



Government  
of South Australia

Department for  
Energy and Mining

DEM Ref: 2024D045166

Ms Anna Collyer  
Chair  
Australian Energy Market Commission  
PO Box A2449  
SYDNEY SOUTH NSW 1235

*Anna*  
Dear Ms Collyer

## **DRAFT RULE DETERMINATION - ACCELERATING SMART METER DEPLOYMENT**

The Department for Energy and Mining thanks the Australian Energy Market Commission (AEMC) for the opportunity to comment on its Draft rule determination - Accelerating smart meter deployment (draft rule determination).

The department is generally supportive of the AEMC's proposed approach. Our issues and concerns raised in the draft report have largely been addressed in the final report and the draft rule determination.

Noting our early comments regarding the importance of smart meters to consumers and the electricity sector in the transition of our electricity supply, the department supports regulatory intervention to accelerate the smart meter roll out where there are clear benefits to the consumer.

### **Opportunities to unlock further benefits for customers and participants**

The Department for Energy and Mining agrees with the AEMCs assessment that the current arrangements for accessing power quality data are inefficient and supports the draft determination to ensure DNSPs have access to basic power quality data.

### **Supporting customers through the transition**

While supportive of better information being provided to consumers, we query the draft determination's approach regarding notifying small customers about new meter deployments. We are not convinced on the rationale for the draft determination to propose reducing:



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- the number of notices a retailer must provide to a small customer from two notices to one notice.
- the minimum amount of notice from 15 days before the retailer proposes to replace the small customer's meter to 4 days before the retailer proposes to do this.

This is particularly as the AEMC states (page 71 of the AEMC's final report for the metering review) that feedback from stakeholders identified a lack of upfront information to customers as a key issue faced under the current framework. The Government of South Australia has received several ministerial letters from smart meter customers, raising issues with not having enough notice about their smart meter installations.

The department questions whether this reduction in notices and minimum amount of notice required would result in a customer having sufficient time to understand their rights and responsibilities regarding the installation (including regarding remediation); to assess potential upfront costs or changes to its retail contract arrangements including tariff changes (and potentially consider switching retailers if it is not happy with these new arrangements); as well as understand ways in which the new meter could benefit the customer.

On the other end of the timescale, it is possible that a customer may receive notice 60 business days (3 months) prior to the meter changeover and, if there is no reminder, have forgotten about this when the installation date arrives.

While the draft determination refers to the additional flexibility and planning the recommendation for one notice provides to retailers, it does not mention the counter argument which would be less flexibility and awareness provided to customers which is integral to the success of any accelerated rollout.

Additionally, there is a lack of consistency and clarity in the draft determination between notifying small customers about new meter deployments and notifying them about any variation in their tariff structure because of this deployment:

- Information that retailers must include in their notice to customers about new meter deployments, which must be provided between four and 60 business days before a proposed metering installation date, includes 'any changes to the consumer's retail contract resulting from the meter installation, including tariff changes.'
- Separately, notification about any variation in a small customers' tariff structure because of this new deployment must occur at least 30 days before the tariff change.

We seek to clarify whether the retailer is therefore required to provide two notifications about these tariff changes, or whether a retailer could just provide one notice via the new meter deployment notice, provided this occurred at least 30 days before the tariff change.



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This aside, the Department for Energy and Mining supports enhancements proposed to expand the information required to be provided to customers before a meter upgrade takes place. This should occur regardless of the meter deployment type.

The Government of South Australia thanks the AEMC for the work on this draft determination. Should you have any questions in relation to this submission, please contact Mr Justin Ward, Senior Policy Officer, Strategic Policy and Delivery Division, on (08) 8429 0707.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Vince Duffy".

Vince Duffy  
**DEPUTY CHIEF EXECUTIVE  
DEPARTMENT FOR ENERGY AND MINING**

28/15 / 2024

