



31 May 2019

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Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

By electronic lodgement

RRC0026 - Draft rule determination: Bill contents – customers with interval meters

Alinta Energy welcomes this opportunity to respond to the Australian Energy Market Commission's (AEMC) draft determination on the bill contents – customers with interval meters rule under the National Energy Retail Rules (NERR)

Alinta Energy is an active investor in energy markets across Australia with an owned and contracted generation portfolio of nearly 3,000MW, including 1,700MW of gas-fired generation facilities and 1,070MW of thermal generation facilities, and in excess of 1.2 million electricity and gas customers including more than 600,000 in east coast markets, and is therefore well placed to provide comments on the draft determination.

Alinta Energy strongly supports the AEMC's view that the proposed rule that would change the contents of customer bills under the NERR is not in the long-term interests of consumers or contribute to the National Electricity Rules Objective.

As discussed by the AEMC in its draft determination and several stakeholders in response to the consultation paper on the proposed rule, the materiality of the problem it seeks to address is limited and has not increased in any significant way as the deployment of advanced interval meters has grown. The cost of upgrading billing systems to support the rule change proposal across all retailers is certain to outweigh the limited benefits that may accrue to end-use customers.

Developments in consumer-facing tools to facilitate the better understanding of their consumption data continues as retailers and other service providers seek to innovate and compete using the data advanced metering provides. Given the rapid evolution of energy related products and services in recent years (solar PV, electric vehicles and charging, home optimisation and battery deployment), Alinta Energy believes that competition amongst retailers and new entrant service providers is the best mechanism to deliver services (including the relationship between consumption data and customer billing) to customers.

Finally, there are a range of data and information sources available to customers to provide confidence in their billing data, including the long-standing ability to request metering data

used for billing free of charge with in specific timeframes and further access will be granted through the implementation of the Consumer Data Right.

We believe the proposed rule would lead to unintended consequences relating to customer confusion in around bill content. This is particularly so when it is likely that cost-reflective pricing will become more prevalent in the future and index reads bear no relationship to the profile upon which a customer is billed for their electricity, not just the imperfect relationship between billing data and local index displays that is a function of the technology and metrology in the market. That the Victorian requirement to provide start and end reads (which does not assist customers on flexible of time or use pricing), has not eliminated the (small) number of complaints specific to this issue is evidence that such a change is unlikely to improve consumer confidence in the retail electricity market.

Alinta Energy supports the AEMC's draft determination not to make the proposed rule given the limited benefits it may provide given its cost of implementation and that competitive market outcomes are more likely to deliver services and information that match customer preferences.

Should you have any questions or wish to discuss any aspect of our submission please contact David Calder on (03) 9675 5359 or via email: david.calder@alintaenergy.com.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Shaun Ruddy', written in a cursive style.

Shaun Ruddy
Manager National Retail Regulation