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Ref: JD/TF/AC

25 January 2016

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

Dear Mr Pierce

Consultation Paper - National Retail Amendment (Meter Read and Billing Frequency) Rule 2016 (RRC0006)

Ergon Energy Corporation Limited (Ergon Energy) welcomes the opportunity to provide comment to the Australian Energy Market Commission (AEMC) on its *Consultation Paper - National Energy Retail Amendment (Meter Read and Billing Frequency) Rule 2016* (the Rule Change). This submission, which is available for publication, is made by Ergon Energy in its capacity as an electricity Distribution Network Service Provider in Queensland.

Ergon Energy is supportive of the rule change proposed by Ergon Energy Queensland (EEQ). In principle, we support the proposal by EEQ to amend rule 24(1) and rule 21(1)(c).

We note that the AEMC proposed an alternative solution in the Consultation Paper such that, the Australian Energy Market Operator, amends its Service Level Procedure to require Metering Data Providers (MDPs) to read meters more frequently so that bills are likely to be issued on the basis of actual consumption at least once every three months. Ergon Energy does not support this proposal. Ergon Energy is an accredited MDP. As the MDP is responsible for metering data services, there will be a significant increase to costs if there was a proposal to increase the number of times meters are read. We anticipate that costs would increase in the following areas:

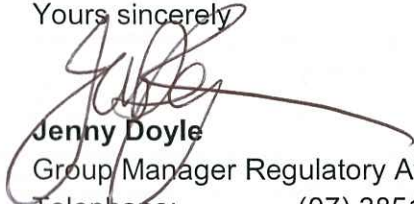
- meter readers;
- Overhead support staff to complete reading schedules, audit readers;
- Meter reading hand held devices; and
- Software licenses.

Ergon Energy also considers that, increasing meter readings by the MDP may still result in estimated meter reads if customers are billed quarterly.

Furthermore, Ergon Energy shares the concerns expressed by the Energy Networks Association in its submission, regarding any proposal that seeks to interfere with the current circumstances that constrain the ability to offer estimated reads. Specifically, notwithstanding the proposed changes to the regulatory framework, estimated reads will remain necessary where there are access issues, such as locked gates or dogs.

Should you require additional information, or wish to discuss any aspect of this submission, please do not hesitate to contact either myself on (07) 3851 6416 or Trudy Fraser on (07) 3851 6787.

Yours sincerely



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