

Our ref: EWOQ/19/0207

Your ref: ERC0275

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Ms Alisa Toomey

AEMC

PO Box A2449

SYDNEY SOUTH NSW 1235

Dear Ms Toomey

### **Consultation on the Introduction of metering coordinator planned interruptions**

Thank you for the opportunity to make a submission on the proposal to introduce a rule change allowing for metering coordinator planned interruptions.

### **Background to the Energy and Water Ombudsman Queensland (EWOQ)**

EWOQ provides a free, fair and independent dispute resolution service for small electricity and gas customers across Queensland, and water customers in South East Queensland, who are unable to resolve a dispute with their supplier.

This submission is based on our experience as an external dispute resolution scheme dealing with residential and small business energy customer complaints in Queensland.

### **Question 1: Proposed NER Amendment**

#### **1.1 What are the benefits of allowing metering coordinators to arrange and carry out planned supply interruptions?**

Allowing metering coordinators to arrange planned interruptions is likely to alleviate challenges faced in circumstances where multiple customers are affected by outages.

It is anticipated that there would be benefits to the customer if metering coordinators could organise planned supply interruptions. Streamlining the process of arranging and undertaking planned outages would provide customers a single point of contact for enquiries about the outage, and the metering coordinator would act as a central liaison point for all interested parties. Through this streamlined process, there is also the potential to reduce costs and increase efficiencies. It is likely that efficiencies will be generated through the reduction of visits that a metering coordinator must make to attend a property where issues have arisen around consent or issuance of notices. A further potential benefit is that there might be a reduction in the number of failed meter installations and informed consent will be able to be given on site for smaller sites, such as duplexes.

#### **1.2 What is the magnitude of the issue that the rule change request is attempting to resolve? For example, how many meter installations are delayed due to inability to interrupt the supply of the retailer's customer without interrupting the supply of one or more other customers?**

Whilst we do not collect data on the number of customers impacted by meter installations delays of this nature, we have anecdotal information provided by retailers that meter failure and aged assets are the main reasons for meter failure notice.

**1.3 Under what circumstances would the rule be used? Do stakeholders consider that there would be any issues if the proposed rule is made with how the rule would interact with retailers, DNSPs and metering parties existing obligations in the NER or NERR?**

Consideration would need to be given to the interaction of a rule change with existing obligations in relation to privacy and use and disclosure of personal information. This would be particularly important for multitenancy premises, especially where there are different retailers and/or different metering coordinators.

The methods in obtaining consent for this purpose would also need to be considered and the use of that consent. This may require further changes to ensure that consent is obtained in the correct manner and used for the appropriate purpose. It is likely that planned interruptions will require informed consent by those customers affected. As such, sharing of personal information must be governed in an appropriate manner to ensure compliance with privacy obligations.

**QUESTION 2: REQUIREMENTS FOR METERING COORDINATOR PLANNED SUPPLY INTERRUPTIONS**

**2.1 Are retailer planned interruptions required if metering coordinator planned interruptions are introduced? Why or why not?**

Retailer planned interruptions would be unnecessary should metering coordinator planned interruptions be introduced. It is anticipated that the metering coordinator would be able to control this process as they would be acting in the same role and facilitating for the same tasks to be undertaken. Removing the retailer planned interruptions will allow for easier communication and fewer parties involved, which should increase the efficiency of the process.

**QUESTION 3: OTHER ISSUES**

**3.3. Should customers have any access to dispute resolution or another form of recourse if a metering coordinator breaches any of the rules in relation to metering coordinator planned interruptions?**

EWOQ fully supports customers having access to dispute resolution for metering coordinator breaches. This is an essential customer protection and customers should be able to report any breaches to an appropriate body and recourse should be available. The appropriate dispute resolution body should be specified in the rules to establish clear jurisdiction and to ensure clarity of process for customers.

If you require any further information regarding our submission, please contact Miss Jonnita Gillam, Principal Policy Officer on 07 3087 9404 or [jonnita.gillam@ewoq.com.au](mailto:jonnita.gillam@ewoq.com.au).

Yours sincerely

**Jane Pires**

Energy and Water Ombudsman