



21 December 2016

Ms Lily Mitchell
Australian Energy Market Commission
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Dear Ms Mitchell

Re: Draft Rule Determination: Using estimated reads for customer transfers (Ref ERC0196)

Ausgrid welcomes the opportunity to provide comments in response to the AEMC Draft Rule Determination on using estimated meter reads for customer transfers.

Ausgrid supports the AEMC's decision not to adopt the proposed Rule to use estimated meter reads when a small customer with a manually-read meter transfers to a new electricity retailer.

We agree with the AEMC that the costs to consumers of requiring an estimated meter read would be a significant and complex change to implement. In addition, we note that a number of developments since the AEMC's Review of Customer Switching have resulted in significant improvements to customer transfer times, with the roll out of advanced meters likely to have a further impact on reducing transfer timeframes.

Based on our observation of current advanced meter roll out numbers and our forecasts of aged and customer initiated replacements of Type 5 and 6 meters, we anticipate that by 2024 a significant number of consumers in our supply area will have an advanced meter. Consequently, Ausgrid supports the AEMC's assessment that the proposed Rule would have limited application (i.e. it would only apply to Types 5 and 6 metering installations) and would amount to an interim measure until advanced meters are rolled out. We concur with the AEMC that the proposed Rule change is unlikely to be in the long term interest of consumers and do not consider that it will promote the achievement of the National Electricity Objective.

If you have any queries or wish to discuss this matter in further detail please contact myself on (02) 92697210 or via email murray.chandler@ausgrid.com.au

Yours sincerely,

A handwritten signature in black ink, appearing to read "M Chandler", written in a cursive style.

Murray Chandler
Acting General Manager – Asset Management