

5 February 2021

Ms Ailsa Toomey
Review of the Regulatory Framework for Metering Services
Australian Energy Market Commission
SYDNEY NSW

Dear Ms Toomey

Re: Submission for Project Reference Code EMO0040 - Review of the Regulatory Framework for Metering Services

I was disappointed to read foot note 8 on page 6 of the AEMC Consultation Paper for Project Reference Code EMO0040, that "Victoria is not included in the scope of this review".

I do wish however to submit my consumer experience to this review, as the ongoing issues I have experienced as an Australian Consumer are not unique in Australia, and the ongoing systemic problems created by Governments, Regulators, Retailers and Distributors result in costs and abuse being inflicted on consumers.

As you read and consider my submission I would like you to consider the following important points raised in the following:

Royal Commission into Banking and Financial Services in Australia

- 1 Fees for no service
- 2 Regulators who choose not to utilize their authority to intervene when problems are identified

CentreLink – Robodebt

- 1 You cannot prove a false negative
- 2 Average is not actual

The primary purpose of metering is to provide accurate and factual measurement of kWh's consumed at a premises, for the purposes of Trade Measurement. The Approved Meter is issued with a Meter Number and Registered to an NMI as an Appliance Approved for Trade Measurement. A factual and verifiable history of it's commissioning, programming, testing, Recording of Cumulative Register Readings when any checking or work is done on the meter and it's Decommissioning. The consumer has the right to read and record the Cumulative Register Readings of the meter when they wish to do so and also seek documented evidence if there is a discrepancy between invoicing and Cumulative Register Readings.

In May 2002, I noticed that my Electricity Invoice had increased significantly, and queried it with my Retailer, who abused me for challenging the invoice against my previous energy consumption. The table below shows my home energy consumption from November 1991 when I moved into my home until when the increase occurred.

	Cum Reg Reads Invoices	From Invoices	Correct Use of Cum Reg Readings
Meter No.:	7	7	7
Date From:	27-Nov-91	22-May-02	22-May-02
Date To:	22-May-02	30-Jan-06	30-Jan-06
Total Days:	3829	1349	1349
Cum Reg 3 - Stat	18190	12928	5947
Cum Reg 4 - Peak GH	7986	5947	2438
Cum Reg 6 - Off Peak GL	10204	6981	3509
Cum Reg 7 - Off Peak HWS	37407	16115	13677
Total Invoiceable Registers:	55597	29043	19624
Daily Average all kWh's:	14.52	21.53	14.55
Total kWh's Over Invoiced:		9419.00	

TABLE 1: Actual Meter Readings from Meter No. 7

ANNUALISED:			
	Cum Reg Reads Invoices	From Invoices	Correct Use of Cum Reg Readings
Meter No.:	7	7	7
Date From:	27-Nov-91	22-May-02	22-May-02
Date To:	22-May-02	30-Jan-06	30-Jan-06
Total Days:	365	365	365
Cum Reg 3 - Stat	1735	3500	1610
Cum Reg 4 - Peak GH	762	1610	660
Cum Reg 6 - Off Peak GL	973	1890	950
Cum Reg 7 - Off Peak HWS	3568	4363	3703
Total Invoiceable Registers:	5303	7863	5313
Daily Average all kWh's:	14.53	21.54	14.56
Total kWh's Over Invoiced Per Annum:		2560	

TABLE 2: Annualised Consumption Figures

The Distributor and Retailer had commenced using the Statistical Register 3 as Register 4, Register 6 then became the calculation of the "new" Register 3 less the "new" Register 4. Register 7 then became Actual Register 7 plus Actual Register 4. This resulted in me being overcharged by 2,560 kWh's per annum over a period of 3.7 years. Clearly there was no auditing or verification of invoices to Cumulative Register Readings during this time. I was unaware at the time of how to read my meter. Meter No. 7 was a Digital Screen Meter that was manually read each quarter by a Meter Reader.

On 30 January 2006, meter No. 7 was installed to replace the previous meter after a power surge during a storm damaged the meter. In May 2006, I had installed a Passive Solar Hot Water Pre Heater. And the invoices continued to increase. In August 2008 I called my Electrician who came and we took the Cumulative Register Readings and compared them to the invoices.

	Meter Cumulative Register Readings – kWh's	Retailer Invoiced Quantities – kWh's
Meter No.:	75 [REDACTED]	75 [REDACTED]
Date From:	30-Jan-2006	30-Jan-2006
Date To:	25-Aug-2008	14-Aug-2008
Total Days:	938	927
Cumulative Reg 3 - Statistical	3511	8510
Cumulative Reg 4 – Peak GH	1608	3760
Cumulative Reg 6 – Off Peak GL	1903	4750
Cumulative Reg 7 – Off Peak HWS (Controlled Load)	2674	6757
Total Invoiceable Registers:	6185	15267
Daily Average all kWh's:	6.59	16.47
Total kWh's Over Invoiced:		9082

TABLE 3: Actual Meter Readings Compared to Invoices

ANNUALISED

	Meter Cumulative Register Readings – kWh's	Retailer Invoiced Quantities – kWh's
Meter No.:	75 [REDACTED]	75 [REDACTED]
Date From:	30-Jan-2006	30-Jan-2006
Date To:	25-Aug-2008	14-Aug-2008
Total Days:	365	365
Cumulative Reg 3 - Statistical	1369	3354
Cumulative Reg 4 – Peak GH	626	1482
Cumulative Reg 6 – Off Peak GL	743	1872
Cumulative Reg 7 – Off Peak HWS (Controlled Load)	1041	2662
Total Invoiceable Registers:	2410	6016
Daily Average all kWh's:	6.59	16.47
Total kWh's Over Invoiced:		3606

TABLE 4: Actual Meter Readings and Invoiced Quantities Annualised

We telephoned the Retailer and the Electrician and I contacted the Retailer and were told the following by the Retailer:

The Cumulative Registers on the Meter have nothing to do with the Interval Data and should not be used.

The Cumulative Registers on the Meter had been Zeroed and all interval data destroyed.

The invoices were correct and that if we wanted to know about the Meter we had to contact the Distributor.

We called the Distributor and were advised that the Cumulative Registers on the Meter had been zeroed and reprogrammed on 27 August 2007, and all interval data had been destroyed.

I contacted the Distributor the following day via e-mail, requesting the Cumulative Register Readings from the Meter and confirmation that the meter had been zeroed. They confirmed their claim of the zeroing and reprogramming, without any supporting documentation, but did provide the following Cumulative Register Readings.

Distributor Provided Cumulative Register Readings	Meter Cumulative Register Readings – kWh's	Retailer Invoiced Quantities – kWh's
Meter No.:	75[REDACTED]	75[REDACTED]
Date From:	30-Jan-2006	28-Aug-2007
Date To:	27-Aug-2007	14-Aug-2008
Total Days:	574	352
Cumulative Reg 3 - Statistical	5316	3393
Cumulative Reg 4 – Peak GH	2308	1549
Cumulative Reg 6 – Off Peak GL	3008	1842
Cumulative Reg 7 – Off Peak HWS (Controlled Load)	4503	2510
Total Invoiceable Registers:	9819	5901
Daily Average all kWh's:	17.11	16.76
Total kWh's Over Invoiced:	5865	3580

TABLE 5: Cumulative Register Readings Provided by Distributor

What the Retailer and Distributor were providing me with in addition to false and misleading information and false negatives, was manipulated data. The Cumulative Registers on the Meter had not been zeroed, but the readings had been manipulated. The following table demonstrates how they had manipulated the Readings.

Correct Cumulative Register Readings	Meter Cumulative Register Readings – kWh's	Meter Cumulative Register Readings – kWh's
Meter No.:	75[REDACTED]	75[REDACTED]
Date From:	30-Jan-2006	30-Jan-2006
Date To:	27-Aug-2007	14-Aug-2008
Total Days:	574	927
Cumulative Reg 3 - Statistical	2308	3518
Cumulative Reg 4 – Peak GH	946	1606
Cumulative Reg 6 – Off Peak GL	1362	1910
Cumulative Reg 7 – Off Peak HWS (Controlled Load)	1646	2603
Total Invoiceable Registers:	3954	6119
Daily Average all kWh's:	6.89	6.60
Total kWh's Over Invoiced:		

TABLE 6: Cumulative Register Readings Recorded Correctly

By claiming that the Cumulative Registers had been zeroed, they were able to account for the discrepancy between actual and manipulated data.

The reprogramming did however occur, as the following then occurred in the following twelve months:

Actual Cumulative Register Readings	Meter Cumulative Register Readings – kWh's	Meter– kWh's – Consumed
Meter No.:	75[REDACTED]	75[REDACTED]
Date From:	30-Jan-2006	25-Aug-2008
Date To:	31-Aug-2009	31-Aug-2009
Total Days:	1309	371
Cumulative Reg 3 - Statistical	5910	2394
Cumulative Reg 4 – Peak GH	2757	1149
Cumulative Reg 6 – Off Peak GL	3153	1245
Cumulative Reg 7 – Off Peak HWS (Controlled Load)	4187	1513
Total Invoiceable Registers:	10097	3907
Daily Average all kWh's:	7.71	10.53
Total kWh's Over Invoiced:		

TABLE 7: Cumulative Register Readings and Register Repurposing by Distributor

Table 8 below shows how Meter No. 75 [REDACTED] Registers were reconfigured by the Distributor to hide their manipulation of the meter readings between May 2002 and 14 August 2008.

Actual Cumulative Register Readings	Meter- kWh's Consumed	Meter Cumulative Register Readings – kWh's – Consumed
Meter No.:	75 [REDACTED]	75 [REDACTED]
Date From:	25-Aug-2008	25-Aug-2008
Date To:	31-Aug-2009	31-Aug-2009
Total Days:	371	371
Cumulative Reg 3 - Statistical	2394	1513
Cumulative Reg 4 – Peak GH	1149	636
Cumulative Reg 6 – Off Peak GL	1245	877
Cumulative Reg 7 – Off Peak HWS (Controlled Load)	1513	881
Total Invoiceable Registers:	3907	2394
Daily Average all kWh's:	10.53	6.45
Total kWh's Over Invoiced:	1513	

TABLE 8: Meter Register Manipulation compared to Actual

On 31 August 2009 I had check metering installed at my fuse box at my expense, so that I could record both the Distributor's Meter Readings and the Check Metering in my home. Table 9 shows how the Distributor's meter was behaving very differently to how it was during the period January 2006 to 31 August 2009, once the check metering was installed. I have used the annual consumption figures for the period 31 August 2009 to 8 May 2014 when Meter No. 75 [REDACTED] was removed from the Meter box and replaced with Meter No. 4 [REDACTED]

Actual Cumulative Register Readings	Distributor Meter- kWh's Consumed	Consumer Check Metering
Meter No.:	75 [REDACTED]	GD & HW
Date From:	31-Aug-2009	31-Aug-2009
Date To:	08-May-2014	08-May-2014
Total Days:	1712	1712
Cumulative Reg 3 - Statistical	1391	1391
Cumulative Reg 4 – Peak GH	581	581
Cumulative Reg 6 – Off Peak GL	810	810
Cumulative Reg 7 – Off Peak HWS (Controlled Load)	886	886
Total Invoiceable Registers:	2277	2277
Daily Average all kWh's:	6.24	6.24

TABLE 9: Distributor Meter Compared to Consumer Meter

To demonstrate how the period 31 August 2009 to 8 May 2014 compares to the period 30 January 2006 to 25 August 2008, minus the Distributor and Retailers claimed Zeroing and Reprogramming of the Meter refer to Table 10.

Actual Cumulative Register Readings	Actual Cumulative Register Readings	Actual Cumulative Register Readings
Meter No.:	75 [REDACTED]	75 [REDACTED]
Date From:	30-Jan-2006	31-Aug-2009
Date To:	25-Aug-2008	08-May-2014
Total Days:	938	1712
Cumulative Reg 3 - Statistical	3516	6520
Cumulative Reg 4 – Peak GH	1608	2724
Cumulative Reg 6 – Off Peak GL	1908	3796
Cumulative Reg 7 – Off Peak HWS (Controlled Load)	2674	4154
Total Invoiceable Registers:	6190	10674
Daily Average all kWh's:	6.60	6.23
Total kWh's Over Invoiced:		

The problems over the period have not been resolved, as EWOV, Essential Services Commission, AER, Members of State and Federal Parliament, multiple inquiries into the Electricity Industry, Retailers and Distributors will not recognize that providing false and misleading information regarding Electricity Meters and the information provided from them means that consumers cannot ever have any hope of proving false negatives, such as claims that a Meter has been zeroed and reprogrammed, consumers cannot use the cumulative registers on their Distributor's Meter to check their invoicing. Consumers in Victoria also cannot access NMI records to check if claims of zeroing, reprogramming, testing etc. did or did not occur. On 7 October 2008 when the Distributor Tested the meter, I requested that he check that Register 7 was only recording the Hot Water Service (Controlled Load). He claimed he did not have to check that by Law.

To this day my Retailer claims they cannot even provide the previous and current invoiceable Register Readings on my invoices. The AER provides the following on their web site for consumers, yet Retailers still claim that they cannot do this.

Here's what you should check to make sure your energy bill is accurate

- Your name, address and the date on the bill.
- How much you need to pay (including any credits or money owed from previous bills) and when you need to pay it by.
- Your meter number. The number on your bill should match the number on your meter.
- The billing period: the period in which you used the energy you're being charged for.
- The meter readings that have been used to calculate the amount of energy you've used during the billing period (measured in kilowatt hours or *kWh* for electricity and megajoules or MJ for gas). If your bill is based on an estimate of how much you've used, this should be clearly marked on the bill.
- The amount your retailer is charging you for each kilowatt hour (kWh) of electricity or megajoule (MJ) of gas.
- The supply charge for the billing period (this is a fixed charge for supplying your property with energy, and is not based on how much energy you use).
- Any other fees or charges being applied.
- Any amount credited to your account as part of a rebate, concession, etc.

I will provide you now with two (2) recent incidents of how metering is still failing real life consumers.

1. A neighbour asked me to teach them how to read the Cumulative Registers on their meter. I showed them how, and then tried to reconcile the readings to their Retailers Invoice. Problem 1 – Register 3 (Statistical) was being invoiced as Register 6 (Off-Peak GL), this had resulted in the consumer being invoiced for 11,000 kWh's of energy they had not consumed on one Register alone. Problem 2 – There were no Cumulative Register Readings for the Solar Exports. A non-compliant invoice that could not be easily checked, audited or verified without the consumer having to do a large amount of work.
2. <https://forums.whirlpool.net.au/thread/9qqnr0v9>

b]BACKGROUND:[/b]

New both here (been a reader for ages) and to smart meters having recently installed a domestic solar PV array in rural NSW (Endeavour/RED ENERGY). I have been watching (and daily logging) the data on the meter having read so many horror stories here. Aware of possible issues I requested single tariff (not Time of Day, 'ToD') and a single Controlled Load CL for the off-peak hot water to keep the monitoring 'simple' over at least the first 12mths. (This was granted despite what I read on another thread.) Then will consider moving to ToD tariff and have a benchmark for comparison. SORRY taken a while to get to the issue. Here goes ...

[b]ISSUE: [/b]

I have observed that even when the CL is turned off for even extensive periods (days, even weeks at a time) the meter keeps on adding another 2 or so kWh units of power on that CL circuit each day. That adds up to around 200 kWh (\$30) over a billing cycle. Phoned my supplier (RED) who suggested a meter check costing close to \$700. C'mon! The consultant at RED has forwarded the data log of the usage over the first month or so. He advised me "not to believe the numbers I was reading on the smart meter display"! SO WHAT EXACTLY AM I READING THERE? BEFORE I spend countless hours trying to break down the excel DATA IN 30' intervals over a couple of months and reconciling the numbers, can anyone throw any light on the issue? Was the consultant telling me a 'porkie' or IS THERE AN ISSUE?

THOUGHTS appreciated from fellow users/experts.

Thanks

This was posted on Whirlpool Forums on 21 January 2021. The most important point is that when he has queried his Retailer, they have instantly provided him with false and misleading information by claiming "not to believe the numbers I was reading on the Smart Meter Display".

The problem is with the whole National Energy Market, where providing false and misleading information, manipulating meters, destroying data, failing to have any auditable and factual documents as to what they are doing, ignoring Consumer Rights and failing to recognise that their behaviour is abusive and costly to consumers.

The metering system has failed consumers for almost two decades as a consequence of the attitude and behaviour of Retailers, Distributors, Regulators and Governments both State and Federal. Consumers need a system that can be trusted, audited and reliable. Metering has become like a Poker Machine that has it's programming changed on a moment by moment basis. If meters are to be used for Accurate and Factual Trade Measurement, the responsibility and accountability needs to be placed with an independent Organisation Nation wide that is responsible for the accuracy, accountability and integrity of the meters and the information retrieved from them to protect consumers from what they have endured for the past two decades. Metering in the NEM has run and won it's race to the bottom, and consumers are paying the cost of the Metering Dysfunction.

If you require any further information, I can be contacted via e-mail on

[REDACTED]

Yours faithfully

[REDACTED]

Jenny Thompson