



12 May 2016

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

RRC006 Draft Rule Determination – National Electricity Amendment (Meter Read and Billing Frequency) Rule 2016

Origin welcomes this opportunity to respond to the Australian Energy Market Commission's (AEMC) draft rule determination on meter read and billing frequency lodged by Ergon Energy. We support the more preferable rule determined by the AEMC as it strikes an appropriate balance between the dependency of retailers on the timely delivery of metering data and the delivery of bills to customers at reasonable frequencies.

We understand the reasons motivating Ergon to lodge its rule change and agree that estimated bills can often be a source of customer complaint. Increasing the interval over which a retailer must issue a bill will increase the capacity for retailers to use actual data as the basis of bills.

Origin considers the more preferable rule will reduce the number of customers with actual reads pending to a smaller number (and thus diminish the likelihood of bills issued on an estimate). While Ergon's proposed rule change would allow 120 days for a retailer to issue a bill and significantly reduce the risk of estimated billing complaints, the AEMC's preferred approach of 100 days should provide retailers with more flexibility than is currently available under the National Energy Retail Rules.

We support the application of the draft rule to gas customers and believe that such consistency is important across both fuels, particularly for customers on three-monthly read and billing cycles.

Origin's interpretation of the draft rule is that it does not prevent retailers from continuing to issue bills on a quarterly basis, and the additional time allowed may be used on an optional basis.

Should the AEMC wish to discuss any of the matters raised in this response, please contact David Calder on (03) 8665 7712 in the first instance.

Yours sincerely

A handwritten signature in blue ink, appearing to read "K. Robertson".

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