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4 February 2011

Regulatory Review – Smart Meters
Essential Services Commission
Level 2, 35 Spring Street
MELBOURNE VIC 3000

By Email: smartmeters@esc.vic.gov.au

Smart Meters Regulatory Review – Capacity control and verifying bills

Country Energy welcomes the opportunity to respond to the Essential Services Commission issues paper on capacity controls and verifying bills.

The focus of this submission is on section 3.2 of the Issue of “Start readings on smart meter bills” where the ESC has sought comment on the desirability and practicality of including the consumption reading corresponding to the start of the billing period.

As the Essential Services Commission (ESC) is aware, the NSW Government is in the process of completing the sale of the retail arm of Country Energy to Origin Energy. It is important to note that Transitional Service Arrangements will be in place during the transition to the new owner.

Country Energy’s billing system is currently set up to process cumulative manual readings or interval readings. To provide the start index reading on the customers account would require significant system and billing changes for Country Energy.

Country Energy is of the view that to make changes to these systems in the middle of a retail reform process would not be cost effective for the customer or the energy industry. Therefore Country Energy respectfully requests a temporary exemption from this element of the regulatory changes until transition arrangements have been completed so that customers do not face duplication of implementation costs.

If you have any questions in relation to this submission, please contact Gerard Lang on 02 6338 3410.

Yours sincerely



John Adams
Executive General Manager Retail