



02 July 2015

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted electronically

Dear Sir/Madam,

Re: Consultation Paper: Meter Replacement Processes (ERC0162)

Lumo Energy welcomes the opportunity to provide this submission to the Australian Energy Market Commission (the Commission) in relation to the Consultation Paper on the National Electricity Amendment (Meter Replacement Process) Rule 2015 as proposed by ERM Power.

Lumo Energy is a 100% Australian owned subsidiary of Snowy Hydro Limited and is part of the Snowy Hydro retail portfolio which services approximately 1 million customers. Lumo Energy retails gas and electricity in Victoria and New South Wales and electricity in South Australia and Queensland.

In proposing this submission, we have reviewed the rule change request in light of the new arrangements under meter contestability. In light of the submissions received and when developing the draft determination we recommend that the Commission to consider whether different arrangements are required for large and small customers.

Consumer Engagement and Satisfaction

Lumo Energy believes that a prospective retailer can and should be able to manage the customer experience and ensure their customers are engaged and satisfied with the meter replacement process.

Therefore, in terms of the proposed rule change, Lumo Energy supports a prospective financially responsible retailer being able to organise a meter replacement to occur. However, the physical change should only take place once the retailer is financially responsible in the market. In terms of being able to 'organise' the meter replacement, Lumo Energy proposes that a prospective retailer should be able to make the arrangements both contractually and in the market systems. We recommend the Commission review the new Rules to ensure that this is not prohibited. Concurrently, AEMO procedures and systems should allow this process to occur. Lumo Energy believes that the Meter Churn Procedures and the MSATS Procedures may require amendment to allow this to occur.

Ensuring that a retailer can organise meter replacements whilst being the prospective retailer in the rules and amended AEMO procedures, will improve the clarity in the market regarding which roles have responsibilities at the various stages of the process. Furthermore, by allowing a prospective retailer to organise a meter replacement it will allow for market processes to run concurrently with transfer processes, therefore ensuring that there is efficiency in the market.



Implementation

Lumo Energy supports the Commission implementing any amendments associated with this rule change proposal concurrently with the expanding metering competition rule change. However, any timeframe needs to consider any obligations made on AEMO to update the relevant procedures to allow both meter contestability and this rule change, should it be made.

Should you have any questions, please do not hesitate to contact Stefanie Macri, Regulatory Manager on 03 9976 5604 to discuss this submission further.

Yours sincerely

A handwritten signature in black ink, appearing to read "R. Soussou".

Ramy Soussou

General Manager, Regulatory Affairs & Stakeholder Relations
Lumo Energy Australia Pty Ltd