



**EnergyAustralia**

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Australian Energy Market Commission  
Independent Competition and Regulatory Commission  
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Lodged electronically: <https://www.aemc.gov.au/contact-us/lodge-submission>

Dear AEMC

EnergyAustralia welcomes the opportunity to make this submission for the consultation paper on the AEMC review of bill contents – customers with interval meters. EnergyAustralia is one of Australia's largest energy companies with around 2.6 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and approximately 12,000 customers in the Australian Capital Territory. We also own, operate and contract an energy generation portfolio across Australia, including coal, gas, battery storage, demand response, wind and solar assets, with control of over 4,500MW of generation in the National Electricity Market (NEM).

Please refer to the stakeholder feedback template provided with this response.

If you would like to discuss this submission, please contact Travis Worsteling on +61 3 8628 1704 or [travis.worsteling@energyaustralia.com.au](mailto:travis.worsteling@energyaustralia.com.au).

Yours sincerely

**Sarah Ogilvie**  
Industry Regulation Leader

## ATTACHMENT 1

### STAKEHOLDER FEEDBACK TEMPLATE

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in this paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

#### SUBMITTER DETAILS

**ORGANISATION:** EnergyAustralia

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#### CHAPTER 4 – ASSESSMENT FRAMEWORK

1. Is the proposed assessment framework appropriate for considering the rule change request?	We agree that the proposed framework is appropriate.
2. Are there other relevant considerations that should be included in the assessment framework?	

#### CHAPTER 5 – SECTION 1 - ISSUES

3. To what extent is it an issue that a retailer is not required to provide to a small customer with an interval meter the start and end meter reading in the bill?	It doesn't provide the information some customers expect (information they would have received from their previous meters), it therefore limits the ability to confirm consumption by comparing the bill with the reading on the meter. EnergyAustralia has received no internal or ombudsman level complaints relating to this since 1 December 2017, it therefore suggests that this is a low-level issue.
a. Is it any different for customers with advanced interval meters?	The issue is solely about customers (outside of Victoria) with advanced interval meters, as they don't receive the start and end read on their bills. Customers with advanced interval meters, who are engaged in the market, can access their consumption information. For example, downloading daily usage from online portals or access to apps.
4. With more advanced interval meters to be roll out and more digital near real-time solutions/tools available to	Common sense will say that this will become a more prevalent issue, solely because of the increase in advanced interval meters. The increase in prevalence might be only a few additional complaints about the issue, therefore it is unclear

<p>customers, is it likely that this issue becomes more or less prevalent over time?</p>	<p>whether the increase warrants a change to the billing of all customers is warranted.</p> <p>The cost benefit analysis should be considered, although the change appears minimal there will be a financial increase due to retailers adopting a start and end read. This should be compared against complaints for not having a start and end read, and churn of customers for this reason.</p> <p>It is worth noting that distributors do not currently provide the start and end read, retailers have invested heavily in systems to allow the Vic requirements. We will have a better ability to request the start and end read of contestable meter data providers; however, the additional cost may still be significant.</p>
<p>5. What are the tools offered to customers with advanced interval meters to understand their bill and energy consumption?</p>	<p>There are significantly more tools available to customers with advanced interval meters than those with 'dumb' or 'basic' meters. Customers are provided with access to real-time data from their retailer and commonly their distributors offer this service as well.</p> <p>There are more and more applications and products being developed to assist customers in understanding their consumption, and the majority are reliant on the data provided by advanced interval meters.</p> <p>EnergyAustralia has created a mobile app 'my account' that allows customers to download daily, monthly, or annual usage data and includes a breakdown of different streams; consumption or generation.</p> <p>This enables customers to accurately identify when and extrapolate how they are using their energy, and generally will provide insight in how to reduce consumption.</p>
<p>6. What are the tools offered to customers with interval meters (type 5)?</p>	<p>Customers are provided information on how to read their meters and have access to the same tools as customers with advanced interval meters; however, the accuracy of the data is dependent on whether actual data has been received (probing the meter) or if it has been estimated.</p> <p>Once a customer's meter data is obtained it will be uploaded and available for their review; however, the update of the data takes time, i.e. you may wait three months to have your data updated. This presents issues when customers are trying to change their usage patterns and are then unable to recall how they were using energy.</p>
<p>7. How many complaints do stakeholders receive related to the issue raised in this rule change request?</p>	<p>EnergyAustralia has received 8 internal and ombudsman level complaints relating to specifically this issue since 1 December 2017, this indicates that it is a low-level issue.</p>

## CHAPTER 5 – SECTION 2 – OTHER ISSUES

<p>8. What tools are available to customers with advanced interval meters to understand their use, reading and installation?</p>	<p>There are basic instructions on accessing the information from the meter directly, this is provided by retailers, ombudsman schemes, distributors, and consumer groups.</p> <p>The required skill level to read an advanced interval meter is higher than that of a dumb/basic meter.</p> <p>Many meters are readily accessible, but we have had recent incidents where customers have gone to look inside their</p>
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	meter boxes, or behind the meter board and sent us photos showing dangerous wiring. Due to safety concerns for the customer, EnergyAustralia’s policy is not to request or recommend customers to access their meter. We leave it open to customers to access their meter if they are comfortable to do so, but we are careful not to normalise or suggest this in a way that might encourage them to take unsafe actions.
9. Do you consider that the information available for customers is adequate to understand advanced interval meter use, reading and installation?	The information available is suitable for the majority of customers; however, we are always striving to make improvements in the presentation of information, with the aim of providing a suitable explanation to our customer’s varying levels of understanding.
10. What additional information should be publicly available for customers to understand advanced interval meter use, reading and installation?	<p>It is not likely to be a case of additional information, as there is a significant amount of information available to customers. The gap is the customers access to this, whether this is due to the location of the information not being publicised or customers not being interested is unclear.</p> <p>A single point of reference might be a better way of providing accurate information to customers, all places that currently provide information could then reference the new site. The site could focus on providing the information in a clear and easily understood format. The possibility of radio/TV advertising should be considered.</p> <p>The estimated meter read rule change provided new obligations to provide information to enable customers to better understand their meters etc. as this rule change was only completed in February we consider that this issue has been considered by the AEMC.</p>

## CHAPTER 5 – SECTION 3 – SOLUTIONS

11. What are the costs and benefits of eliminating the transitional rule?	<p>The costs of eliminating the transitional rule are hard to determine; how will retailers be provided with the start and end read? Will we need to renegotiate contracts with MDPs to ensure this information is provided, what costs would be associated with this change.</p> <p>If there was no cost from the MDP, are our billing systems robust enough to handle the additional information? If not, how long would it take to implement – considering there are numerous regulated changes occurring – and at what cost.</p> <p>As highlighted in the consultation paper, the start and end read add little benefit to customers that are on a block, Time of Use, or demand tariff. With a greater push for cost reflective tariffs, it is understandable that there will be a reduction in the single rate tariffs and corresponding reduction in the need for start and end reads.</p>
12. What are the costs and benefits of adopting the Victorian solution?	The cost to implement the change is dependent on our agreements with the distributors and Meter Data Providers that supply meter readings. The consultation paper refers to EWOV complaints relating to the advanced meter roll out, it is unclear how this information would assist the responses to this paper as there was no numbers provided for complaints relating to start and end reads and how they changed after

	<p>the retailers implemented the ESC requirement from 1 July 2012.</p> <p>We believe that of the options available the removal of the transitional rule is preferable to adopting the Victorian solution, as removal of the transitional rule still requires the start and end read to be provided; however, gives some flexibility in how the retailers will present this, which the overly prescriptive Victorian solution does not.</p>
13. What are the reasons for retailers to exclude cumulative readings in the bills for other NEM jurisdictions when this information is disclosed in the bills in Victoria?	<p>The main reasons would be whether it is necessary for this information to be provided when there are better alternatives for consumption data to be provided to customers, and the reality that there are only a small portion of customers that require this information.</p> <p>It is also something that a competitive market should address. If there is a need for customer's to have the start and end read on their bills, then some retailers will offer it, this will lead to customer churn and the likelihood of other retailers considering it to retain their customers.</p>
14. Are there any alternative solutions to consider that may have greater benefits and/or lower costs?	<p>A lower cost alternative would be if retailers establish a way of advising customers their start and end read – or more detailed consumption data – without making changes to all bills.</p> <p>This might look like providing a customer's consumption data to them directly, if they have raised a concern with not being able to verify their usage. The format of the data would change based on the customer's capabilities and/or requirements.</p> <p>This option would only be suitable depending on the scope of the problem, i.e. larger retailers can struggle with manual workarounds due to the size of their customer base.</p> <p>There is a risk that overengineering the regulations, would impose real costs and complexity onto customers (directly and indirectly) when the current obligations would work.</p> <p>We request the Commission further consider the necessity of future proofing the regulations to allow retailers the ability to design new products that reflect what customers want.</p>
15. To what extent, if any, will the Consumer Data Right reform address the issues raised in the rule change request?	<p>The issues raised in the rule change request refer to customer's not being provided the start and end read on their bills, as was previously provided. The rule change request does not imply that access to the data (start and end read, or total consumption) was refused, therefore the Consumer Data Right reform will not address this; unless it specifically requires retailers put the start and end read on bills.</p> <p>Customers currently have access to their consumption data, they can receive this in excel format if they request it from the retailer. Most will use a retailer's or a distributor's website/app to review their consumption, it is unclear how they could be provided more access to their data.</p>