

8 October 2015

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

Reference: ERC0182

Lodged online: www.aemc.gov.au

Dear Mr Pierce,

RE: Directions Paper Meter Replacement Processes Rule 2015

The Energy Retailers Association of Australia (ERAA) welcomes the opportunity to provide comments in response to the Australian Energy Market Commission's (AEMC) *Directions Paper National Electricity Amendment (Meter Replacement Processes) Rule 2015* (the Directions Paper).

The ERAA represents the organisations providing electricity and gas to over 10 million Australian households and businesses. Our member organisations are mostly privately owned, vary in size and operate in all areas within the National Electricity Market (NEM) and are the first point of contact for end use customers of both electricity and gas.

ERM Power is a member of the ERAA, however as the proponent of this rule change proposal its individual views have not been included in this submission.

The AEMC proposes amending the National Electricity Rules (NER) to clarify that an incoming retailer may only organise a meter exchange or installation if it is financially responsible for the site. The ERAA believes the proposed position outlined in the Directions Paper is preferable to ERM's original rule change request, however we continue to have some concerns with respect to the rule change.

The ERAA agrees with the AEMC that during the retailer transfer period an incoming retailer should be permitted to nominate parties to undertake certain roles at a connection point. The ERAA supports amendments being made to the NER to reflect this position.

One of the AEMC's proposed policy positions is that an incoming retailer cannot require a metering installation to be changed at a connection point until the retail transfer is complete. The ERAA believes that a change should be permitted on the day of the retail transfer, but prior to completion of the retail transfer. We consider this necessary to overcome the issues ERM sought to address in its original rule change proposal, and to provide customers with a positive retail experience.

Additionally, the ERAA notes that application of the proposed rule change in Victoria with respect to large customers is unclear. This issue arises because Victoria has not adopted the National Energy Retail Rules, which provides the definition applicable to the Metering Competition Rule and therefore a large customer's ability to appoint a Metering Coordinator.



The ERAA requests the AEMC clarify how this issue will be addressed to ensure consistent application of the rule change and processes across the NEM.

Should you wish to discuss the details of this submission, please contact me on (02) 8241 1800 and I will be happy to facilitate such discussions with my member companies.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Alex Fraser', with a horizontal line underneath.

Alex Fraser
Interim CEO
Energy Retailers Association of Australia