaints relating to billing for advanced interval meters, the subset related to the rule change request, remained steady around an average of 72 per quarter for the period March 2017 to December 2018. Over the same period the number of advanced interval meters in the State increased by around 90% (from 51,000 to 98,000). The spike in complaints relating to other issues is due to a sharp increase in complaints classified as 'delays'.⁴⁷

⁴⁷ The AEMC completed a rule determination to provide customers with new or replacement electricity meters within set time frames. AEMC, *Metering installation timeframes*, final determination, 6 December 2018.

Figure 3.2: SA advanced interval meter take-up v. customer complaints



Source: AEMO MSATS and EWOSA, complaints data received by email on 18 February 2019, in response to AEMC request.
Note: Complaints figures based on EWOSA analysis of advanced interval meter complaints.

We note that the number of billing complaints for advanced interval meters has not increased in line with the number of advanced interval meters in South Australia.

Overall, we observed that the number of complaints is stable, with a fall in complaints as a proportion of the amount of advanced interval meters installed. Based on these figures the Commission also expects that the materiality of the issue raised by the rule change proponent is unlikely to increase in the future.

Additionally, as mentioned by stakeholders (see Table 3.1), there are a range of tools available for customers with advanced interval meters to access and track their energy consumption, including on a real-time basis.⁴⁸ Moreover, the NERR already provides different consumer protections for consumers to request their energy usage,⁴⁹ check their bill⁵⁰ and their metering data.⁵¹

In conclusion, given the issue raised by the proponent only affects a small number of customers, and with the various tools and protections available in the market to support them, the Commission is of the view that the issue raised in the rule change request is not a material issue for energy customers with interval meters. In addition, the issue will have diminished importance over time as energy management tools and solutions continue to emerge in the market and consumers become accustomed to advanced interval meters and the tools available to them.

48 Online portals, mobile applications, online guides, home devices, etc.
49 NERR, part 2, rule 28.
50 NERR, part 2, rule 29(1).
51 NERR, part 2, rule 29(5).

3.2 Other issues raised in the rule change request

The proponent also mentioned other issues based on his experience with advanced interval meters:

- retailers do not provide enough information for customers to understand how to read their new smart meters correctly
- the electricity market is not transparent about the change in information when an advanced interval meter is installed (installation procedures and use).

Even though these issues are not directly related to the key issue raised in the rule change request, the Commission was of the view that they should also be consulted on, so they were included in the consultation paper.

3.2.1 Stakeholder views — submissions to consultation paper

EWON noted that many digital meters are capable of being read by customers and that some retailers publish guidelines on 'how to read your meter' on their websites. However, it considers that these instructions are often not comprehensive and may lead to consumer error. In addition, EWON found that many customers, such as those residing in apartment complexes, do not have access to their meter.⁵²

Additionally, EWON noted that some retailers provide online access to customer meter data which helps customers reconcile bills. However, many retailers do not provide these tools and there are some customers who do not have access to internet.⁵³

EWOQ made similar observations, noting that there are retailer websites that contain 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 does not provide an acceptable level of assistance. This lack of information results in customers contacting EWOQ to provide support. Additionally, it is EWOQ's understanding that customers are currently not provided with any information regarding interval metering.⁵⁴

In addition, EWOQ was of the view that retailers should provide easy to interpret (non-technical) fact sheets, utilising info-graphics and simple language to assist customers in understanding advanced interval meters. Further, it considered that 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 also be provided.⁵⁵

52 EWON, consultation paper submission, p. 2.

53 EWON, consultation paper submission, p. 2.

54 EWOQ, consultation paper submission, p. 2.

55 EWOQ, consultation paper submission, p. 2.

3.2.2

Commission's assessment

How to read advanced interval meters

With the introduction of advanced interval meters in the NEM, different retailers have included on their websites instructions and explanations on how to read advanced interval meters, such as online portals, videos and frequently asked questions (FAQs). Other market participants, such as Ombudsman, publish 'tips', FAQ sheets and online guides explaining how to read advanced interval meters, the responsible parties for smart meter reading and how smart meter data is collected and verified.

Information about the use of advanced interval meters and installation procedures

The AER has a web page specifically for general inquiries on advanced interval meters.⁵⁶ The portal includes installation procedures, potential problems and benefits for consumers. There is a case study to illustrate how customers can use and benefit from advanced interval meters. Different Ombudsman publish on their websites the relevant issues for customers to consider when having advanced interval meters installed, the benefits and retailer's responsibilities (FAQ sheets). Other governmental authorities, such as NSW Fair Trading, provide specific information on advanced interval meter requirements, installation requirements and responsibilities and metering service rules.⁵⁷

The Commission found that most retailers offer tools to help customers understand how advanced interval meters work.⁵⁸

Some retailers have developed online guides to help customers understand their meter and their energy bill; there has been investment in developing mobile applications for customers to access real-time energy usage information; and to offer new appliances to monitor energy usage. Advanced interval meters provide scope for retailers to offer more innovative products and new 'add on' energy management services.⁵⁹

Therefore, the Commission considers that the market, through retailers and other market participants, such as Ombudsman agencies, regulators and state governments, is providing enough information for customers to understand advanced interval meters and that with more innovations being introduced, more information is expected to be available. On this basis, the Commission has decided not to make a draft rule to address these issues.

3.3

Potential solutions

Although the Commission has decided not to make a rule, the consultation paper did consider potential solutions to the issue raised in the rule change request. This section summarises stakeholders views and the analysis of these potential solutions. The potential solutions were:

⁵⁶ AER, <https://www.aer.gov.au/consumers/my-energy-service/smart-meters>.

⁵⁷ NSW Fair Trading, <https://www.fairtrading.nsw.gov.au/trades-and-businesses/business-essentials/information-for-specific-industries/smart-meter-providers> ; Queensland Government, <https://www.qld.gov.au/housing/buying-owning-home/energy-water-home/electricity/digital-meters/digital-meter-installation>

⁵⁸ See Table 3.1.

⁵⁹ AER, *State of the energy market 2018*, p. 32.

Eliminate the transitional rule

This amendment to the NERR would involve eliminating the transitional rule,⁶⁰ which allows retailers not to display the start and end meter readings of the billing period when the required metering data is not reasonably available. Under this option, all retailers would have to include in their bills the start and end meter readings for each billing period regardless of the customer's metering type.

Adopt the Victorian solution

The Victorian Essential Services Commission (ESC) modified the Victorian Energy Retail Code requiring retailers to include a start and end index read on bills for advanced interval meter customers from 1 July 2012.⁶¹ Under this option, all retailers would have to include in their bills start and end index reads of each billing period for customers with smart meters.⁶²

Alternative solutions

The Commission was also interested in exploring other potential solutions and considered the Consumer Data Right (CDR) as a potential solution to the issue raised in the rule change request. As noted in the consultation paper, the Government is implementing a CDR in banking, electricity and telecommunications as part of its commitment to giving Australians greater control over their data.⁶³ With the introduction of the CDR, it is expected that customers will be able to give the relevant authorisation for a third party to access their data and help them make decisions on the options available in the market and to find an offer that best suits them. For example, customers could be provided with the lowest market offer available given their consumption profile, advice on solar and battery take-up, or the provision of bill checking services.

3.3.1 Proponent's view

The proponent's solution is to require all energy retailers to include in their bills a start and end meter reading for each billing period for advanced interval meter customers. To implement this solution the NERR would need to be amended.

3.3.2 Stakeholder views — submissions to consultation paper

The majority of stakeholders opposed the implementation of the potential solutions raised in the consultation paper.

Most retailers highlighted that including start and end meter readings in energy bills would introduce additional costs with no benefits for customers and that it might, on the contrary, lead to more confusion or reduce customer trust.⁶⁴

60 NERR, schedule 3 Savings and transitional rules, part 4, rule 8(3).

61 The index read is the total accumulated energy for a data stream retrieved from a meter's register at the time of the meter reading event. AEMO, Metering data file format specification, NEM12 & NEM13.

62 Victorian Energy Code, section 25(1)(y).

63 AEMC, *Bill contents — customers with interval meters*, consultation paper, p. 19.

64 Submissions to consultation paper: Alinta, p. 1; AGL, p. 1; Aurora Energy, p. 1; EnergyAustralia, p. 3; Energy Queensland, attachment p. 2; ERM Power, p. 2; Dr Martin Gill, p. 2; Nathaniel Sawyer, p. 3; Momentum Energy, p. 2; Origin, p. 2; Red and Lumo, p. 1.

EWON supported that a rule is made. However, it did not specify a preferred solution, i.e. eliminate the transitional rule or adopt the Victorian solution. EWON did comment that retailers should display these values given that the data is considered to be always 'reasonably available', considering that they are required to provide start and end reads on invoices for customers in Victoria pursuant to the requirements of the Victorian Energy Retail Code. It also noted that there are several retailers that already include start and end reads on bills for their NSW customers.⁶⁵

Eliminate the transitional rule

Stakeholders mentioned that there is an overarching technical difference between interval meters and accumulation meters that must be considered when deciding to include start and end meter readings in energy bills. Interval data is used by retailers to bill customers with interval meters. Once it is collected, retailers will apply each customer's tariff structure (flat, block, time-of-use and demand tariffs) to calculate the bill. Even if these meters record a cumulative reading, this number is not used to bill customers. In contrast, accumulation meters only collect cumulative readings. Once this single number is collected, retailers apply a single rate tariff; this cumulative number is the only number retailers use⁶⁶ to bill customers with accumulation meters.⁶⁷

Stakeholders noted there are two key reasons why start and end meter readings from interval meters will not help customers understand and reconcile their bills, and indeed why the inclusion of such information on bills may lead to increased confusion or reconciliation difficulty:

1. Advanced interval meters can be re-set periodically for different reasons, which is not the case with accumulation meters. For example, these meters can be re-set to zero when the meter is reprogrammed, probed, the data is downloaded, firmware updates are installed, meters are exchanged or when the meter needs to be reconfigured for solar panel installations, among other activities. Another situation where a meter might be re-set is when the 5-minute settlement rule commences. This may affect a substantial number of customer meters. Consequently, the cumulative number displayed in the meter may not correspond to the meter data used by retailers to bill customers.⁶⁸
2. When estimated data is used for billing purposes,⁶⁹ the consumption displayed in the bill will not match the start and end meter readings in the bill and neither will match the number displayed in the screen of the meter.⁷⁰

AGL is a retailer that includes start and end meter readings in their customer bills in all jurisdictions in the NEM. However, it acknowledged that these are only reference readings, and customers are advised that the reference reads are a 'guide only' and that they cannot

65 EWON, consultation paper submission, p. 1.

66 Unless the bill is an estimated bill, as it was discussed in section 2.4.

67 Submissions to consultation paper: Aurora Energy, p. 2; EnergyAustralia, p. 3; Energy Queensland, p. 4.

68 Submissions to consultation paper: AGL, p. 2; Red and Lumo, p. 1.

69 Consumers with advanced electricity meters that are capable of being remotely read are very unlikely to receive an estimated read bill. AEMC, *Estimated Meter Reads*, final determination, p. 32.

70 Submissions to consultation paper: Alinta, p. 1; Aurora Energy, p. 2; Momentum Energy, p. 5; Origin, pp. 2-3.

verify their bill with these values.⁷¹ AGL also mentioned that there are circumstances where start and end meter readings are not provided to them (either by the distributor or the Metering Data Provider). In these instances, the customer might have received a 'N/A' displayed in the start and end readings fields within the bill.⁷²

Alinta considered that there is limited benefit (but material implementation costs) associated with the rule change request and does not believe it should be made at this time.⁷³ It also mentioned that adding potentially inaccurate data to bills (from a financial settlement perspective) in the form of index reads will not contribute to the NERO or build customer confidence in the market if it subsequently results in complaints and additional costs.⁷⁴

Aurora Energy was of the view that a customer's need for bill transparency can easily be provided without requiring a physical interaction between the customer and their meter.⁷⁵ It also mentioned that for advanced metered customers, maintaining start and end reads becomes an artificial construct to support a legacy billing model. It noted that in some cases, maintaining start and end reads may reduce transparency rather than enhance customer confidence in meter data.⁷⁶

EnergyAustralia noted that if a rule is made, its preferred option is to remove the transitional rule in the NERR, as this would give some flexibility to retailers on how to present the information, as opposed to the prescriptive option adopted in Victoria.⁷⁷

ERM Power considered that the rule change is seeking to provide billing transparency solutions which are misplaced. Advanced interval metering technology is accompanied by a suite of innovative solutions for customers to analyse and manage their consumption data. A billing requirement intended to mimic type 6 meter read values does not improve quality of information for consumers and is not appropriate for new technologies.⁷⁸

The majority of stakeholders were of the view that eliminating the transitional rule would not achieve the expected outcomes to facilitate bill reconciliation and neither would it improve customer trust or transparency in the market, as suggested by the proponent.⁷⁹

However, some stakeholders were of the view that a rule should be made.⁸⁰ The reasons mentioned were the following:

- PIAC commented that including start and end meter readings in all energy bills would increase transparency in the market and trust in retailers. It claimed this requirement is a simple, understandable and consistent piece of information that consumers are

71 AGL, consultation paper submission, p. 2.

72 AGL, consultation paper submission, p. 5.

73 Alinta, consultation paper submission, p. 5.

74 Alinta, consultation paper submission, p. 4.

75 Aurora Energy, consultation paper submission, p. 1.

76 Aurora Energy, consultation paper submission, p. 2.

77 EnergyAustralia, consultation paper submission, p. 3.

78 ERM Power, consultation paper submission, p. 2.

79 Submissions to consultation paper: Alinta, pp. 2-4; AGL, p. 6; Aurora Energy, p. 2; EnergyAustralia, p. 4; Energy Queensland, p. 5; ERM Power, p. 2; Dr Martin Gill, p. 2; Nathaniel Sawyer, p. 4; Momentum Energy, p. 3; Origin, p. 1; Red and Lumo, p. 1.

80 Submissions to consultation paper: EWON, p. 1; EWOQ, p. 2; PIAC, pp. 1-2; Powershop, p. 2.

accustomed to. PIAC considered that the solution that should be adopted is elimination of the transitional rule. PIAC was of the view that the administrative burden is a minor element relative to the benefits to customers.⁸¹

Powershop stated that eliminating the transitional rule is the cleanest and most effective solution to solve the issue raised in the rule change request.⁸²

Adopt the Victorian solution

Retailers suggested a similar set of issues as for the transitional rule solution, more relevant to the Victorian solution.

- Some stakeholders considered that the Victorian solution did not improve customer's trust, increase transparency or support customers to reconcile their bill.⁸³
- EnergyAustralia indicated the issue to be one for a competitive market to deal with and that customer preferences, observed through churn, will deliver the best outcomes for customers.⁸⁴
- AGL stated that reference readings are not a logical reference point for customers that have pricing structures based on load shape and profile, i.e. time-of-use and in future demand pricing, where a different rate can be charged based on the time the consumption is used.⁸⁵
- Even though Momentum Energy did not support a rule to be made, it commented that if a rule is made, then the Victorian solution would minimise billing, metering and market system changes for retailers, given all retailers in Victoria have already adjusted their system to comply.⁸⁶ Momentum also noted that the implementation of index reads in Victoria was intended to minimise the negative sentiment that accompanied the mandatory roll-out of advanced interval meters and that the Code was modified without considering how consumers may utilise this data.⁸⁷
- Origin mentioned that 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. Origin considered that 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' meter.⁸⁸

Red and Lumo considered that a negative impact from the Victorian solution is that questions have been raised regarding the accuracy of the data from index reads. It noted that

81 PIAC, consultation paper submission, pp. 1-2. PIAC's supported the Commission's decision of not making a rule in their submission to the draft determination, for further details please see section 3.3.3.

82 Powershop, consultation paper submission, p. 2.

83 Submissions to consultation paper: Alinta, p. 1; EnergyAustralia, p. 3; ERM Power, p. 2; Momentum Energy, p. 1; Red and Lumo, p. 6.

84 EnergyAustralia, consultation paper submission, p. 4.

85 AGL, consultation paper submission, p. 5.

86 Momentum Energy, consultation paper submission, p. 3.

87 Momentum Energy, consultation paper submission, p. 5.

88 Origin, consultation paper submission, p. 1.

customers with advanced interval meters have made complaints regarding the accuracy of start and end meter readings index reads.⁸⁹

Alternative solutions

Consumer Data Right

The majority of stakeholders considered that the CDR framework could be an additional avenue to support customers in decision-making through third parties and it is likely that it would address some of the issues raised in this rule change request. However, further information will be required to understand the specific impacts of the reforms.⁹⁰

EnergyAustralia, however, noted that the rule change request did not imply that access to the data (start and end read, or total consumption) was refused, and therefore was of the view that the CDR reform would not address the proponent's concerns; unless it specifically requires retailers to put the start and end read on bills.⁹¹

Other alternatives

Most stakeholders did not provide a specific alternative solution, however they all mentioned that there are various tools currently available for customers to aid in the understanding and tracking of their energy consumption; to understand how the different meters work and what is displayed on the screens; and how to read their meter and their bill. Table 3.1 lists the different tools offered by each retailer for customers with advanced interval meters.

Table 3.1: Other tools/solutions available for customers with advanced interval meters

STAKEHOLDER	OFFERED TOOLS
AGL	<ul style="list-style-type: none"> • Online guide "Your energy bill explained" • Online and mobile application to set up "My account" and monitor energy usage • AGL's Customer Service Centre for support to verify energy bills • Online Energy Insights Report where customers can see a tailored report on their energy consumption, tips to be more efficient based on usage patterns.
Aurora Energy	<ul style="list-style-type: none"> • Mobile-based application to track energy consumption on a daily basis.
EnergyAustralia	<ul style="list-style-type: none"> • Mobile application 'my account' to allow customers download daily, monthly and annual usage data. Includes breakdown of different streams, consumption and generation.
Energy Queensland	<ul style="list-style-type: none"> • Digital platform that enables customers to download up to two years of billing information (access raw interval meter data and

⁸⁹ Red and Lumo, consultation paper submission, p. 5.

⁹⁰ Submissions to consultation paper: AGL, p. 6; Alinta, p. 4; Energy Queensland, p. 6; ERM Power, p. 2.

⁹¹ EnergyAustralia, consultation paper submission, p. 4.

STAKEHOLDER	OFFERED TOOLS
	<p>diagrammatic representation for specific periods)</p> <ul style="list-style-type: none"> • Online guide to read and understand electricity bills, including video tour • Online interactive 'high bill' check-list to assist customers to understand why their bill may be higher than expected • Online energy use calculators to help customers understand energy usage, how much it costs and how they might manage their usage • Other channels to request billing and metering information (email, telephone or post).
Powershop	<ul style="list-style-type: none"> • Mobile applications and online portals with usage graphs, heat maps, solar usage information and self-meter read submission.

Source: Submissions to consultation paper: AGL, pp. 2-3; Aurora Energy, p. 2; EnergyAustralia, p. 2; Energy Queensland, attachment p. 3; Powershop, p. 2.

In addition, Origin mentioned that the concerns raised in the AEMC's consultation paper can be adequately addressed under the current regulatory framework.⁹² It also considers that that retailers need to accept ownership for educating customers about their energy usage and understanding their bills. It considers that better education and access to customer's interval usage will provide greater benefits to customers than changing bill contents requirements under the NERR.⁹³

3.3.3 Stakeholder views — submissions to draft determination

In its draft determination, the Commission concluded that it did not consider the proposed solution in the rule change request or the alternative solutions discussed in the consultation process are the most appropriate methods for addressing the issue raised by the proponent. No new evidence was put forward in submissions on the draft determination, therefore the Commission has not modified its conclusion.

Generally, stakeholders agreed with the Commission's conclusion that including start and end meter readings in bills for customers with interval meters could lead unintended consequences, without helping consumers to reconcile their energy bill. Stakeholders noted that the proposed rule has the risk to increase consumer confusion and therefore, reduce trust.⁹⁴

On the other hand, EWOQ noted in its submission to the draft determination that amending the current bill contents provision in the NERR (Rule 28) would have provided alignment

⁹² Origin, consultation paper submission, p. 2.

⁹³ Origin, consultation paper submission, p. 2.

⁹⁴ Submissions to draft determination: AGL, p. 1; Alinta, p. 2; Energy Queensland, p. 1; Origin, p. 1.

across jurisdictions given that Victoria currently has a similar requirement in their Retail Code.⁹⁵

3.3.4 Commission's assessment

Developments on metering

The Commission noted the technical differences between interval and accumulation meters with implications for customers and billing purposes (see section 2.4). To eliminate the transitional rule or adopt the index reads of Victoria, the Commission is aware of the following implications:

- Customers would not be able to reconcile their bill with interval meters as it is not as straight forward as it is with accumulation meters. Customers would find discrepancies between their meter and their bill.
- Some benefits of advanced interval meters digital capabilities also have drawbacks (from the traditional perspective), such as meter re-set, meter reprogramming, etc.
- An estimated bill, which is less likely to happen for customers with advanced interval meters, has discrepancies with the number that customers read on the meter's screen when reconciling the bill.

Analysis on the Victorian case

As noted in the consultation paper⁹⁶, the Victorian Essential Services Commission (ESC) published an issues paper in April 2010 to review the regulatory framework seeking to support advanced interval meters roll out and to protect customers in Victoria. The document included billing information as a key issue for consultation and the ESC considered that customers with advanced interval meters would need to be able to reconcile their usage with the charges on their bills. In December 2011, the ESC completed the review and published a final decision requiring retailers to include a start and end index read on bills for advanced interval meter customers from 1 July 2012.⁹⁷

The Victorian Energy and Water Ombudsman (EWOV) monitored the number of complaints during the advanced interval meter roll-out and published a report from 2008 to 2016. In its latest report, EWOV noted a decline in the number of complaints received. This decline was reported as "unsurprising" given that the advanced interval meter roll-out was effectively completed and became "business as usual" for consumers. Interestingly, EWOV continued to receive complaints from customers with advanced interval meters experiencing issues with the accuracy of their consumption data on their bills (customers continued to complain about advanced interval meter data formats and start and end meter readings on their bills).⁹⁸

In addition, the Commission received indicative data on the number of complaints related to index reads. The data indicates that billing reading issues are a minor issue for electricity

95 EWOQ, draft determination submission, p. 1.

96 AEMC, *Bill contents — customers with interval meters, consultation paper*, March 2019, p. 18.

97 EWOV, *Solar and Smart Meter Report*, final report, July 2016.

98 EWOV, *Solar and Smart Meter Report*, final report, July 2016, p. 5.

customers and that Victorian customers became more familiar with advanced interval meters after the roll out finalised. In addition, within the billing issues category, the change in the Victorian Code did not result in a direct reduction in the number of complaints relating to index reads, which remain a significant proportion of the billing reading issues. One reason for this could be that customers found start and end index reads confusing (as explained in section 2.4 and mentioned by stakeholders in their submissions). Therefore, what is proposed in the rule change is likely to be ineffective.

The Commission supports harmonising energy regulation wherever possible. As mentioned by EWOQ in their submission to the draft determination, modifying the NERR by introducing index reads as it was done in Victoria might have contributed to align energy regulation across jurisdictions. However, with the data received on the Victorian case, the Commission did not find that introducing index reads in Victoria is likely to be effective to provide greater benefits to consumers. Therefore, aligning Rule 28 across jurisdictions is not an end in itself but must be in the long-term interests of consumers and contribute, or likely to contribute, to the achievement of the NERO.

Improving customer information and transparency to enhance customers decision-making and trust in retailers

With the evidence collected from the Victorian market, the Commission is of the view that including start and end meter readings in bills is unlikely to enhance customer information and decision-making and therefore it is also unlikely to increase transparency or improve customer's trust in the industry. As noted by a number of stakeholders, it may actually increase confusion for customers. After reviewing the trend of complaints in Victoria, the Commission confirmed that customers are likely to become more familiar with advanced interval meters and alternative methods of understanding usage and bills, and therefore, start and end meter readings would become less relevant over time.

The Commission considers that the main challenge for the market should not be to maintain traditional measures, such as start and end meter readings, but to evolve and educate customers on the use of new technologies to bring them better outcomes. The Commission agrees with some stakeholders that, informing and introducing better tools for customers to help them understand advanced interval meters, is the preferred way forward to help them benefit from the innovations in the market.

Competition between retailers

The Commission considered when assessing this rule change request whether the underlying issues raised by the proponent are best addressed by competitive market interactions or changes to the rules.

Retailers compete to provide differentiated bundles of services that are most valuable to customers. Where competition is effective, retailers have strong incentives to provide the bundle of services that customers value and set prices that reflect the efficient costs of doing so. This competition occurs across a number of dimensions, including the provision of additional detailed usage and billing information.

The Commission also considers that the Consumer Data Right reform, even though still at an early stage of development, will facilitate access to metering data for customers, and authorised third parties, to support their decision-making on energy services. The CDR is expected to provide additional services that are more likely to increase trust and improve transparency in the market than including start and end meter readings.

Therefore, the Commission considers the market and the in-progress CDR process already provide alternative solutions that more effectively achieve the purposes of the rule change request.

Regulatory and administrative burden

Another important aspect that needs to be evaluated relates to the costs associated in making the rule.

Stakeholders provided limited information on the costs of including start and end meter readings in bills for all customers in the NEM. However, most stakeholders stated that mandating retailers to include the start and end meter readings in bills for customers with interval meters would involve a number of modifications that could impose additional costs for retailers.⁹⁹

For example, Energy Queensland noted that it would incur costs related to:¹⁰⁰

- billing system enhancements to facilitate the changes to meter data file formats
- metering data file format modifications
- changes to bill design / layout
- modification to systems used by MDPs to provide start and end meter readings
- other potential system changes to support any necessary amendments to AEMO's Metering Data Provision Procedures
- increased enquiries from customers experiencing difficulties reconciling an index read against the information displayed on their advanced interval meter.

The Commission considers that imposing these costs is not in the long term interest of consumers and that if a rule is made, these costs may be passed through to customers. Given that the proposed rule change might not enhance consumer information nor increase trust or transparency in the market as proposed by the proponent, the Commission is of the view that the costs of implementing the rule would outweigh the benefits of the rule change.

Other considerations

EWON also noted that there can be other situations where customers may not be able to easily reconcile their bill:

1. Sometimes customers have limited access to the meter (physically)

⁹⁹ Submissions to consultation paper: Alinta, p. 3; Aurora Energy, p. 1; EnegyAustralia, p. 3; Energy Queensland, pp. 1-2 and attachment p. 1; ERM Power, p. 2; Dr Martin Gill, p. 3; Momentum Energy, p. 3; Red and Lumo, p. 5.

¹⁰⁰ Energy Queensland, consultation paper submission, pp. 1-2 and attachment p. 1.

2. Some consumers do not have internet which means that they are not able to access online portals or tools to reconcile their bill.¹⁰¹

In regard to the first situation, the Commission is of the view that advanced interval meters were introduced in the market to offer more benefits than accumulation meters and that one of these benefits is the remote connection for meter reading. As previously mentioned (see Table 3.1), retailers are offering various tools for customers to access their energy consumption, such as online portals and mobile applications. Therefore, the Commission expects that the need to access the meter physically will decrease over time as more advanced interval meters are installed and new methods of accessing usage and billing data are developed.

In regard to the second situation, the Commission considers that providing start and end meter readings to those customers without internet connection is not likely to help them reconcile their bill, for the same reasons explored in section 2.4.

Conclusion

The proposed rule change has been evaluated against the assessment framework set out in section 2.3. Having regard to the issues raised in the rule change request and during consultation, the Commission is not satisfied that the proposed rule will, or is likely to, contribute to the achievement of the NERO at this time.

On this basis, the Commission has determined not to make a rule. The Commission is of the view that the materiality of the issue raised in the rule change request is insufficient to warrant the proposed benefits and has determined that the proposed change to the current bill content requirements in the NERR is not in the long-term interests of consumers.

¹⁰¹ EWON, consultation paper submission, p. 2.

ABBREVIATIONS

AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
CDR	Consumer Data Right
Commission	See AEMC
ESC	Victorian Essential Services Commission
EWON	Energy and Water Ombudsman New South Wales
EWOQ	Energy and Water Ombudsman Queensland
EWOV	Energy and Water Ombudsman Victoria
MDP	Metering Data Provider
MDPP	Metering Data Provision Procedures
NEM	National Electricity Market
NERL	National Energy Retail Law
NERO	National Energy Retail Objective
NERR	National Energy Retail Rules
PIAC	Public Interest Advocacy Centre

A SUMMARY OF OTHER ISSUES RAISED IN SUBMISSIONS

This appendix sets out the issues raised in the first round of consultation on this rule change request and the AEMC's response to each issue. If an issue raised in a submission has been discussed in the main body of this document, it has not been included in this table.

Table A.1: Summary of other issues raised in submissions

STAKEHOLDER	ISSUE	AEMC RESPONSE
Mr Craig Whybrow, p. 1.	Retailers should not be allowed to display reference meter readings in electricity bills that do not align with the actual consumption.	<p>The Commission analysed the issues related to including cumulative readings (start and end meter readings) in energy bills for customers where their consumption is metered with interval meters in section 2.4.</p> <p>The Commission is of the view that the metering developments and the changes introduced to the market with interval meter deployment explains why retailers are including reference meter readings in electricity bills; there are circumstances where the actual start and end meter readings are not reasonable available.</p>
Mr Craig Whybrow, p. 1.	With the increased take-up of solar panels and batteries, customers want to see meter readings on the electricity bill to verify their return on investment.	<p>The Commission is of the view that the current rules provide an adequate framework to assist consumers to understand and check their bill and already require retailers to display the information, charges and savings, for energy customers, including customers with solar panels or batteries.</p> <p>Additionally, the market already offers various tools for customers to verify their energy consumption, charges or return on investment (for example, for customers with solar panels or batteries), that are more effective than the proposed rule change.</p>

B LEGAL REQUIREMENTS UNDER THE NERL

This appendix sets out the relevant legal requirements under the NERL for the AEMC to make this final rule determination.

B.1 Final rule determination

In accordance with s. 259 of the NERL the Commission has made this final rule determination in relation to the rule proposed by Mr Craig Whybrow.

The Commission has determined not to make a final rule.

The Commission's reasons for making this final rule determination are set out in chapter 2.

B.2 Power to make the rule

Section 2.2 describes the limitations on the Commission's power to make a rule in respect of the rule change request.

B.3 Commission's considerations

In assessing the rule change request the Commission considered:

- its powers under the NERL to make the rule
- the rule change request
- submissions received during first round consultation
- the Commission's analysis as to the ways in which the proposed rule will or is likely to, contribute to the NERO.

There is no relevant Ministerial Council on Energy (MCE) statement of policy principles for this rule change request.¹⁰²

¹⁰² Under s. 225 of the NERL the AEMC must have regard to any relevant MCE statement of policy principles in making a rule. The MCE is referenced in the AEMC's governing legislation and is a legally enduring body comprising the Federal, State and Territory Ministers responsible for energy. On 1 July 2011, the MCE was amalgamated with the Ministerial Council on Mineral and Petroleum Resources. The amalgamated council is now called the COAG Energy Council.