

A few  
words.

16 August 2010

**Dr Ron Ben-David**  
**Regulatory Review – Smart Meters Draft Decision**  
**Essential Services Commission**  
**Level 2, 35 Spring Street**  
**MELBOURNE VIC 300**

Dear Dr Ben-David,

### **Regulatory Review – Smart Meters Draft Decision**

AGL Energy Ltd (**AGL**) welcomes the opportunity to provide this submission to the Essential Services Commission (the **Commission**) in response to its Regulatory Review – Smart Meters Draft Decision (dated July 2010) (the **Draft Decision**).

Before discussing the specific key issues as identified in the Draft Decision, it should be noted that AGL considers that regulatory changes should, at this stage, be kept to a minimum. Smart meters are being gradually rolled out in Victoria during the next few years and it will take some time before the industry and community has sufficient understanding of the impacts of its change. As such, AGL considers it would be premature to embark on major regulatory changes now.

Whilst the proposed enhancements have potential benefits for customer billing in a smart meter environment, these changes will require significant system modifications, which we estimate it will take at least 12 months to implement. AGL is willing to discuss this further with the Commission, including providing a 'mock' bill to show the level of changes that are being proposed through this Draft Decision.

AGL strongly submits that any changes within the Victorian regulatory framework should be considered within the context of the national smart metering framework to ensure national consistency where possible. We also note that the customer implications of smart meters are being considered within the National Energy Customer Framework (**NECF**).

Specific responses to the Draft Decision are discussed in the attachment. Note that we have used the Draft Decision numbering to allow easy cross referencing.

Should you wish to discuss this submission further please contact Sallie Proctor, Manager Regulatory Compliance and Advice on 03) 8633 7871.

Yours sincerely,



Alex Cruickshank  
Head of Energy Regulation



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### 3 | ASSISTING VULNERABLE CUSTOMERS

#### Draft Decision

For customers on a smart meter tariff in retailers' hardship programs, retailers will be required to:

- Agree with participants the most cost-effective tariff based on their behaviour and circumstances known at the time of entry to the program
- Monitor participants' behaviour and consumption during the program to ensure that they continue on the most cost-effective tariff and facilitate a change if necessary
- Not offer supply capacity control products until 31 December 2013.

These obligations will be included in Guideline No 21: Energy Industry – Energy Retailers' Financial Hardship Policies.

The amendments will take effect from 1 January 2011 as they involve minimal process and system changes.

AGL accepts the underlying principle expressed by the Commission in its Draft Decision as commendable. However the following points must be considered:

- Retailers can recommend the most cost-effective tariff based upon the customers behaviour and circumstances, however retailers are only able to apply this tariff if the customer provides their consent. Retailers are not able to force a customer to accept this recommendation and therefore retailers cannot be explicitly accountable should the most cost effective tariff not be in place.
- Similarly, while retailers review customers on their hardship programs periodically as a support mechanism it is not fair and reasonable to expect a retailer to perform detailed analysis of consumption data on an ongoing basis for each of its hardship customers, therefore the monitoring responsibility should not be absolute in its applicability to the retailer.

It is our understanding that the supply capacity limiting functionality services in Victoria is not a mandated service being provided as part of the initial rollout. As documented within the Advanced Metering Infrastructure-Minimum AMI Service Levels Specification (Victoria) September 2008 Release 1.1:

*During the period of the rollout, the focus of the AMI Program will be on deployment of AMI systems and implementation of the following capabilities:*

- *half-hourly interval data;*
- *remote reading of AMI meters;*
- *remote de-energisation; and*
- *remote energisation.*<sup>1</sup>

Retailers will not have the mechanism to request meter settings to support any supply capacity management offerings to a customer. Nor, if requested by a retailer, are there any legislated service levels for distributors to adhere to a retailer's request. It is our understanding that the concept of supply capacity limiting is a service that may be

<sup>1</sup> Advanced Metering Infrastructure-Minimum AMI Service Levels Specification (Victoria) September 2008 Release 1.1

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introduced once the National Smart Meter Framework is in place by 2013 and will be supported by the appropriate consumer protections being considered as part of the NECF.

AGL believes the supply capacity question is similar in nature to the vexed issue of doorknockers. Does the imperative to protect one group from the impact of a change infringe upon the right of others to benefit from the same change? AGL believes that serious consideration of all impacts of supply capacity management must be addressed in a rational and structured debate of wider perspectives than those offered in this Draft Decision.

We understand the need for any supply capacity management products to be subject to a greater degree of consultation than other retail products to address the concerns of all stakeholders and would support a recommendation including this requirement.

## 4 | PROVIDING INFORMATION AND INFORMED CONSENT

### 4.2.1 Verifying the accuracy of the bill

#### Draft Decision

The following must be shown on all customers' bills derived from internal data:

- The total accumulated consumption read corresponding to the end of the billing period
- The consumption by tariff segment, price for each tariff segment and the total consumption for the period.

Retailers can determine their own format for this information, but it must be clear, understandable and not confuse customers.

Retailers will be required explain the new bill formats based on interval data from smart meters to customers, including but not limited to, the change from beginning and end reads to total accumulated consumption and the consumption by tariff segments, total consumption for the period and tariffs.

AGL agrees with the Commission that it is important for customers to be able to verify their usage against their bill. However, AGL does not believe that providing the index read on a smart meter bill will assist a customer trying to verify their consumption. At best, the index read could only be a low accuracy check, providing some continuity with the accumulated energy recorded by current meters. At worst, the provision of the index read will confuse customers as they will be unable to use the index as a 'start' and 'end' read to verify their actual consumption for a billing period.

There is currently no obligation for distributors to provide the index read, although the smart meter service levels in Victoria requires that the accumulated consumption be routinely collected and provided to the retailer daily, this will only apply from 1 January 2012. Until the service levels come into force this places an obligation on retailers that is unachievable.

AGL recommends the Commission refers this item to the National Smart Meter Program (**NSMP**) to assess the requirement and develop a proposed solution that may be implemented nationally.

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## 4.2.2 Estimated and substituted data on bills

### Draft Decision

Clause 5 of the Energy Retail Code will be amended so that:

- retailers must indicate that the bill is estimated when more than 5 per cent of the interval metering data that is used to determine the billed energy consumption are not actual readings from the smart meter
- when any interval metering data from a smart meter is required to be substituted to determine the energy consumption in the bill, the retailer must either:
  - (a) indicate on the bill that the bill is substituted and the extent of the substitutes; or
  - (b) not charge in the bill for energy consumption for each interval that is substituted.

The Commission currently collects data on the number and proportion of estimated bills issued by retailers. The performance indicators will be expanded to include the number and proportion of bills issued with substituted data.

The Commission will recommend to the Australian Energy Regulator (AER) that the extent to which the distributors substitute data in the interval data provided to the retailers is also monitored.

Currently retailers are allowed to recover between 9-12 months of undercharging. When smart meters are more fully operational and monthly billing of customers more prevalent, the Commission will review clause 6.2 of the Energy Retail Code to determine if a shorter period should be introduced

While AGL supports the Commission's concept of an estimated consumption threshold, we believe that this can only be implemented once all concerns have been addressed.

AGL has several concerns with the current concept:

- The estimated consumption threshold of 5 per cent of the interval metering data for a billing period should only be adopted once all metering data is being provided to retailers daily. The smart meter service levels in Victoria require distributors to deliver daily metering data to retailers by 6am the next day from 1 January 2012. AGL considers that this component of the Draft Decision can only be implemented at this time.
- The collection, processing and delivery of metering data for small customer sites are outside the control of retailers. Distributors are the 'Responsible Person' for the delivery of data.

Risks and costs will be borne by the retailers unless the Commission intends to enforce auditable monitoring of the accuracy of:

- meter data that retailers receive from the distributors;
- standing data in MSATS; and
- what is billed to retailers by the distributors, otherwise.

We note that the scope of the Commission's review<sup>2</sup> was to amend relevant regulation impacted by the operation of smart meters in Victoria. The Draft Decision has not, however, been limited to smart meters. If the intent of the Draft Decision is to apply the estimation threshold to all interval meters then AGL is not able to support this concept.

AGL can therefore only support the concept in this Draft Decision if:

- the scope is limited to smart meters in Victoria;
- it is effective from 1st January 2012 when the obligation for distributors to deliver daily metering data is mandated; and
- the appropriate mechanisms are in place to enforce accuracy and timeliness of the delivery of meter and standing data by the distributors

The alternative approach proposed by the Commission is to provide retailers with the choice not to charge customers for each interval that is substituted. It is AGL's view that this may leave retailers exposed to unrecoverable consumption and costs. We deem this to be unreasonable, noting that retailers will still be billed for substituted consumption by a distributor. If the Commission considers that this is a viable alternative then the Commission may consider extending this proposal to limit the distributor's in their ability in providing substituted metering data to a retailer.

AGL is of the view that regardless of how frequent the meter reading is obtained and delivered, the existing recovery period for undercharging should be retained. It is our view that there isn't a link between the receipt of daily data and the monthly billing of a customer that would be the trigger to amend the undercharging provisions.

Undercharging occurs for a number of reasons including:

- Customers querying their bills;
- The detection of retail billing exceptions or system issue;
- Distributor discovering a data error, faulty meter or equipment;
- Distributor or MDP system issues or delays in providing the actual data;
- Human error, revised network billing charges and a number of other factors that not necessarily controlled by retailers; and
- Meters may have been transposed across customers or hung incorrectly or the builder may have changed around the house numbers or electricians may even have wired it incorrectly on the customer's side of the meter

Clause 10.1 of Energy Retail Code (**ERC**) currently enables the establishment of shorter billing cycles to be agreed between retailers and customers. At this point we also note that the ERC provides coverage for gas and that gas is billed at a frequency of a minimum of every two months. The existing undercharging provisions are in place for customers who receive their electricity bill at a frequency of less than once every three months in addition to gas customers.

It is AGL's view that the Commission has not established a satisfactory link between the installation of a smart meter and a requirement to review the recovery provisions within the ERC. Therefore the Commission have not established a basis for reviewing this component of the ERC.

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<sup>2</sup> ESC REGULATORY REVIEW – SMART METER REVIEW SCOPE 19/03/2010

### 4.3.1 Graphical information on the bill

#### Draft Decision

Clause 4.4 will be amended to include the requirement that retailers show on the consumption graphs:

- The customer's consumption for each monthly period over the past 12 months; and
- the average daily cost for each smart meter tariff component over the billing period.

AGL is firmly of the view that the Commission should not over-prescribe the graphical information on the bill, particularly given the degree of variability within tariff designs. Bill layout is also one area where retailers may wish to differentiate themselves and, if the Commission mandates too much, it may risk stifling innovation within the market.

AGL recently completed a Bill Redesign Project and can share some of the things that we learnt (Additional information on costings can be provided to the Commission privately if required). We note that, while our Bill Redesign Project was essentially changing the display of existing information, our learnings may provide the Commission with an understanding of some of impacts of what has been proposed.

Our initial analysis of the changes proposed within the Draft Decision has identified that they will have considerable impacts on internal billing systems. These impacts include changes to existing calculation methodologies, introducing new calculations requirement as well as implementing new processes. We also consider that the changes will potentially require a significant amount of new customer collateral.

The Commission has made several decisions relating to the look and feel of the current bill. Proposals include:

- Improving the information on the bill;
- The display and validation of estimated/substituted data and; and
- Options to graphically represent consumption and costs

While the proposed enhancements have potential benefit for customer billing in a smart meter environment, these changes will require system changes that will require more time to implement than the effective date proposed by the Commission. We estimate that the new changes will take at least 12 months to implement.

We anticipate that the bill will also need to be increased by an extra page to accommodate the suite of proposed graphical information.

There are also increased operational costs to be considered:

- increased processing cost at the mail house;
- additional material to explain the bill;
- stock design, stock print, mail house implementation & processing;
- I.T and business costs (If requested, AGL can provide these costs to the Commission); and
- Training and process changes for our customer facing staff.

Finally, AGL notes the cost implications associated with amending the bill now, given that further changes will presumably need to be made again once the NECF process is completed should be considered.

### 4.3.2 Unbundling tariffs and charges on the bill

#### Draft Decision

We will retain the current requirement that it is the retailer's decision as to whether to show the network charges on the bill.

That is, under clause 4.2(i), if the retailer directly passes through a network charge to the customer, the separate amount of the network charge must be shown on the bill. This charge must replicate the regulated charge.

As the Commission is aware, charges are comprised of several different tariff components – retail, distribution and transmission components, as well as market charges. Any further unbundling of charges is not a matter requiring regulation - rather, this may be something which some retailers choose to do as a way of differentiating themselves in the market. AGL does support the Commission's Draft Decision to retain the current requirement under clause 4.2(i).

### 4.3.3 Notification of variations to tariffs

#### Draft Decision

Clause 26.4(b) of the ERC will be amended to require retailers to notify the customer of any variation to the retailer's tariffs at least one month prior to the date of effect.

This notification must be separate to the customer's bill.

The notification will apply to existing tariffs and any new smart meter tariffs.

Clause 9.8 of the default Use of System Agreement will be redrafted to ensure that the distributors advise the retailers of the network tariff changes in a timely manner, so that the retailers can meet their new obligations

AGL does not support the Commissions' Draft Decision and believes that any change to clause 26.4(b) of the ERC is premature. We note that the Victorian Government is currently consulting with retailers and distributors through the AMI Policy Committee (**Committee**). This Committee was established by the Department of Primary Industry (**DPI**) for the purpose of determining the transitional arrangements for offering any new smart meter tariffs.

We request that the Commission delays any decision regarding amendments to clause 26.4(b), specifically relating to advanced notification of changes to existing and Smart Meter related tariffs, pending any decision from the Victorian Government. We note that AGL made this point in an earlier submission to this review<sup>3</sup>.

The scope of the Regulatory Review published by the Commission stated that all relevant regulations were to be reviewed to decide whether or not amendments are required because of the operation of smart meters in Victoria.<sup>4</sup>

<sup>3</sup> AGL's Submission Regulatory Review – Smart Meters 25 May 2010

<sup>4</sup> ESC REGULATORY REVIEW – SMART METER REVIEW SCOPE 19/03/2010

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The amendments to clause 26.4(b) of the ERC being proposed by the Commission require retailers to provide one month's prior notice for changes to existing tariffs in addition to any new smart meter tariffs. We consider the inclusion of existing tariffs to be outside of the scope of this review.

AGL considers the Commission should clarify if a retail tariff change occurs when a customer moves from one retail tariff to another or if a retail tariff change occurs when there is a pricing and structure change to an existing retail tariff.

We believe it is insufficient to merely amend the Use of System Agreement (**UoSA**) to require distributors to advise the retailers of the network tariff changes in a timely manner as this will not ensure that retailers receive appropriate notification before a tariff changes. Clause 9.8 of the Default Use of System Agreement should be redrafted to require a distributor to provide notification of the network tariff change in a timely manner and to provide an effective date for the change, which must be no less than 60 business days from taht notification.

We would also like to bring the Commission's attention to potential negative impacts of the Draft Decision:

- Customers who install a solar energy system and request a retail tariff change will be required to receive at least one month's prior notice of a change to their retail tariff, thus delaying any benefits that the customer may receive when requesting a Premium Feed-in Tariff (PFIT).
- Within Section 3 of the Draft Decision - 'Assisting Vulnerable Customers' – retailers are required to monitor consumption and agree with a customer their most appropriate retail tariff. The notification requirement means that any change could not take effect for at least 30 days.

#### 4.4 | Shopping around for a better offer

##### **Draft Decision**

The Commission will commence a review of Guideline No.19: Energy Price and Product Disclosure in January 2011, taking into account the smart meter tariffs that are likely to be offered to customers and the work being undertaken by the AER.

The current options customers use to compare and make decisions to change their retailer (education on tariff structures and third party websites) are sufficient tools within the current market environment. It is expected that Retailers will develop a set of independent tools, or enhance the current suite, to take advantage of the smart meter rollout. Hence, this differentiation is preferred to any review and changes to the current guidelines.

AGL again<sup>5</sup> asks the Commission to consider the speed at which customers will be able to transfer to a new retailer in a smart meter environment. There may be customer protection implications as, due to the increased speed in the provision of meter data, transfers will complete at a much faster pace. This means that there will be less opportunity for retailers to discover and investigate errors prior to a transfer completing and customers are likely to be the first to realise an error has occurred - and may only do so when they receive a final bill from their current retailer.

<sup>5</sup> AGL put this view in previous submissions.



While we acknowledge that this is currently outside the scope of the review, the Commission needs to consider whether it would be appropriate to extend the transfer period (say, to 30 days, allowing for a 10 day cool-off plus 20 day block on transfers). This will increase the likelihood that unauthorised transfers will be discovered during intervention processes and be resolved. It will also ensure customers fully understand that they are transferring retailers and any impacts of the transfer, such as early termination fees, and fulfil the notice period of contracts where they apply.

If required, AGL can provide the Commission with analysis of the estimated numbers of unauthorised transfers and the potential cost implications.

## 5 | ENABLING ACCESS TO BILLING AND METERING DATA

### 5.5.1 Access to metering data

#### Draft Decision

The provision of historical billing data will continue to be regulated under clause 27 of the Energy Retail Code.

Retailers should provide metering data to existing (and former) customers. Clause 27 will be amended in the Energy Retail Code to enable customers to access their metering data as follows:

- If requested by a customer with a smart meter, retailers will be required to provide interval data electronically, or by some other form, in a way which makes the information understandable and accessible to the customer.
- Retain and provide this information to existing and former customers with the same obligations as under clause 27.2

In connection with In Home Displays (IHDs), the Commission will incorporate new provisions in the relevant regulations to require:

- Both retailers and distributors to establish a set of privacy principles for the dissemination of consumption information through IHDs, before they are utilised.
- Retailers, in providing IHDs to their customers, to provide information to the customers setting out how the consumption and cost information displayed on the IHD compares to the consumption and cost details on the customer's bill.

AGL considers that the provision of historical billing data does not change when a Smart Meter is installed. The current provisions are adequate for manually read interval meters. There is currently no defined regulatory standard on how billing information should be presented and AGL does not see any benefit in the Commission establishing a minimum standard regarding how the data should be presented. We also consider that any such regulation may restrict future innovation.

AGL does not support regulating areas of provision of In Home Displays (**IHD's**) as this may be a barrier to innovation and would minimise the benefits and choice to customers.

We acknowledge that the provision of IHD's or any device in the customer's home that displays meter data or metering information must be a secure device on the Utility Home Area Network (**HAN**). We note that that the IHD will provide additional benefits and will enable customers to better understand and manage their energy consumption, which will lead to potential cost savings and more effective use of smart meter tariffs. We accept

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that there will be a responsibility on retailers to ensure customers have the knowledge and support to effectively understand and use this data.

Currently within Victoria this service, and visibility to this information, is not available (nor is there a mechanism to request this service from the distributors). It is our view that the Commission should not be able to constrain or limit the type of information being made available to the customer via IHD's. It should be noted that the information displayed in IHD's will not be limited to verification of a customer's bill.

AGL notes that the Commission is proposing that distributors establish a set of privacy principles for the dissemination of consumption information through IHDs. However, the Commission appears not to have considered that 3<sup>rd</sup> party providers may also provide this type of services. Industry should work with 3<sup>rd</sup> party vendors to ensure that a set of privacy rules are in place to protect the dissemination of customer information. Given their experience in the market with customers, suppliers and legal entities, 3<sup>rd</sup> party vendors may be ideally positioned to assist in the establishment of privacy policies and provide appropriate guidance to retailers in this process.

AGL strongly believes that there should be on competitive neutrality for the provision of these services. Distributors are regulated businesses and there is a real concern that distributors may be entering into the area of providing retailing type services in Victoria. This, in turn, is due to the limited services and information being offered to retailers by distributors.

AGL believes that this is outside of the scope of the review and it is too early to be considered unless the Victorian Government, through the AMI Committees, changes the existing minimum service obligations that distributors are mandated to provide.

## 6 | REMOTE CONNECTION, DISCONNECTION AND RECONNECTION

### 6.1 Prompt connection, disconnection and reconnection service

#### Draft Decision

To amend the relevant clauses in the Energy Retail Code and Electricity Distribution Code to:

- Require that where a remote connection, disconnection or reconnection is to be carried out, that the distributor uses its best endeavours to perform the service within two hours of a valid request from a retailer or customer, and
- Clarify the terms associated with connection and energisation taking into account smart meters to remove any ambiguity

AGL supports no change in the existing service level requirements until the establishment of the National smart metering service levels.

There is significant work being undertaken at the NSMP in relation to the assessment and establishment of Performance levels and Service Levels related to smart meters.

AGL believes that national consistency in service level obligations is imperative for smart meter services which include remote re-energisation and de-energisation. We note that retailers do not have a mechanism to identify meters with remote capability, specifically remote capability for re-energisation and de-energisation, nor is there the ability to request a distributor to perform a remote service in Victoria therefore making any introduction of higher service levels of limited value. To date, no new Business to Business protocols or service level standards have been introduced in Victoria to support remote de-

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energisation and re-energisation. There is also the outstanding safety review being conducted by Energy Safe Victoria surrounding these services.

AGL is concerned that Victoria is proposing to define remote connection and disconnection in a way that is inconsistent with national proposals. We believe that it will be more appropriate for Victoria to adopt the national scheme.

## 6.2 Customer protection under disconnection

### Draft Decision

- Clause 13.1 of the Energy Retail Code will be amended to require retailers to state on all disconnection warnings that the disconnection could occur remotely.
- Clause 13.2 of the Energy Retail Code will be amended so that, when customers covered by this clause are to be disconnected remotely, retailers must contact the customer in person or by telephone, or in extenuating circumstances, by mail. This communication must set out all of the options for the customer.

AGL supports the amendment to clause 13.1 of the ERC requiring all disconnection warnings to state that the disconnection could occur remotely.

AGL recommends that clause 13.2 remains unchanged. The suggested change ignores the premise of hardship programs which are designed to prevent customers in hardship from being subject to disconnection (remote or manual) procedures. In the event that a customer is not on the program then current regulations prescribe the endeavours required, including the assessment for hardship, and therefore make the suggested change confusing at best, if not redundant.

## 6.3 Information to new customers after remote disconnection

### Draft Decision

Clause 9.1.13 of the Electricity Distribution Code will be amended to require distributors to include a sticker on all smart meters installed in customers' premises from 1 January 2011. This sticker must include the relevant distributor's call centre number advising customers to contact this number if their premises are disconnected.

Customers should be informed of their options with respect to choosing a retailer for the purpose of connection. It is our view that placing a distributor's number on all smart meters may confuse customers as to who they should contact to facilitate the connection of electricity at their property.

In addition, industry has recently implemented a number of initiatives to promote the understanding of the differences between the responsibilities of distributors and retailer for connections and disconnections that may be undone by the proposed approach.

An alternative approach that the Commission may wish to consider is to provide the details of its YourChoice service to the customers. The Commission currently lists all retailers and

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their contact details on the YourChoice website. We see a more approach is for the Commission to place a sticker with the YourChoice website and telephone number next to the meter.

If the Commission's current approach is adopted we suggest the introduction of monitoring and auditing of the distributors to ensure they are impartial when directing customers to a retailer to facilitate a connection.

## 7 | FREQUENCY OF NETWORK BILLING OF RETAILERS BY DISTRIBUTORS

### Draft Decision

The default Use of System Agreement (UoSA) will be amended to enable the distributors to issue monthly bills to the retailers, but retain the payment terms associated with the customer's current billing cycles.

Clause 7.8(a) of the UoSA will be repealed and replaced with the following:

"Subject to clause 7.9, a party must pay the amount specified in each invoice rendered to it in accordance with this agreement to the other party within the following number of business days after the day on which the invoice is received (or deemed to be received) by the first party:

- To the extent that the invoice relates to Supply Points with a remotely read internal meter [which has been installed after 28 August 2007] and the billing period relates to a period before 1 January 2012 – within # business Days;
- Otherwise – within 10 Business Days

Appendix Item 3 (Frequency of meter reads) will be amended to read:

"For all Supply Points connect to the Distribution System and having a remotely read internal meter – monthly.

For all other Supply Points - once every 3 months or as otherwise reasonably determined by the Distributor".

The amendments to the default Use of System Agreement will take effect from 1 October 2010, to support the distributors' commercial arrangements with the retailers.

AGL notes that the draft report has inadvertently referred to a 'remotely read internal meter' rather than a 'remotely read interval meter'.

We acknowledge that the Commission has reviewed the UoSA however we are concerned that the proposal of the Draft Decision does not cover all the components to ensure a neutral outcome.

It is AGL's view that to ensure a cost neutral position for retailers and distributors the following (5) changes need to be reflected within the UoSA and cannot be separated:

- 1) Payment terms to be extended to be 36 business days from receipt of invoice.
- 2) Inclusion of clause to ensure distributors will issue the AMI invoice 'not before the 8th Business day of the month'
- 3) Inclusion of reference that the AMI invoice will only include usage for the previous calendar month



- 4) On the earlier of 1 Jan 2012 or when the regulatory framework is amended to allow monthly billing, billing and payment terms for AMI meters will revert to those defined by the default UoSA agreement.
- 5) 12 business days be allowed to dispute an invoice

We note that item (4) has been considered within the Draft Decision.

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