



**EnergyAustralia**

22 December 2016

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Australian Energy Market Commission  
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Dear Commissioners,

### **AEMC 2016 – Using estimated reads for customer transfers – Draft Rule Determination**

EnergyAustralia welcomes the opportunity to comment on the National Energy Retail Amendment (Using estimated reads for customer transfers) Rule Draft Determination. We are one of Australia's largest energy companies, providing electricity and gas to over 2.5 million household and business customers in New South Wales, Victoria, Queensland, South Australia and the Australian Capital Territory. We also own and operate a multi-billion dollar portfolio of energy generation facilities across Australia, including coal, gas and wind assets with control of over 4,500MW of generation in the National Electricity Market.

EnergyAustralia support the Australian Energy Market Commissions' decision to not proceed with the rule change relating to the use of estimated reads for customer transfers. As stated in our submission to the Commission's discussion paper in June 2016, we do not believe that the benefits of the rule change are sufficient to outweigh the costs of implementation as the subset of customers eligible to benefit from this change will steadily decrease as remotely accessible meters are installed.

AEMO have lodged a submission advocating that the current framework will put customers without smart meters at a disadvantage. However, they only comment on market system and process capability for estimated reads do fail to recognise that more preferable options are currently available and are utilised by retailers and customers to facilitate a fast transfer. Special reads are preferred by customers instead of estimated reads as they are less complex and minimise risk of bill shock. Estimated reads are a key source of customer complaints to retailers.

In our view, the use of special reads is in the interests of all customers as:

- they provide a more cost effective solution by avoiding the costly system changes required to support estimated reads; and
- estimated reads are considered an inferior read type by both customers and retailers.

Should you require further information regarding this submission or request further information regarding the proposed rule changes, please call Georgina Snelling on 03 8628 1126.

Regards

**Melinda Green**

Industry Regulation Leader