

IIR response template for IN001-21 (NSW/ACT RMP changes to allow some Customer Own Reads (COR) to be recognised as an actual meter reading) – Responses to be emailed to grcf@aemo.com.au by COB 11 October 2021.

Review comments submitted by: The Public Interest Advocacy Centre

Date: 11 October 2021

Contact Person: Bernadette Dodsworth

Please complete sections 1 and 2. Section 3 is optional.

Section 1 - General Comments on the Impact and Implementation Report

Topic	Please Provide Response Here
<p>Sections 1 to 8 of the IIR sets out AEMOs critical examination of the proposal.</p> <p>Does your organisation support AEMO’s examination of the proposal?</p> <p>If no, please specify areas in which your organisation disputes AEMO examination proposal and include information that supports your organisation rational why you do not support AEMO examination.</p>	<p>The Public Interest Advocacy Centre (PIAC) broadly supports AEMO’s examination of the proposal and considers it a practical way of ensuring continuity of meter reads and accurate billing for gas customers during stay-at-home NSW health orders. It is also an appropriate option where the customer prefers to provide an accurate actual meter read under other circumstances of access difficulty.</p> <p>PIAC supports the proposed changes in facilitating more accurate billing for customers choosing to submit a customer own read. Customers have the right to expect accurate bills based on their actual energy usage. However, the ongoing burden of ensuring accurate energy bills must not be unreasonably placed on consumers particularly as many consumers will not be able to utilise customer own reads (either for technological, language, disability, or other reasons). The ongoing responsibility for ensuring accurate reads should rightfully remain the role of a retailer.</p>

	<p>We note AEMO addresses this issue within the proposed <i>Customer own read (actual) methodology</i>, which relies on the consumer initiating the arrangement by downloading and using a mobile application and provides an automatic end to a customer own read arrangement, when the customer does not submit meter readings. These measures address circumstances where a customer is unable or unwilling to provide a customer own meter read, however PIAC supports a provision for customers who are unable to access the mobile app, or provide photographs, to provide customer own reads. For instance, processes should include the option to provide a read of the meter over the phone.</p>
<p>Section 9 and 10 of the IIR set out <u><i>AEMOs recommendation and timeframes</i></u>.</p> <p>Does your organisation support AEMO position to recommend the procedures changes and the timeline for those procedures change to take effective?</p>	<p>PIAC supports AEMO's position to recommend the procedure changes and the proposed timeline for the procedures change to take effect.</p>

Section 2 – Comments on changes

Participants are to complete the relevant columns below in order to record their response.

Retail Market Procedures (NSW/ACT)			
Clause #	Issue / Comment	Proposed text <small>Red strikeout means delete and blue <u>underline</u> means insert</small>	AEMO Response (AEMO only)
Customer Own Read (COR) Actual Methodology			

Section 3¹ – Additional feedback that is not part of this consultation but warrants further investigations / discussions.

Topic	Please Provide Response Here
Does your organisation have any feedback / suggestions that closely relate to the scope or impacts this consultation, but the nature of the feedback / suggestion warrant further investigations / discussion? If so, please included your feedback / suggestions.	

¹ Note - This feedback will be reviewed by AEMO at a later date, therefore will not be used for this consultation. AEMO will complete a preliminary assessment of the feedback assess the feedback and it may then form part of another consultation or the annual prioritisation process