

## Timing Limitations for Meter Installations

Enova are an electricity retailer. Enova do not own metering assets or install metering assets, or have control of the time at which a metering asset will be installed.

It is unreasonable for us as a retailer to be fined for any lack of expected performance by a third party.

The time limits that are being proposed are consistent with the current rules for time limits to install meters subject to Meter Fault Notifications, these are not currently being met by the market. Please contact us to discuss timing of our ability to respond to customer requests and typical times until meter exchanges are scheduled with third party Meter Providers.

## Providing Greater Metering Choice

“Power of Choice” has removed the customers choice to have an economically priced meter provided and maintained by the network operator.

Private Meter Providers and MDP have increased metering costs from those typical of Essential Energy metering. Customers outside of mobile telephone reception have disproportionately high metering costs associated with manual reads from multiple metering companies that do not have the efficiency of scale offered by the network operator. Continuing to allow for networks to provide basic metering in these situations would provide the best range of metering choices for those customers.

With ASP L2 installed solar net meters, solar installations could be operational when the ASP installs the solar PV, without the Retailer having to be involved and forcing their own preference of metering, costs and install timeframe upon the customer.

## Faster Solar Net Meter installations under the Power of Choice Rules

Customers want their solar PV to be operational as soon as their PV is on the roof. Currently the rules force that the PV install, then the meter order and the meter install all happen in sequence. Enova would like to highlight opportunities to reduce the time taken to install solar net meters, by changes to regulation. The market rule that prohibits B registers from being established before PV is installed. Stalling the meter exchange service order until a CCEW is received on behalf of the customer. If meter providers could establish a B register prior, retailer could order solar net meters as soon as the customer wants to begin their path to getting solar PV, the meter order can be placed and underway parallel to the solar being ordered and in many cases, be installed before the solar PV is installed. The retailer could receive zero values in the B register until the PV is there to create export.

## Customer Reads

As a small retailer, we will be sensitive to being obliged to accept customer self reads for the following reasons:

Our demographic is in a tourist area and has a very high turnover of customers within premises, fraudulent self reads will leave us liable for unreported usage when customers leave the premises (and often leave the country) without final reads entering the market.

Limitations on Cash flow for billing reconciliations that may be up to a year between actual market reads.