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Jessica Robinson
Director Pricing
Independent Pricing and Regulatory Tribunal
PO Box K35
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2 November 2018

Dear Ms Robinson

IPART's review of retailers' metering practices in NSW

AGL welcomes the opportunity to comment on IPART's draft report on *Retailers' metering practices in NSW*, released on 2 October 2018.

AGL acknowledges that there have been issues with rolling out metering since the commencement of Power of Choice in December 2017. AGL has worked with governments, regulators, metering co-ordinators and other stakeholders to improve systems and processes that have led to faster and more consistent meter installations for NSW residents in more recent times.

It is AGL's view that the best customer experience is for retailers to work with their customers to set appointment times that meet customers' expectations.

To this end, AGL supports the general thrust of the AEMC Draft Determination Rule that sets a nationally consistent safety net timeframe for the installation of meters for a new connection within 6 business days and 15 business days for a meter exchange if a retailer and a customer cannot agree on an appointment. AGL also supports the Draft Determination to provide retailers with the flexibility to provide planned interruption notices for meter exchanges at shorter period (i.e. less than 4 business days), as long as the customer consents.

AGL's response to the Draft Determination is to build on the proposed recommendations. Specifically, AGL recommended that customer should have greater choice in setting appointments. It is AGL's strong view that greater flexibility in appointment setting, whereby customers have the flexibility to agree on a set date or a period of time, will allow industry to maximise the benefits of digital meters through an efficient and effective rollout program.

To be clear, retailers of customers with life support equipment must continue to arrange interruptions on specific dates agreed with or notified to the customer, and not over a period of time.

To ensure that meters are installed in a timely manner and that consumers receive a positive experience, we proposed changes to the Rules which restrict the duration of the range of dates which may be agreed or notified for interruptions as well as the length of time between reaching agreement and the installation of a meter. Specifically, we recommended:

- The range of days cannot be longer than 10 business days;
- The retailer notifies the customer of a planned interruption to occur within the range of days be no later than 5 business days; and
- The retailer should not set the commencement of the period of appointment that is longer than one month after the customer and retailer reach an agreement.



AGL also supports IPART's recommendations that:

- a Level 2 accreditation may be an excessive requirement for certain metering works and, subject to safety regulations, a lower level of accreditation should be available, so that Meter Providers can deploy the resources necessary to undertake all tasks associated with installing a meter; and
- retailers and the Department of Planning and Environment should include more detailed information about the process for applying for a meter. AGL is keen to work with the Department to develop appropriate information sheets for consumers. We already provide information on the AGL website, <https://www.agl.com.au/help/meters-connections/digital-smart-meters>, that not only assists customers with the installation process but also provides an outline of the benefits and new services a digital meter provides to consumers.

Finally, the NSW Government currently has a moratorium on remote digital meter services, until May 2019, whereby retailers are unable to obtain meter reads remotely for digital meters and have to wait for distributors to undertake a manual read. AGL recommends for the removal of this moratorium to enable faster customer transfers. In Victoria, where digital meters have a penetration rate in the high 90 percent range and remote metering services are allowed, most customer transfers are completed within 5 business days after the 10 business days cooling-off period as digital meters are read remotely and retailers can transfer customers remotely. In contrast, in NSW, retailers need to wait until the next scheduled read date by the distributor. This transfer may take up to 3 months to occur. Remote meter services for customer transfers will allow customers to switch to their preferred plan as soon as possible.

Please contact Con Hristodoulidis, Senior Manager Regulatory Strategy on (03) 8633 6646 if you have any questions.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Elizabeth Molyneux'.

Elizabeth Molyneux
General Manager Energy Market Regulation