

28 January 2016

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235



Dear Mr Pierce

Draft Rule Determination: Meter Replacement Processes (ERC0182)

Energex Limited (Energex) appreciates the opportunity to provide a submission to the Australian Energy Market Commission (AEMC) on its draft determination relating to the meter replacement processes rule change request submitted by ERM Power.

Energex endorses the AEMC's rejection of ERM Power's proposed rule which recommended the introduction of "prospective" roles for metering service providers. This proposed rule, if implemented, would have introduced an unnecessary level of complexity and uncertainty in the meter replacement process that would not have been in the long-term interests of electricity consumers. Energex also notes and agrees with the AEMC's view that the issues raised in ERM Power's rule change request will be addressed for large customers when the new metering contestability framework commences.

Energex generally supports the AEMC's more preferred rule which will assist in reducing the time within which a meter can be changed when a retail transfer occurs and provide more clarity regarding the rights and obligations of parties during the meter replacement process. However, Energex shares the concerns raised by the Energy Networks Association (ENA) in its submission on the draft rule determination regarding the need for further clarity on obligations relating to alteration or replacement of metering installations and supports its recommendations with respect to redrafting of the rule.

Energex also shares the ENA's concerns regarding commencement of the final rule in line with the expanding competition in metering and related services and embedded networks rule changes on 1 December 2017. Given the complexity and extent of the changes required to market and participant systems and processes as a result of these rule changes, Energex is concerned that the timeline proposed for implementation of those projects alone will be difficult to achieve. As highlighted in the ENA's submission, the focus should be on those key rule changes and any further rule changes that may jeopardise their timely implementation should be delayed. Energex therefore supports the ENA's recommendation that consideration be given to delaying commencement of the final meter replacement processes rule until after implementation of the metering contestability and embedded networks rule changes.

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Should you have any queries regarding this submission, please contact Charmain Martin, on (07) 3664 4105.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'N Roscoe'. The signature is fluid and cursive, with the first letter 'N' being large and prominent.

Nicola Roscoe
Acting Group Manager Regulation and Pricing