



Ms Alisa Toomey
Senior Adviser
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted online

3 November 2021

Dear Ms Toomey,

Submission to the Australian Energy Market Commission's ("AEMC's") Metering Framework Review

The Energy and Water Ombudsman (SA) Limited ("the Scheme") welcomes the opportunity to comment on the Metering Framework Review.

EWOSA is the independent energy and water ombudsman scheme in South Australia. It receives, investigates and facilitates the resolution of complaints from customers of energy and water providers about (*inter alia*) the connection, supply or sale of electricity, gas or water.

There are four issues which form the focus of our submission:

- For an asbestos service fuse replacement as part of a meter upgrade, who should bear the costs of the service fuse replacement for customer-initiated works?
- With respect to a variation in retail tariffs and charges for a distributor-initiated network tariff reassignment (such as a reassignment to a time of use tariff following a meter change) – does the NERR require advance notice or notice as soon as practicable, and in any event no later than the next bill?
- Paying for plug in meter replacements
- Setting of OPCL time clock

We set out these four issues below.

ISSUE 1

Issue 1 Summary:

- customer initiated meter upgrade request (for solar)
- retailer/Metering Provider ("MP") attends for the meter upgrade and finds an asbestos service fuse (aborts job)
- as the retailer/MP is not trained in safely removing the asbestos fuse, they engage the DNSP to safely isolate supply
- DNSP charges a fee to the MP to complete the isolation and the retailer/MP pass this cost onto the customer.

There do not appear to be any rules stating who should be responsible to bear the cost of the below works (DNSP, retailer/MP or the customer). One outcome could be that the customer bears the cost because they have initiated the upgrade, similar to a customer request to relocate a power pole. Another possible outcome could be that the customer and retailer negotiate who should pay. The Scheme would welcome this matter being clarified in the Rules.

ISSUE 2

Issue 2 Summary:

- retailers have obligations around changes to tariffs and charges in relation to Rule 46 of the NERR. It is a retailer's obligation to give notice of any variation to the customer's tariffs and charges which affects the customer, including where any change is a result of a tariff reassignment initiated by a distributor. However, we have been unable to clarify whether the notice must be advance notice.

The central question is, with respect to a variation in retail tariffs and charges for a distributor-initiated network tariff reassignment (such as a reassignment to a time of use tariff following a meter change) – does the NERR require advance notice or notice as soon as practicable, and in any event no later than the next bill? The Scheme would welcome this matter being clarified in the Rules.

ISSUE 3

Issue 3 Summary:

- plug in meters and retailers not having a direct replacement for the plug in meter.

Whose responsibility is it to pay for the switch upgrade where the only reason for replacement is meter failure?

ISSUE 4

Issue 4 Summary:

- for retailer installed type 4 meters, retailers now manage the time clock hours of operation for approved OPCL appliances. Now, with off-peak controlled load TOU, retailers tend to offer off-peak, solar sponge and peak rates depending on the time of use and therefore there will be consequences for the customer's bills depending on the rates charged for the time that time clock is set.

We have found we are encountering complaints where the OPCL approved appliances are operating at different hours to pre-meter change, or set 24/7 or operating at retailer's peak times.

We are not clear whether retailers have set hours of operation that they advise their customers of, or whether they offer a choice to the customer to set the hours of operation at sign up. Questions for retailers include:

- On what basis do you set the timeclock hours when you move a customer to CL TOU?
- Is there a default time for the hours of operation of the timeclock?
- Does it match the DNSP's off peak times?
- Is it established like-for-like based on the customers previous times prior to the meter change?
- Do the hours assigned, automatically align with the cheaper/off-peak CL TOU rates?
- Do you let customers know that their CL has moved to TOU? And when/how?

- Can the customer request a change to the hours of operation of the timeclock to best suit their needs and/or cheaper off peak rates?

Other issues:

- Clarity around who is responsible for determining whether the customer's switchboard is complaint
- Clarity around the installation of meter isolators. It is not clear who fits the meter isolator as the REC can't fully fit because REC can't isolate supply. Some MP's fit it but other's will not.

Thank you for consideration of this submission. Should you require further information or have any enquiries in relation to this submission, please contact Jo De Silva via jo.desilva@ewosa.com.au or phone (08) 8216 1851.

Yours sincerely,



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