



26 September 2024

Peter Thomas  
Australian Energy Market Commission  
Level 15, 60 Castlereagh Street  
Sydney NSW 2000  
Via [website](#)

Dear Peter

## **Accelerating Smart Meter Deployment Rule Change**

Thank you for the opportunity to provide a submission in response to the draft determination for the *Accelerating smart meter deployment* rule change following the announcement concerns raised by stakeholders.

Queensland Cane Growers Organisation Ltd (CANEGROWERS) is a not-for-profit public company with the sole purpose of promoting and protecting the interests of sugarcane growers since its inception in 1925.

CANEGROWERS is the peak body for the sugarcane industry. With 13 district offices in Queensland, our strong regional presence ensures that services and advocacy are provided in local communities as well as at the highest levels of industry and government decision-making.

CANEGROWERS has become aware of the rule change application for supporting the acceleration of smart meter deployment. We support the safeguard measures that have been proposed. We note however, that as part of the introduction to the accelerating smart meter deployment – Draft Rule Change document, it is stated that “the current ability of customer to opt-out of a metering installation change are proposed to be removed”.

CANEGROWERS strongly objects to the removal of the existing opt-out mechanism. The current approach ensures that if a meter is properly functioning then it remains the customer’s choice to retain the existing meter. Some irrigators that are represented by our organisation have chosen to opt-out under these circumstances for various reasons and we believe that this choice is an important right for customers.

The first example has very recently occurred where a grower who was advised that their existing meter would be upgraded to a smart meter as part of the roll out. They were advised that the supply and installation of the new meter would be \$16,000. The grower opted out of installation of a new meter because the unplanned expense could not currently be covered.

Another example has been where the meter change has led to compatibility issues with their irrigation pumping equipment that did not exist with the previous meter. To resolve this issue there have been cases where the growers have had to spend additional funds to make changes to their system to allow it to function with the new meter.

Given situational challenges such as these demonstrated, CANEGROWERS requests that the existing ability for customers to opt-out of a metering installation change is retained.



# CANEGROWERS

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Regards

Dan Galligan  
**Chief Executive Officer**