

8 December 2006

Manager, MCE Secretariat
Department of Industry, Tourism and Resources
GPO Box 9839
Canberra ACT 2601

By email to MCEMarketReform@industry.gov.au

Dear Sir / Madam and Standing Committee of Officials,

Consultation Working Paper by Retail Policy Working Group

Thank you for the opportunity to contribute into the Retail Policy Working Group's consideration of retailer – small customer arrangements. SP AusNet is not a retailer, and hence not directly involved in the market, however we wish to draw the RPWG's attention to several matters at the Retailer-Customer-Distributor interface for consideration.

1. Consumer Metrology Obligations

The industry and NEMMCO are currently drafting changes to the Rules and the national Metrology Procedure to move the industry metrology obligations currently in the Jurisdictional metrology codes (in Victoria: the Electricity Customer Metering Code (ECMC)) to these national documents. This will leave a relatively small number of non-industry or non-metrology matters in the remnants of these Jurisdictional metrology codes. The majority of these "left over" clauses refer to obligations on consumers/customers with respect to metrology matters. Most of these obligations are nationally consistent and refer to such matters as access to meters, rights with respect to access to data or requests for tests etc, some cost matters e.g. for requested tests where data proves OK.

The industry through the Retail Market Executive Committee (RMEC) has agreed that it is appropriate and desirable that these "consumer metrology obligations" be incorporated in a national document. The RMEC has approved the appropriate industry working group to prepare such a document. In its development, an aim would be to rationalise any jurisdictional differences, and where this is not possible utilise a Table of Jurisdictional Differences approach similar to that used in the national Metrology Procedure.

We understand that NEMMCO has discussed this approach with jurisdictions and jurisdictional regulators through the NEMMCO convened RMNOC committee, that this group was notionally in support and requested further development of the consumer metrology obligations document. At this point the mechanism whereby the national consumer metrology obligations document attains authority remains to be determined.

SP AusNet considers it is appropriate that consumer metrology obligations including how these are imposed be considered in the Working Papers (possibly in Working Paper 1) and also in the composite consultation paper to be drafted and released in the second quarter of 2007.

2 ESC/Victorian industry End to End Review

As a result of some reported consumer concerns the ESC facilitated a review of the customer transfer process (with particular focus on customer move-in scenarios). The ESC published draft recommendations from this review, which included some changes to aspects of the customer transfer and related processes in Victoria. The ESC has yet to release and final decision and implement process changes.

SP AusNet has not considered how all of the recommendations may impact on the move to national regulation, however one recommendation which may impact on national process requirements is that associated with improving meter reading access to customers premises. This involved placing an obligation on Retailers to actively request a special read where two scheduled reads have been missed because of customer actions. This proposal could be outlined in Attachment 1 to the Working Paper under the subject of "Meter access" (Page 49).

If you have any queries relating to the matters discussed in this letter please contact our Peter Ellis, our Network Market Services Manager on 03 96956629.

Yours sincerely,

[Letter sent by electronic mail]

Kelvin Gebert
MANAGER REGULATORY STRATEGY

