

28 May 2024

Julia Cassuben
Project Lead
Australian Energy Market Commission
REF: ERC0378

Dear Julia

National Electricity Amendment (Accelerating Smart Meter Deployment) Rule

Aurora Energy welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC) Draft National Electricity Amendment (Accelerating Smart Meter Deployment) Rule Change (Draft Rule). Aurora Energy is a customer-centric Tasmanian Government owned energy retailer providing energy services to the vast majority of Tasmania's electricity customers.

Aurora Energy is well progressed with its retailer led rollout, with over 200,000 customers having an advanced meter installed at their home or business, representing over 75 per cent of its customer base. Aurora Energy is on track to meet the Tasmanian Government target of a 100 per cent advanced meter roll-out by 2026 (in line with National Electricity Rules).

Aurora Energy understands the benefits to consumers of having an advanced meter installed and is broadly supportive of the Draft Rule, which is designed to "promote a fast, efficient, and effective deployment of smart meters under an improved metering framework in the National Electricity Rules (NER) and National Energy Retail Rules (NERR)."

Noting the roll-out in Tasmania is much further progressed than most other NEM jurisdictions and is likely to be close to complete by the second phase of the Rule Change (July 2025), Aurora Energy requests the AEMC consider exempting Tasmania from the requirement to establish a customer notification and industry record-keeping process, which would be triggered when a Metering Provider encounters a defect on a site visit.

Whilst acknowledging the benefit of this requirement, Aurora Energy currently tracks and manages those sites with defects internally. The establishment of a formal mechanism of customer contacts and responses in Tasmania will require an investment that will far exceed the customer benefit for a project that has a scheduled completion date of 2026.

Aurora Energy also seeks clarification on the timeline requirements for customers having an advanced meter installed. Rule 59A(3)(b) of the NERR states that a notice under subrule (2)(a) and (b) must state:

- (b)the expected date and time on which the retailer proposes to replace the customer's meter.

In section 3.4.1 of the Draft Rule, the AEMC outlines information that retailers must include in their notice to customers, including:

- An indicative timeline for when the customer would receive the smart meter (this can be a date range).

Aurora Energy supports the AEMC's view in relation to providing an indicative timeline in the form of a date range however, it appears as though the proposed amendments to the NERR do not include this change.

Aurora Energy also notes there are no proposed changes to Clause 7.8.4 of the NER, which allows customers the option to disable remote communication of smart meters. Aurora Energy maintains the view that this limits the ability for customers and the broader market to obtain the full benefit from advanced meters and will result in an ongoing meter reading cost that may be allocated to customers.

Should you have any questions regarding this submission, please contact Sam Unsworth on sam.unsworth@auroraenergy.com.au

Yours sincerely



Oliver Cousland
Company Secretary/General Counsel