



ENERGY & WATER
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Ms Rebecca Knights
Director
Energy Policy and Projects
Department for Energy and Mining
GPO Box 320
Adelaide SA 5001

[Emailed to ETRConsultations@sa.gov.au](mailto:ETRConsultations@sa.gov.au)

16 February 2022

Dear Ms Knights,

Submission to the Department for Energy and Mining (“the Department”) on the Accelerating the Roll Out of Smart Meters in South Australia Consultation Paper

The Energy and Water Ombudsman (SA) Limited (“Energy & Water Ombudsman SA”) welcomes the opportunity to comment on the Smart Meter Consultation.

Energy & Water Ombudsman SA is an independent Energy and Water Ombudsman Scheme in South Australia. It receives, investigates and facilitates the resolution of complaints by customers with regard to (*inter alia*) the connection, supply or sale of electricity, gas or water.

The introduction of metering contestability was linked to a significant rise in complaints to our Scheme (see attachment 1). Based on our experience, acceleration of the smart meter roll out in South Australia may have unintended consequences if it is not carefully managed. In particular, the following situations are areas where we believe a customer is liable for payment:

- remediation of a non-compliant meter board
- where the supply needs to be isolated by SA Power Networks
- where there is a shared meter board and the old meters are plug in types and there is not enough space in the meter board to accommodate the new meter.

We propose consideration of a fund for vulnerable consumers which they could access in these situations, as was created in Victoria for this purpose.

The connection between smart meters and cost reflective tariffs is another area for consideration. It may be beneficial for customers to have a 6-month period on a smart meter prior to the introduction of their cost reflective tariff – that way, the customer has data to enable them to understand their consumption patterns and the offers that are going to be most suitable for them.

We have received cases where a customer did not know they were going to be transferred to a cost reflective tariff with a meter change, and where they say they would have opted out had they known. This underscores the importance of education to customers about the benefits of smart meters and the related tariffs. The Department may wish to consider whether this education would best be provided by government or industry, or a collaboration between the two.

We have provided some case studies to illustrate these issues (attachment 2).

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.

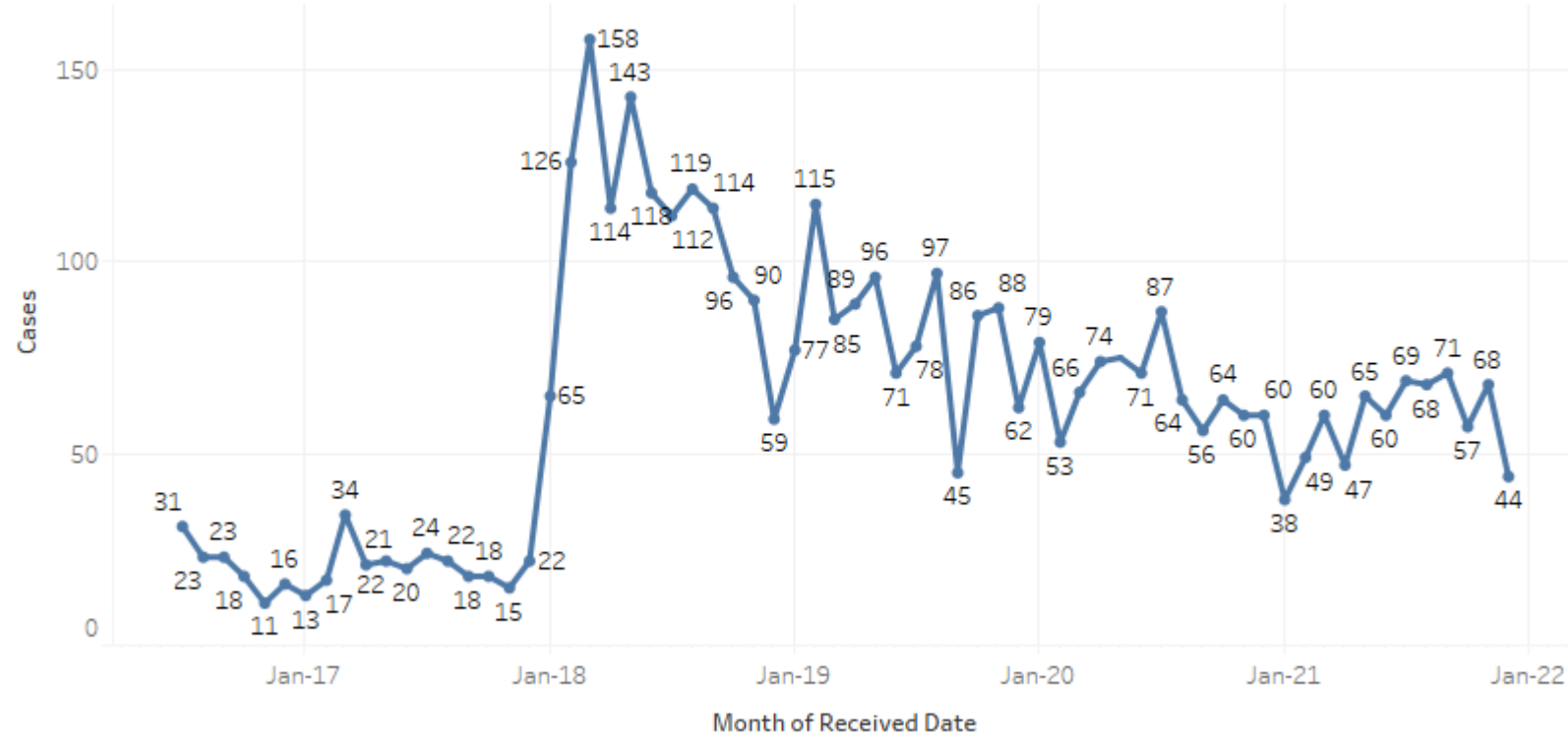
Yours sincerely,



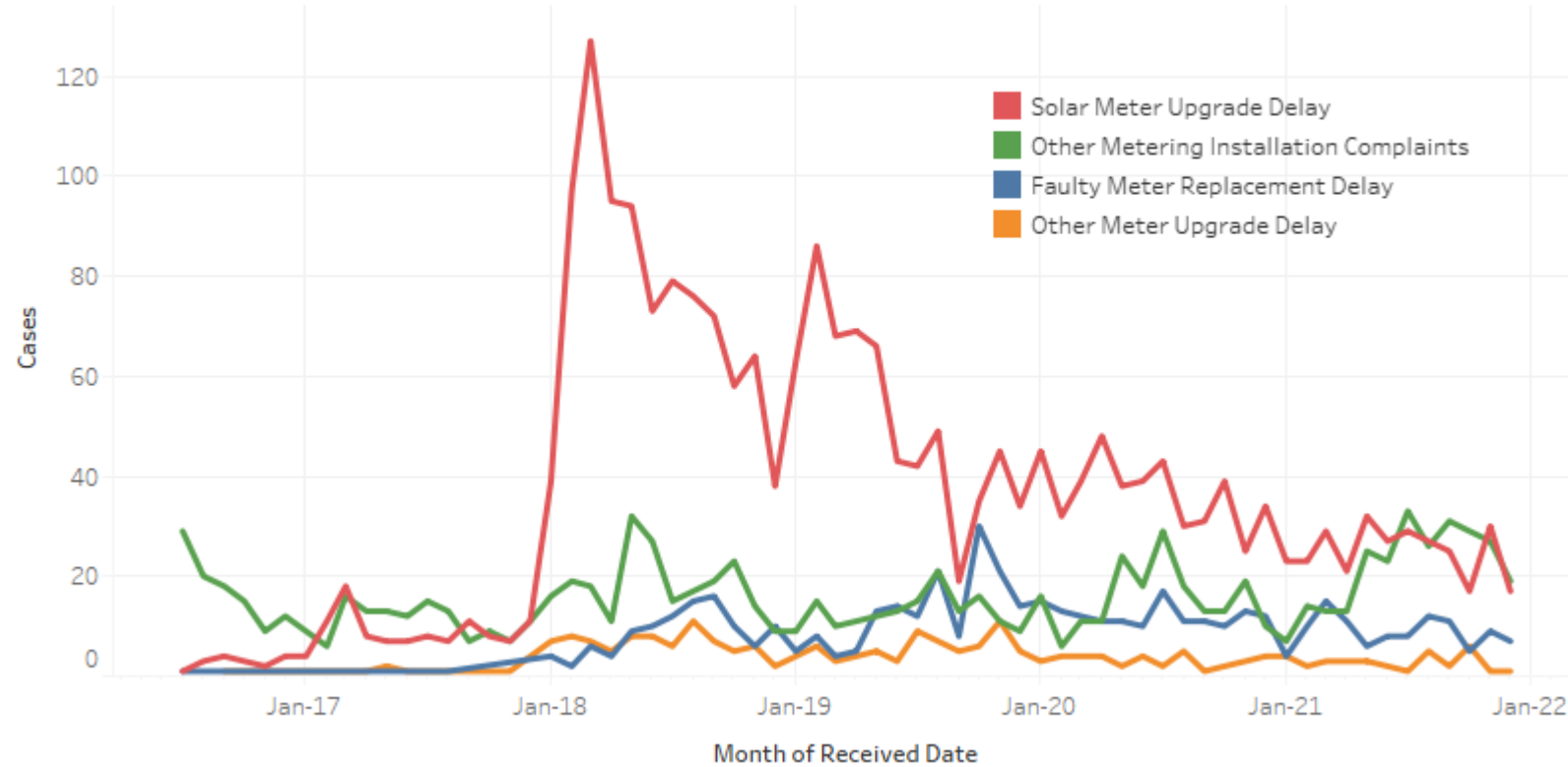
Jo De Silva
Policy and Communications Lead
Energy and Water Ombudsman SA

Attachment 1: Energy & Water Ombudsman SA Metering Cases

Existing Connection - Metering Issues since July 2016



Existing Connection - Metering Issues since July 2016, by Tier 3 issue



Attachment 2: Energy & Water Ombudsman SA Case Studies

Subject: Faulty meter replacement delay

Issues: Provision – Existing connection – Faulty meter replacement delay

Utility: Electricity

Customer Type: Residential

Case Type: Conciliation

The Issue:

Ms B lives in a unit and shares a meter board with residents of the other units. She reported a meter fault as she was without hot water in March 2020.

Her supplier attended in March 2020 to replace the faulty meter but did not have a like-for-like equivalent replacement. Her supplier then advised her that it was her responsibility to upgrade the meter board to fit a replacement meter with the same configuration.

Ms B could not afford this and explained her Strata Corporation would also not pay for this.

Our Review:

We confirmed that it is Ms B's responsibility to make provision for the meter provider to safely house appropriate metering equipment, which may include upgrading the size of the meter board to accommodate the new meter.

Resolution:

While under no obligation to do so, the supplier agreed to pay 50% of the cost to upgrade the meter board.

Subject: Time of Use Tariff/Rate Change

Issues: Billing – Tariff - Time of Use

Utility: Electricity

Customer type: Residential

Case type: Investigation

The Issue:

Mr M's supplier offered a smart meter upgrade as part of a retailer led roll out. Mr M explained he was told that the upgrade would not result in any changes to his rates and charges.

After the meter upgrade, his supplier sent a notice stating his rates had changed from the date the new meter was installed. He was changed from a single rate to a Time of Use rate, which he believed would increase his bills.

Our Review:

We found that Mr M had the option to opt-out of the smart meter upgrade but chose not to on the basis that he was incorrectly told his rates would not change. He was not required to upgrade his meter for any other reason at that time.

Resolution:

The supplier offered to backdate a cheaper Time of Use energy plan and provided a \$1,000 credit as a gesture of goodwill. Mr M accepted this offer.