

Brian Connolly



22 October 2018

The Australian Energy Market Commission
PO Box A2449
Sydney South NSW, 1235

Dear Sir

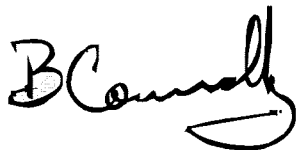
**RE: Submission on Metering Installation Timeframes
Project - ERC0236**

1. I am a self-funded retiree directly affected by an Energy Retailer in regard to meter installation timeframes
2. In my case, during August, I had a rooftop Solar System installed on a 20 year old existing dwelling and required a meter change to fully utilise the system
3. It has now been more than 70 days since application was made to my retailer for a replacement meter.
4. To date the meter has not been replaced and no current replacement date has been advised. My retailer is well aware of my concerns.
5. I have read the proposed timeframes contained in the draft rule amendments and believe they are both reasonable and generally achievable.
6. My concern relates to the behaviour displayed by the major retailers and the rule enforcement provisions which will be in place.
7. The draft rules and expected timeframes have been well publicized for at least 6 months. The rules are clearly to benefit the customer but not at the detriment of the retailer. One would reasonably expect that every major industry retailer would be well advanced in adopting practices to meet the proposed rules.
8. Failure to meet the nominated timeframes results in a loss to the customer of revenue associated with exports from the customer to the network. It is not known if the retailers are selling such power but the retailer benefits in that the customer pays more for power than would otherwise be the case.
9. I believe stronger enforcement provisions are required for non-compliance. It is apparent that reputational damage is of passing concern and possible fines for non-compliance are treated as a business expense. Neither will change corporate behaviour.
10. I would recommend that penalties should extend to loss of licence to operate as an energy retailer for demonstrated gross misconduct. I would also recommend that penalties should include disqualification of all directors from

holding any position with any company operating in the energy business in Australia.

11. From the reported experiences of the current Banking Royal Commission and its observations on regulatory oversight, I would also advise no hesitation in application of such punitive measures.
12. I note that the Civil Penalty Regime under the National Energy Laws is a matter under consideration by the COAG Energy Council and as such is going nowhere.
13. Based on my investigations, all major retailers are in a similar position; otherwise there would be no current consideration for the proposed rule changes.
14. The measures I have proposed may seem draconian and would require transitional arrangements to maintain services to customers of an effected retailer. In my view this could be best affected by appointment of an interim administrator.
15. Thank you for the opportunity to make a submission on the matter.
16. Attached for background purposes is a copy of my correspondence to my Energy Retailer.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'B Connolly', with a stylized flourish at the end.

Brian Connolly