

Our Ref: EWOQ/18/
Your Ref: ERC0236

25 October 2018

Attention: Ms Jess Boddington
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235
www.aemc.gov.au

Dear Ms Boddington

Re: Draft Rule Determination – Meter Installation Timeframes (ERC0236)

We thank you for the opportunity to make a submission on the Draft Rule Determination on the *National Electricity Amendment (Metering Installation Timeframes) Rule 2018* and the *National Energy Retail Amendment (Metering Installation Timeframes) Rule 2018*.

Background to EWOQ

The Energy and Water Ombudsman Queensland (EWOQ) provides a free, fair and independent dispute resolution service for small electricity and gas customers across Queensland and water customers in south-east Queensland who are unable to resolve a dispute with their supplier. Our submission is based on our experience as an external dispute resolution scheme dealing with residential and small business energy customer complaints in Queensland.

Assessment Framework

We understand the rule change seeks to improve the protection of customers by imposing new requirements on retailers to install a new or replacement meter within maximum timeframes. The Australian Energy Market Commission (AEMC) has to determine whether the proposed rule would likely contribute to the National Electricity Objective (NEO), the National Energy Retail Obligation (NERO) and satisfy the consumer protections test. With this in mind, we support the AEMC's choice of assessment framework which evaluates the rule change against the criteria of efficient use of energy, consumer protection, efficient provision of electricity services, and regulatory and administrative burden and concurs with the summary of reasons outlined in the draft rule determination.

Feedback on the Draft Rule Determination

EWOQ supports the intention of the draft rule determination and welcomes a change which provides consumers with greater control and confidence over when their electricity meter will be installed and offers a range of additional measures to reduce meter installation delays.

As an industry ombudsman scheme, we have received a significant increase in complaints in relation to the provision of metering services, particularly since the beginning of 2018. This is evidence of the severe impact metering delays can have on residential and small business customers either through imposing a financial hardship, leaving customers without electricity supply or making it difficult to access new electricity products and services. Accordingly, we are supportive of introducing a regulated timeframe for metering installation and endorse the draft rule change which will impose a nationally consistent and firm set of installation timeframes into the National Electricity Rules (NER).

We understand the requirements will differ slightly depending on whether the meter installation is for a new connection, a simple meter exchange or a complex meter exchange and this is due to the installation steps being different for each scenario and the number of parties involved and are supportive of this approach. We further welcome the flexibility of the draft rule which allows retailers and customers to work together to agree on an appropriately suitable time for a meter installation, as well as the requirement on retailers to meet a maximum timeframe for the provision of a meter installation. We agree with the Commission's analysis that "these requirements constitute a clearer, more consistent and firm set of expectations for retailers to deliver metering services to customers in the National Electricity Market".

EWOQ further welcomes the measures to strengthen the existing consumer protections. In particular, we endorse the provisions which place an obligation on retailers to inform customers of metering installation timeframes, as well as publish information on their website about the following new requirements:

- Maximum timeframes for retailers to provide a meter installation where the installation has been requested by a small customer;
- If the customer agrees with the retailer to an alternate date for the meter to be installed, the installation timeframe is as agreed; and
- Timeframes will not apply in certain circumstances for example, electrical or other safety constraints.

In our experience, customers identified information provision as a key area that would assist their engagement with their energy retailer and improve consumer confidence.

We also agree:

- The timeframes should apply equally to residential and small business customer within urban areas to those in rural or regional areas. It is important for these customers to face equal protections under the energy rules;
- The changes to the notification requirements for retailer planned interruptions allow for more flexibility while retaining the current consumer protections under the National Energy Retail Rules (NERR), including the requirement for retailers to notify customers of a retailer planned interruption, the provision of a 24-hour telephone number for enquiries and the additional protections for life support customers; and
- Civil penalty provisions should apply to promote compliance with the new requirements and act as a deterrent against metering installation delays.

It is noted the draft rule determination provides for the proposed commencement dates:

- 1 January 2019 for changes to Chapter 7 of NER and the new clause 56C of the NERR; and
- 6 December 2018 for the provisions for retailer planned interruption notifications.



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Given the importance of addressing the ongoing problems of metering installation delays, EWOQ endorses these timeframes.

Overall, EWOQ agrees with the Commission's view that "the draft requirements on retailers to install a meter within a maximum timeframe strikes an appropriate balance between enhancing customer protections and maintaining the benefits of the metering contestability reforms".

Thank you for the opportunity to contribute to this draft rule determination. If you require any further information regarding this matter, please contact me on (07) 3087 9452.

Yours sincerely,

Jane Pines
Energy and Water Ombudsman

