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26 July 2018

Mr Ed Chan  
Director  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Submitted electronically

Dear Mr Chan,

**Re: Metering installation timeframes - ERC0236**

Red Energy (Red) and Lumo Energy (Lumo) welcome the opportunity to respond to the Australian Energy Market Commission's (the Commission) Consultation Paper on rule change proposals by The Honourable Josh Frydenberg MP, Minister for the Environment and Energy, and the Australian Energy Council (AEC) relating to metering installation timeframes.

Competitive metering remains in its relatively early stages following the commencement of new rules in December 2017. Retailers, metering coordinators and other parties continue to learn from their experiences and improve customer outcomes. As a result of our experience some minor areas for improvement in the current National Energy Retail Rules (the Retail Rules) have become apparent. A particular example is a retailer's inability to deliver to customer needs on the basis of an inflexible planned interruption notice.

Therefore, we welcome the chance to respond to the recent rule change proposals and to offer our view on how the Retail Rules can be amended to deliver better customer outcomes. We consider that there are opportunities to improve market outcomes by granting retailers and their customers greater flexibility to agree to mutually beneficial terms. Competitive metering creates a more customer focused environment so regulation should accommodate practical considerations, unforeseen events and customers' specific circumstances (e.g. life support customers who may require a more tailored solution). Retailers are incentivised to provide a positive customer experience, in every aspect of the metering installation process, from timeliness, punctuality, commissioning of the meter and ongoing maintenance. In order to achieve this, we encourage the Commission to continue to allow flexibility in the regulatory instruments.

**About Red and Lumo**

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

Red and Lumo thank the Commission for the opportunity to respond to the Consultation Paper. Should you have any further enquiries regarding this submission, please call Geoff Hargreaves, Regulatory Manager on 0438 671 750.

Yours sincerely

**Ramy Soussou**  
General Manager Regulatory Affairs & Stakeholder Relations  
**Red Energy Pty Ltd**  
**Lumo Energy (Australia) Pty Ltd**