

REVIEW OF THE REGULATORY FRAMEWORK FOR METERING SERVICES

STAKEHOLDER FEEDBACK TEMPLATE

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in the consultation paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

SUBMITTER DETAILS

ORGANISATION: Energy and Water Ombudsman SA

CONTACT NAME: Jo De Silva

EMAIL: jo.desilva@ewosa.com.au

PHONE: 08 8216 1851

DATE 21 January 2021

PROJECT DETAILS

NAME OF RULE CHANGE: Review of the regulatory framework for metering services

PROJECT CODE: EMO0040

PROPONENT: AEMC

SUBMISSION DUE DATE: 11 February 2021

CHAPTER 1 – INTRODUCTION

1. Consideration of other market reforms and related work	
1.1 Are there other significant market reforms that are likely to impact the metering framework that the	We are not aware of other market reforms that are likely to impact the metering framework.

Commission has not identified?	
21.2. Is there additional related work that the Commission should consider in this metering review?	No.
2. Assessment framework – Do you agree with the Commission’s proposed Assessment Framework for this review? Are there any additional criteria we should consider as a part of this framework?	We agree.

CHAPTER 3 – THE CURRENT STATE OF METERING

3. Expectations of meter rollout	
3.1 How does the roll out of smart meters to date compare with your expectations?	n/a
3.2 Is the current pace of smart meter deployment appropriate? What should be the appropriate pace of rollout?	n/a
3.3 What benefits are smart meters providing consumers? Have the benefits changes or improved over time?	<p>The main benefits are the customers can better monitor, manage and adjust their electricity use and export. This has not changed although it may have improved over time with improvements in applications offered by retailers for this purpose.</p> <p>Remote energisation, de-energisation and in particular remote data collection resolves meter access issues, which remains a key benefit for some customers.</p> <p>The expected benefit of time of use and demand based residential energy plans has not yet been fully realised but is expected to improve over time.</p>
3.4 have the prices for smart meters plus the costs of associated products and services changed from the introduction of <i>Competition in metering</i> ? If so, how?	n/a
4. Are incentives in the right place?	

4.1 Are the incentives in relation to smart meter rollout correct? Please provide details on why/why not.	n/a
4.2 Is the current market structure financially viable? If not, for whom is it not financially viable?	n/a
5. Drivers of smart meter rollout	
5.1 What were your expectations regarding the drivers of smart meter rollouts?	n/a
5.2 Has there been any changes in the overall reasons for installing smart meters since the <i>Competition in metering</i> rule commenced?	n/a
5.3 Which parties should be responsible for driving the roll out of smart meters?	n/a
5.4 Do consumers have clear information on the benefits of smart meters and their rights relating to requesting a smart meter?	We do not have any records indicating that information on the benefits of smart meters is an issue for customers. Our data overview at the end of this document suggests that customers are sometimes not aware of their rights relating to requesting a smart meter.
6. Customer experience – what are your views on the customer experience in relation to smart meter rollout and installation?	<p>We receive a variety of complaints related to smart meters including the following:</p> <ol style="list-style-type: none"> No communications coverage Where a Type 4 meter is installed (not by customer request) in an area with limited or no telecommunications coverage, the retailer can still charge an unregulated meter read fee for physical attendances. Meter installation delays Meter installation delays caused by the inability of the Metering Coordinator / Metering Provider to isolate supply for whatever reason e.g. shared fuse arrangement, asbestos in service fuse enclosure, service fuse technical configuration, restricted access to service point etc. Meter installation delays Solar meter or faulty meter installation delay where the metering provider deems the customer installation is non-complaint or unsafe and this is disputed by the customer and his or her electrician. Non-attendance on agreed date Metering Coordinator or distributor does not attend scheduled appointment and the customer does not receive advanced notification of this. Meter test timeframe

	<p>Delays in testing meters for accuracy as there is no regulated timeframe.</p> <p>6. Plug-in meters As far as we are aware there is still no smart meter available in the market to replace all plug-in metering configurations.</p> <p>7. Perceived health and safety While not common we still receive complaints regarding concerns about exposure to electromagnetic radiation from smart meter’s wireless technology.</p> <p>8. Reconnection after a natural disaster We have received notification of meter installation delays following a natural disaster. A question is whether the retailers have a process to deal with metering following natural disasters to minimise disruptions. The issue could also be about coordination and ensuring there is good coordination between parties, not just in cases of shared fuses.</p> <p>We have provided a more detailed list of complaint issues at the end of this document.</p>
7. Industry Cooperation	
7.1 Do you have any suggestions on how industry cooperation can be improved?	n/a
7.2 Are changes to the market structure or roles and responsibilities needed to improve the consumer experience?	n/a
8. Expectations of metering services	
8.1 What expectations did you have around the services that smart meters would provide?	n/a
8.2 What services are being provided by smart meters currently? Are these services widely available?	n/a
8.3 What services did you expect from smart meters which have not eventuated?	n/a
8.4 Are there any services being provided by smart meters which were not anticipated at the time of the <i>Competition in metering</i> rule change?	n/a

9. Collection and use of metering data	
9.1 In relation to metering data, what data should be captured by smart meters, and why?	We believe the NEM 12 standard is quite well thought out and we do not have anything to add.
9.2 In relation to metering data, who should be able to access metering data, and how? What protections should be in place?	n/a
9.3 What impact do you think the Consumer Data Rights may have on the access to, and use of, metering data?	n/a
10. Future metering services	
10.1 What is your understanding of the other services that smart meters can provide?	n/a
10.2 What future services do you expect or want metering to facilitate?	n/a
10.3 If additional services are to be provided by smart meters, how should the costs of providing these services be allocated?	n/a
11. Penetration of smart meters required	
11.1 Are particular metering services only cost effective when a particular penetration is achieved? If so, what services and what penetration is required?	n/a
11.2 What other factors are important in determining whether the provision of particular services are efficient or effective (e.g. geographic spread).	n/a

CHAPTER 5 – ARE CHANGES REQUIRED TO THE REGULATORY FRAMEWORK?

12. Encouraging the adoption of smart meters and future services	
12.1 Is the current regulatory framework appropriate for the current needs of	n/a

metering and the market? Is it flexible enough to provide encouragement for the development of future services in metering?	
12.2 To encourage the higher adoption of smart meters: (a) What changes, if any, need to be made to the current regulatory framework for metering services? (b) What changes, if any, need to be made to other instruments? (e.g. regulatory instruments, guidelines, codes)	n/a
12.3 Are there any other avenues of encouragement that are available that the Commission has not considered in this paper?	n/a
13. Barriers to realising the benefits of smart meters	
13.1 Are there other barriers that were not identified by the Commission that you have found to prevent the realisation of benefits of smart meters and/or slowed the rollout of smart meters in the NEM?	n/a
13.2 What changes, if any, need to be made to the current regulatory framework for current arrangements to improve deployment?	n/a
13.3 Are there other tools outside of the regulatory framework that may address some of the current barriers to realising the benefits of smart meters and/or the slower rollout of smart meters in the NEM?	n/a

OTHER COMMENTS

14. Information on additional issues	EWOSA presents a data overview at the end of this document.
---	---

REGISTRATION OF INTEREST FOR REFERENCE GROUP

If you are interested in nominating for the Review of the regulatory framework for metering services Reference Group you can email registrations@aemc.gov.au or provide details of the person you would like to nominate below:

Name	
Position	
Phone number	
Email address	

EWOSA Data Analysis – Smart Meters

Within the existing categorisation of issues related to smart meters, the following table presents the most common issues and the number of complaints received by EWOSA (excludes enquiries).

The following can be considered as part of issues:

- Inaccurate estimates are more often due to analog meters, that continues to cause complaints. Estimates are also applied upon smart meter data, which causes complaints
- Installation of meters, the timing and associated agreements and billing issues, have been a significant source of complaints in recent years
- Inaccurate reads or delayed reads continue to be issues, mostly with analog meters.

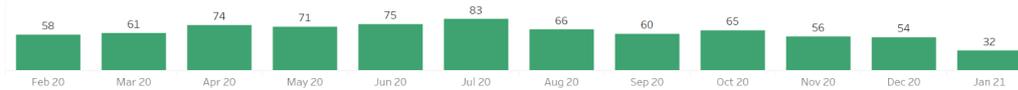
Issue Tier 1	Issue Tier 2	Issue Tier 3	Received			
			2018	2019	2020	Total
Billing	Billing Process	Inaccurate Estimate	311	352	298	961
Provision	Meter Installation or Abolishment	Delay In Abolishment	64	39	53	156
		Faulty Meter Replacement Delay	88	133	125	346
		New Connection Delay	369	114	49	532
		Nonattendance At Agreed Appointment Time	47	5	8	60
		Other Meter Upgrade Delay	80	56	34	170
		Other Metering Installation Complaints	88	97	135	320
		Solar Meter Upgrade Delay	767	527	402	1696
		Meter Tests and Reads	Inaccurate Read	133	32	27
		No Or Delayed Meter Read	104	59	11	174

Text based qualitative analysis on cases (including enquiries) was conducted on 371 cases received during the 3 year period 2018 to 2020 that had mentioned smart meters or was related to the subject. In total 83 of these cases were issues more specifically about the smart meters themselves, distinct from related issues.

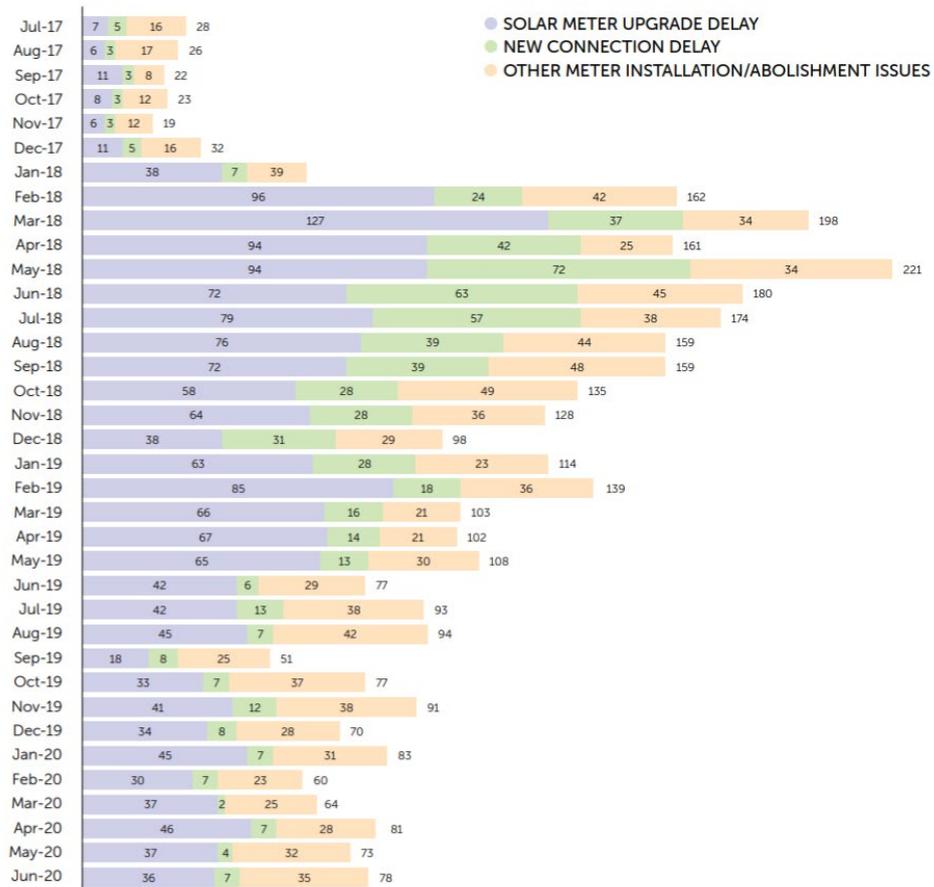
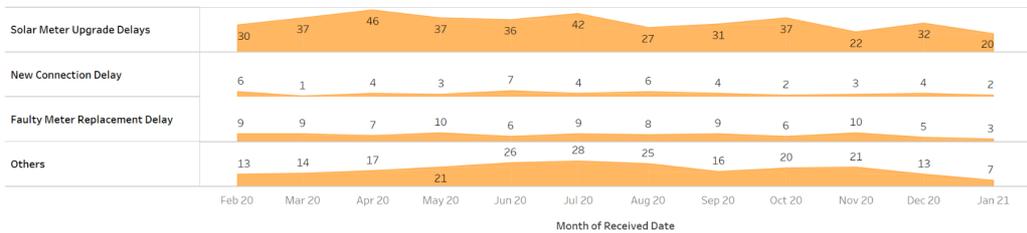
- 17 cases – Customer wants (or wanted to) to opt out of smart meter, concerned about rights or lack of consent, including:
 - Angry about being required to upgrade against customers choice
 - Did not receive option to opt out
 - Does not want smart meter, trying to avoid it
 - Registered to opt out twice, but was told he missed the deadline
 - Retailer requested upgrade to smart meter, customer trying to find retailers that don't require change
 - Tricked into getting a smart meter
 - Wanted to know if customer has the right to refuse smart meter
 - Wanted to know if there are other options aside from smart meters
- 17 cases – Health concerns about radiation/signals, including:
 - Believes smart meter will impact autoimmune disease
 - Concerned about electro-magnetic frequency
 - Concerned about radiation from smart meter
 - Concerned with the health warnings that come with the smart meter and interactions with medication
 - Customer can feel the signal from the smart meter 24/7, affecting him heavily and his medical condition.
 - Extremely concerned about the potential adverse health impacts of smart meters and does not want to put himself or his family at risk.
 - Smart meter has caused health issues and wants the analog meter reinstalled
 - Smart meter will be seriously detrimental to health
 - The smart meter's wifi is causing sickness
 - Wants smart meter removed from home due to electromagnetic forces causing brain disorder
- 16 cases – Wants comms feature disabled or doesn't want to pay for it
- 4 cases – Doesn't want one and has heard on radio (Leon Byner mentioned) that people have had issues once they have them installed
- 4 cases – Installed without consent
- 3 cases – Installed without being aware of it, or no notice
- Numerous cases of claimed higher bills since getting a smart meter (not counted)
- Other issues/concerns raised not grouped:
 - Ok with digital meter but wants it not to be smart
 - Concerned because they don't have internet
 - Concerned the smart meter is consuming too much power

- Incorrect time zone issues set on smart meter
- Retailer said it is up to the tenant to opt out not the owner
- Claims smart meter caused damage to property
- Smart meter installation causing no hot water/wiring issues

MC Cases by Month



MC Issues by Month



METERING COMPETITION CASES BY SUB-ISSUE