

7 February 2019



Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2499
Sydney South NSW 1235

Dear Mr Pierce

National Electricity Amendment (Meter Installation - Advanced Meter Communications) Rule 2019 Draft Rule Determination

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Commission (AEMC) regarding its National Electricity Amendment (Meter installation – advanced meter communications) Rule 2018 Draft Rule Determination.

This submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers (DNSPs), Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy Network);
- A regional service delivery retailer, Ergon Energy Queensland Limited (Ergon Energy Retail); and
- Affiliated contestable business, Yurika Pty Ltd (Yurika) which includes the Metering Dynamics business.

Energy Queensland largely supports the Draft Rule Determination as made by the AEMC.

However, Energy Queensland questions why the metering coordinator rather than retailer (who has the direct relationship with the customer), is responsible for informing the small customer, or ensuring the financially responsible market participant has informed the customer:

- about the differences between a type 4 metering installation and a type 4A metering installation; and
- the upfront costs and indicative ongoing expenses associated with a type 4A metering installation that will be payable by the small customer.

Energy Queensland also seeks clarity around how a Type 4A meter may be achieved, and we suggest that a decision to remotely deactivate or reactivate the communications function (rather than the physical removal of the communications device from the meter) be at the discretion of the metering coordinator.

Furthermore, Energy Queensland strongly supports the intent that costs associated with converting a Type 4 meter to a Type 4A meter be met by the customer, including the costs to reactivate the communications function and return the meter to a Type 4 meter.

Finally, Energy Queensland acknowledges that an increase in penetration of Type 4A meters has the potential to impact load management services where load management makes use of the communications function provided by the meter. Energy Queensland therefore suggests that a customer's preference for a Type 4A meter must be balanced against the benefits a Type 4 meter can deliver to the customer and the market more generally.

Should you require additional information or wish to discuss any aspect of Energy Queensland's submission, please do not hesitate to contact either myself on (07) 3851 6787 or Andrea Wold on (07) 3664 4970.

Yours Sincerely



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