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28 January 2016

Mr John Pierce  
Chairman  
Australian Energy Market Commission  
PO Box A2449  
SYDNEY SOUTH NSW 1235

Dear Mr Pierce

**ERC0182 - NATIONAL ELECTRICITY AMENDMENT (METER REPLACEMENT PROCESS) RULE 2015 – DRAFT DETERMINATION**

Ergon Energy Corporation Limited (Ergon Energy), in its capacity as a Distribution Network Service Provider (DNSP) in Queensland, welcomes the opportunity to provide comment to the Australian Energy Market Commission (AEMC) on its *National Electricity Amendment (Meter Replacement Processes) Rule 2015 – Draft Determination*.

Ergon Energy supports the overarching framework of the AEMC's Draft Determination. The proposed new meter replacement process strikes the right balance between customer service delivery and ensuring industry participants are able to operate efficiently and effectively via clearly defined roles and responsibilities. As a member of the Energy Networks Association (ENA), the peak national body for Australia's energy networks, Ergon Energy has contributed to and is fully supportive of the issues raised in the ENA's submission.

To ensure the intent of the Draft Determination is effectively enacted in practice, Ergon Energy supports the inclusion of a specific clause in the National Electricity Rules (as detailed by the ENA in its submission) to make it clear that meters can only be replaced prior to retail transfer, in accordance with a commercial agreement between the relevant parties. We do not consider this requirement is sufficiently clear in the AEMC's proposed draft Rule. By extension we also support DNSPs being allowed to enter into commercial agreements on terms that provide the requisite clarity regarding roles, obligations and costs. Such capability is in-line with an overarching principle of the Draft Determination; that being to ensure responsibilities during the meter replacement process remain clear between all parties.

Ergon Energy also supports the AEMC's position that the alternate meter replacement options given consideration to by the AEMC, are not worthy of further consideration.

Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact either myself on (07) 3851 6416 or Trudy Fraser on (07) 3851 6787.

Yours sincerely



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Enc: Ergon Energy's submission