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Ms Jess Boddington
Project Leader
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

14 September 2018

Dear Ms Boddington

Submission to the Australian Energy Market Commission (AEMC):
Estimated Meter Reads

The Energy and Water Ombudsman (SA) Limited (“EWOSA”) welcomes the opportunity to comment on the Australian Energy Market Commission’s Draft Rule Determination on the *Estimated Meter Reads* rule change requests.

EWOSA is an independent Energy and Water Ombudsman Scheme in South Australia. It receives, investigates and facilitates the resolution of complaints by customers with regard to (*inter alia*) the connection, supply or sale of electricity, gas or water.

We generally support the draft rule to allow energy customers to request an adjustment to an electricity or gas bill, that is based on an inaccurate estimated meter read, by providing the retailer with a customer self-read of the meter. This is likely to reduce the negative impacts of bill shock and make it easier for energy consumers, particularly vulnerable and other low-income consumers, to manage their energy bills and consumption. EWOSA would expect to receive fewer complaints regarding estimated bills as a result.

We believe it is appropriate for the new rule to apply to all types of electricity and gas metering arrangements and for retailers to be required to provide guidance to small customers on how to read their meter. We agree that when an estimated bill is provided, that retailers are required to inform small customers of their right to request an adjusted bill and the processes to follow in providing a self-read of their meter. The limited grounds provided for in the draft rule upon which a retailer would be able to reject a customer self-read are appropriate.

We also support the requirement on customers that they must request an adjustment to their bill and lodge their self-read with the retailer before the due date for payment of the original bill.

However, while retailers are required to advise customers of any changes to their payment obligations, there does not appear to be any timeframe on payment after the bill has been adjusted. Energy customers need to be provided with enough time between the issuing of their adjusted bill and when the payment of that adjusted bill is required. We would suggest a minimum of five business days. Any such timeframe should be made explicit in the final rule.

It is also important to note that there are not any requirements on retailers regarding honouring pay-on-time discounts. We believe that if a customer requests an adjustment to their bill based on a customer self-read in accordance with the rule change, any pay-on-time discount specified in their contract should be honoured if the payment is made within the timeframe mentioned in the previous paragraph. This should also be made explicit in the final rule.

We support the additional measures in the draft rule to strengthen customer protections:

- Enhancing dispute resolution provisions – in particular, that “the retailer must also set out a process under its standard complaints and dispute resolution procedures for a small customer to attempt to rectify a reading of their meter that is not accepted by the retailer. Following this, the retailer must inform the small customer that the customer may lodge a dispute with the energy ombudsman where the customer is not satisfied with the retailer’s reason(s) for not accepting the customer read estimate.” (Page 27 of the Draft Rule Determination)
- Requiring customers to pay for the cost of a meter test or data check only after the test or check has been completed and only if the meter or data proves not to be faulty or incorrect
- Recommending that civil penalties apply to certain provisions of rule 21 to protect customers from inaccurate estimated meter reads.

Should you require further information or have any enquiries in relation to this submission, please email me at antony.clarke@ewosa.com.au or telephone me on (08) 8216 1851.

Yours faithfully



Antony Clarke
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