

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted online

27 April 2015

Dear Mr Pierce,

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Re Expanding Competition in Metering and Related Services Draft Rule Determination “ERC0169”

Thank you for the opportunity to comment on the Draft Rule Determination for Expanding Competition in Metering and Related Services. As the peak body for the community services sector in South Australia, SACOSS has a long-standing interest in the delivery of essential services. Our research shows that the cost of basic necessities like electricity impacts greatly and disproportionately on vulnerable and disadvantaged people. Our advocacy is informed by our members; organisations and individuals who witness these impacts in our community.

SACOSS made a submission on the first round of consultations for this project. Our submission noted our concern that a number of processes were underway which treated metering and related services but these were not necessarily being coordinated. Having now participated in the SAPN Regulatory Determination processes being conducted by the AER, SACOSS is aware of the extent of coordination between the AEMC and AER on metering issues. SACOSS welcomes this coordination.

SACOSS supports the changes in the Draft Determination which will lead to a market led approach to the deployment of advanced meters. In particular, SACOSS welcomes the provisions made in the Draft Determination for access to meters by authorised parties only and opt out arrangements. SACOSS also supports the AER having jurisdiction for the unbundling of distribution use of system charges issue.

We thank you in advance for your consideration of our comments. If you have any questions relating to the above, please contact SACOSS Senior Policy Officer, Jo De Silva on 8305 4211 or via jo@sacoss.org.au.

Yours sincerely,



Ross Womersley
Executive Director