

3 July 2015

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235



positive energy

Dear Mr Pierce

ERC0182: National Electricity Amendment (Meter Replacement Processes) Rule 2015

Energex welcomes the opportunity to comment on the AEMC's consultation paper on the proposed rule change by ERM Power to amend the National Electricity Rules (NER) to clarify the rights and obligations of certain parties involved when the meter is to be replaced. Energex is a member of the Energy Networks Association (ENA) and is supportive of the views and recommendations contained in the ENA's submission.

Energex is sympathetic to the concerns raised by ERM Power, however we do not believe that the proposed rule change will promote the efficient operation of electricity services but rather will introduce a level of complexity and uncertainty in the new prospective roles and responsibilities for meter replacement that is not in the long term interests of consumers. Rather, the intent and direction of the NER to delay meter exchange until retail transfer is completed, should be maintained.

Energex notes that the AEMC's consultation paper demonstrates a similar level of apprehension as to the merit of this rule change proposal. As such, Energex suggests that the AEMC reject the rule change request in order to provide the necessary focus and resources to finalise the metering contestability rule change but to also ensure that additional complexity is not introduced into the market prior to contestability.

It is more appropriate for the metering contestability rule change to consider the meter replacement process and how parties can access metering related data. Therefore, introducing additional complexity at this point in time is likely to further delay the delivery date for metering contestability.

Further, Energex is finalising system changes in order to comply with the requirements of the updated AEMO Meter Churn Data Management Procedures to be released by 1 September 2015. As such, the regulatory framework should provide sufficient certainty in undertaking necessary investments for market operation. It would be inefficient for this rule change to proceed in light of the significant system investments currently underway to meet upcoming regulatory changes.

Enquiries

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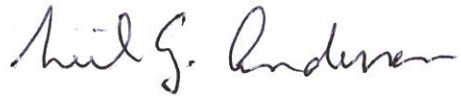
Reference ERC0183

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Energex looks forward to further engaging with the AEMC on this matter and if you require any information please do not hesitate to contact Ms Nicola Roscoe, Network Regulation Manager, on (07) 3664 5891.

Yours sincerely

A handwritten signature in black ink, appearing to read "Neil G. Andersen". The signature is written in a cursive, flowing style.

Neil Andersen
Group Manager Regulation & Pricing