

1 November 2018



Dr Peter Boxall
Chair
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop NSW 1240
Submitted via IPART website.

Dear Dr Boxall,

Review of retailers' meter installation practices in NSW draft report

The Public Interest Advocacy Centre (PIAC) is an independent, non-profit legal centre based in New South Wales. Established in 1982, PIAC tackles systemic issues that have a significant impact on people who are marginalised and facing disadvantage. We ensure basic rights are enjoyed across the community through litigation, public policy development, communication and training. The Energy + Water Consumers' Advocacy Program represents the interests of low-income and other residential consumers, developing policy and advocating in energy and water markets.

PIAC welcomes the opportunity to respond to the draft report from IPART's Review of retailers' meter installation practices in NSW.

We agree with IPART's opening statement that "retailers are not delivering an acceptable level of service to customers requesting a meter".¹ In our fact sheet submission, PIAC outlined the various ways in which retailers were not providing acceptable service, including:

- Installation delays;
- Poor communication; and
- Inadequate information about the services provided by a smart meter.

PIAC notes that IPART considers, in most cases, the first two issues will be addressed by the AEMC's draft rule on metering installation timeframes.

PIAC supports IPART's approach

Like IPART, PIAC supports the AEMC's draft rule to introduce metering installation timeframes for retailers. We consider that timely implementation and enforcement of this rule change from 1 January 2019 will address many of the meter installation delays faced by NSW consumers.

Therefore, PIAC supports IPART's approach in the draft report, to focus on meter installations that would be exceptions to the draft rule.

PIAC supports IPART's draft recommendations

Considering the approach discussed above, PIAC also considers IPART's recommendations to be appropriate.

¹ IPART, [Retailers' metering practices in NSW – Draft report](#), October 2018, 5.

Recommendation one seeks to simplify regulatory arrangements and allow a single party to undertake all works necessary for meter installations. Given the coordination issues discussed above, PIAC supports this recommendation.

There is some irony in this position. PIAC notes that, before December 2017, there was indeed a single party responsible for meter installations: distribution network service providers.

PIAC also supports recommendation two, that the NSW Department of Planning and Environment provide more information on metering for consumers. Given the current confusion among consumers about metering, this is appropriate. We agree that, combined with new requirements under the metering installation timeframes rule, this will improve information provided to consumers about smart meter services.

Implementation of these reforms should be progressed as soon as possible

PIAC contends that the NSW Government should act to implement IPART's recommendations as soon as possible. The level of consumer detriment identified in the draft report, and in the fact sheet submissions from PIAC, the Energy & Water Ombudsman NSW² and others, is such that this is necessary.

Continued engagement

PIAC would welcome the opportunity to meet with IPART and other stakeholders to discuss these issues in more depth.

Yours sincerely,

Tim Harrison

Policy Officer, Energy and Water
Public Interest Advocacy Centre

Direct phone: +61 2 8898 6518
E-mail: tharrison@piac.asn.au

Craig Memery

Policy Team Leader, Energy and Water
Public Interest Advocacy Centre

Direct phone: +61 2 8898 6522
E-mail: cmemery@piac.asn.au

² EWON, [Review of electricity retailers' meter installation practices in NSW](#), August 2018.