



08 January 2019

Mr James Hyatt
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Mr Hyatt,

National Electricity Amendment (Meter Installation – advanced meter communications) Rule (ERC0246)

The intelliHUB Group welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) consultation paper on the National Electricity Amendment (Meter Installation – advanced meter communication Rule 2018 (ERC0246).

intelliHUB Group support the rule change as proposed by the Australian Energy Council as we believe that customers should be empowered to take control of their energy use and to access the benefits of their smart meter.

Customer Choice

The current drafting of clause 7.8.4 of the National Electricity Rules is intended to provide choice to customers, however, by virtue of the drafting, it has only contemplated customer choice at the point of installation.

Amending the rule to enable or disable remote communications without the need to replace a fully functioning meter will lead to efficient outcomes. This will help to ensure that customers remain in control and should concerns regarding remote communications arise, have suitable options available to them. We believe that this flexibility will increase the likelihood of a customer uptake of smart meters and an increase of those that are remotely communicating in the long term.

External Factors

Further to the above draft rule change, intelliHUB would like the AEMC to additionally consider situations where the meter was communicating and then for several reasons is no longer, which can include:

- Customer builds a structure in front of the meter that blocks the signal
- Surrounding building development of the area no longer allows for signal penetration

In these instances, it is not currently allowed under the rules to convert a communicating meter – Type 4 back to a Type 4A. It is only allowed upon initial installation via an exemption request to the Australian Energy Market Operator – AEMO. There is no consideration should the telecommunications connectivity change after the initial install. The intelliHUB Group proposes that this instance is allowed in conjunction with consultation with the retailer going forward and would like the AEMC to see this as consideration as part of this draft rule change.

The intelliHUB Group would welcome any further discussion in relation to this submission. If you have any questions or wish for further discussion, please contact Robert Lo Giudice on 0419 539 638 or at robert.logiudice@intelliHUB.com.au.

Sincerely,

Peter Birk

Group Chief Operating Officer - intelliHUB Group