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5 February 2016

Australian Energy Market Commission
PO Box A2249
Sydney South NSW 1235

Submitted electronically

Dear Sir/Madam,

Re: Meter Replacement Process (ERC0182)

Red Energy (Red) and Lumo Energy (Lumo) welcome the opportunity to respond to the Australian Energy Market Commission (the Commission) on the Meter Replacement Process Draft Rule Determination.

Red and Lumo are 100% Australian owned subsidiaries of Snowy Hydro Limited. Collectively, we retail gas and electricity in Victoria and New South Wales and electricity in South Australia and Queensland to approximately 1 million customers.

The Commission have proposed that the incoming retailer will be able to nominate metering roles in the transfer process and that the transfer process will align to the meter exchange, when the retailer elects for this to occur.

Red and Lumo provide in principle support to the Commission's proposal, with drafting amendments to reflect that where the transfer is not a move-in the customer being is able to select when their meter is exchanged, where required. We consider that the proposed subclauses in clause 7.8.9(e) should be separate obligations, and should not apply in a move in situation.

The drafting in clause 7.8.9(e) does not operate practically, as a retailer who wishes to become financially responsible for a site from a particular date and wishes to perform a meter exchange, may not want the transfer date to move to the meter churn date. This is our interpretation of how clause 7.8.9(e) will work in practice.

Additionally, we consider that there should be explicit allowance for the existing meter provider and new meter provider to agree to churn the meter on any other day, even when it relates to a customer transfer. This is not clear in draft clause 7.6.2. As such, we have proposed drafting amendments for the Commission's consideration.

Apologies for the delay in providing the Commission with this submission, and we would greatly appreciate due consideration of the proposed drafting amendments. Should you have any further enquiries regarding this submission, please call Stefanie Macri, Regulatory Manager on 03 9976 5604.

Yours sincerely

Ramy Soussou
General Manager Regulatory Affairs & Stakeholder Relations
Red Energy Pty Ltd
Lumo Energy Australia Pty Ltd

Red and Lumo's proposed drafting amendments based on the draft rule

[1] Clause 7.6.2 Persons who may appoint Metering Coordinators

(c) The Market Settlement and Transfer Solution Procedures must specify that a Metering Coordinator at a connection point is responsible for the metering installation:

(1) in accordance with clause 7.8.9(e), where the change in the Metering Coordinator at a connection point is effected due to a change in the financially responsible Market Participant at the connection point, on the day that the market load at the connection point transfers to the new financially responsible Market Participant; and

(2) otherwise, on any other day.

[2] Clause 7.8.9 Meter churn

(e) The Market Settlement and Transfer Solution Procedures must:

(1) permit an Incoming Retailer to nominate the Metering Coordinator, Metering Provider and Metering Data Provider to be appointed at a connection point in respect of which it is the Incoming Retailer, with such appointments to become effective on the day that the market load at the connection point transfers to the Incoming Retailer as the new financially responsible Market Participant; ~~and~~

(2) where requested by an Incoming Retailer, facilitate the transfer of a market load at a connection point on the same day that a new or replacement metering installation is installed at the connection point, ~~where requested by an Incoming Retailer;~~

(3) permit an Incoming Retailer's Meter Coordinator to arrange the alteration or replacement of a metering installation with the agreement of the existing Metering Coordinator, where the market load at the connection point is related to a transfer that is not a move in.