



1 November 2018

Ms Anne Pearson
Chief Executive
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Anne

AEMC Reference ERC0246 – Meter installation – advanced meter communications

Thank you for the opportunity to comment on the “*AEMC consultation paper National Electricity Amendment (Meter installation – advanced meter communications) Rule 2018*”.

The Energy & Water Ombudsman NSW (EWON) investigates and resolves complaints from customers of electricity, gas and some water providers in NSW. Our comments are informed by our investigations into these complaints, and from our community outreach and stakeholder engagement activities.

EWON receives complaints from customers who have Type 4 meters, and want the remote communications facility removed. The attached case study, and other similar complaints, shows retailers can be reluctant to do this. The AEMC’s proposal to allow existing Type 4 meters to be converted to Type 4A, where that solution is the least cost, would seem a sensible one. EWON therefore supports the proposal.

However, customers who object to their meters having remote communications may then face additional costs. EWON strongly recommends that when a customer requests an existing Type 4 meter be converted to, or replaced by, a Type 4A, that the retailer be required to inform the customer of any costs associated with the conversion or replacement, as well as the ongoing cost of manually reading the meter. Only then can the customer make an informed decision.

If you would like to discuss this matter further, please contact Rory Campbell, Manager Policy & Research, on (02) 8218 5266.

Yours sincerely

A handwritten signature in blue ink that reads "Janine Young".

Janine Young
Ombudsman
Energy & Water Ombudsman NSW

Attachment 1

Case study

A customer advised that his retailer sent a notification advising that his meter was faulty and would be replaced. His retailer installed the new meter, however the customer then realised it was a smart meter and called his retailer multiple times to request the communications device be disabled. He also considered the antenna installed in his meter box to be excessively large. The retailer advised that it was not obliged to disable the meter's communications and did not explain the reason for the size of the antenna.

This matter was referred to the retailer at a higher level.

The customer subsequently returned to EWON as he does not accept the advice that they do not have the ability to turn off remote communications.

This matter is currently being investigated.