

27 March 2020

Ms Sarah McDowell
Director, Energy
Essential Services Commission
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Dear Sarah,

Changing the back-billing rules for retail energy customers

AusNet Services is pleased to have the opportunity to make this submission in response to the Essential Services Commission's draft decision on changing the back-billing rules to better protect domestic customers and small businesses.

We recognise the proposed change aligns to the Victorian Government's November 2018 Energy Fairness Plan, which includes a decision to reduce the allowable back billing period from nine to four months to better protect Victorian customers. The draft decision and proposed changes would provide customers with greater protections from unexpected back billing. These changes also create greater incentives on retailers and distribution network businesses to accurately collect meter reads and identify any discrepancies early.

With an effectively complete roll out of remotely read smart meters, Victoria is well placed to limit back billing to 4 months. In addition, typically more than 96% gas meters for domestic customers and small businesses are read every two months. Some of the 4% of actual reads that are not carried out every 2 months are due to factors such as locked gates.

We would welcome the opportunity to discuss this matter further with the staff at the Essential Services Commission prior to the final decision if there are to be changes from the draft amendments, such as an earlier implementation date.

If you have any queries about any of the positions outlined in this submission, please do not hesitate to contact [REDACTED] on [REDACTED].

Yours sincerely,

[REDACTED]

[REDACTED]

Manager Economic Regulation