

22 April 2016

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235



positive energy

Dear Mr Pierce

Consultation Paper: Meter Read and Billing Frequency (RRC0006)

Energex Limited (Energex) appreciates the opportunity to provide a submission to the Australian Energy Market Commission (AEMC) on its draft determination in response to a rule change request received from Ergon Energy Queensland (Ergon) in relation to meter read and billing frequency.

Ergon's rule change request proposed an amendment to the National Energy Retail Rules (NERR) to enable retailers to delay issuing a bill to a small customer on a standing offer until a meter read is provided by the Metering Data Provider. In its draft rule determination the AEMC has recommended a more preferable draft rule that differs from the rule proposed by Ergon. The more preferable rule requires retailers to issue a bill to small customers at least once every 100 days, replacing the existing requirement for retailers to issue a bill at least once every three months.

Energex supports the AEMC's draft rule as an appropriate solution to the compliance issue raised by Ergon and agrees with the AEMC's assessment that it will contribute to the achievement of the National Energy Retail Objective. The proposed amendment to the NERR will not only provide retailers with a broader timeframe within which to issue bills to small customers but will allow more small customers to receive bills based on actual consumption, thereby increasing the accuracy of bills while minimising impacts on billing frequency and maintaining important consumer protections.

Energex also welcomes the AEMC's conclusion that it would not be a proportionate response to the issue identified by Ergon to impose additional obligations on Metering Data Providers with respect to meter reading frequency on the basis that the costs to perform more frequent meter reads would be borne by all customers.

Should you have any queries regarding this submission, please contact Charmain Martin, on (07) 3664 4105.

Yours sincerely

Rachel Leaver
Acting Group Manager Regulation and Pricing

Enquiries

Charmain Martin

Telephone

(07) 3664 4105

Facsimile

(07) 3664 9818

Email

charmainmartin

@energex.com.au

Corporate Office

26 Reddacliff Street

Newstead Qld 4006

GPO Box 1461

Brisbane Qld 4001

Telephone (07) 3664 4000

Facsimile (07) 3025 8301

www.energex.com.au

Energex Limited

ABN 40 078 849 055