

8th June 2016

Ms Lily Mitchell
Senior Advisor
Australian Energy Market Commission
PO Box A2449
Sydney NSW 1255

CONSULTATION PAPER

National Electricity Amendment (Using estimated reads for customer transfers) Rule 2016 National Energy Retail Amendment (Using estimated reads for customer transfers) Rule 2016

Dear Ms Mitchell,

Metropolis Metering Services Pty Ltd (Metropolis) is an AEMO accredited Metering Provider and Metering Data Provider with a significant volume of contestable advanced meters installed across homes and businesses in all states and territories in the NEM.

Metropolis welcomes this opportunity to provide a response to the consultation paper for *Using estimated reads for customer transfers*.

Metropolis do not attempt to address the specific questions posed in the consultation paper. Instead, we provide a general view on the state of the market in regards to customer transfers, and the implications for contestable meter providers.

Commentary

As an existing accredited, competitive metering services provider, Metropolis seeks to support innovative energy services through providing advanced metering capabilities.

One of the challenges Metropolis face is the significant delay between consumers identifying a service they want, and when that service begins. The largest element of this delay is frequently the customer transfer to a new Retailer who offers the new service.



Even where the customer transfer is relatively rapid (such as a special read, or where a scheduled read is due shortly after the transfer request), it is not possible to provide a guarantee to the customer of the timeframe. The customer conversations for an advanced metering service includes something like, “Your new service will be available between 20 days and 120 days from now. Unless there is a problem...” This uncertainty is a significant barrier to selling such services.

A house will settle in 60 days. Transferring mobile phone carrier occurs in a matter of hours. Yet it frequently takes up to 90 days (and in the case of access issues, longer) to change electricity Retailer.

While the historic reasons for delays in the transfer process are well known, the comparison with other industries highlights how ridiculous the situation is.

As such, Metropolis consider this Rule change to be important, and that the impact on supporting innovation and related market activities should be considered when assessing the merits of this Rule change.

Sincerely,

Charles Coulson
Regulatory Manager
Metropolis Metering

No additional material for this submission.

END