

Friday, 19 January 2024

Kris Funston  
Executive General Manager  
Australian Energy Regulator  
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By email: [AERResets2024-29@aer.gov.au](mailto:AERResets2024-29@aer.gov.au), [REDACTED]  
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Dear Kris,

**Subject: Stakeholders submission in relation to the Australian Energy Regulator's Draft Decision for Power Water Corporation's 2024-29 regulatory proposal**

Rimfire Energy ("Rimfire") welcomes the opportunity to provide its submission to:

- the Australian Energy Regulator ("AER") regarding Power Water Corporation's ("PWC") Revised Regulatory Proposal dated 30 November 2023 in Response to the AER's Draft Decision in relation to the 2024-29 Determination;
- PWC as a further submission to Rimfire's submission to PWC regarding its Draft Plan for the 2024-29 regulatory proposal submission to the Australian Energy Regulator; and
- The Australian Energy Market Commission ("AEMC") regarding its Final Report on Review of the Regulatory Framework for Metering Services dated 30 August 2023.

Topic: ***Smart meter roll-out program to support customer power of choice***

The Northern Territory (NT) electricity market remains dominated by NT Government Owned Corporations across the key industry sectors of generation, networks and retail. Rimfire has had a retail licence since 2015 and remains the only active non-government participant in the retail market. It is widely acknowledged that smart meter installation rates in the NT remains a barrier to the power of choice for consumers in the NT.

In November 2023, the NT Government sought feedback from Rimfire on its intention to extend the non-contestable provision of metering services by PWC in the NT for the full term of the next regulatory period 2024-29. Due to metering remaining a significant barrier to competition in the NT, Rimfire does not support this extension.

Rimfire does welcome PWC's Revised Regulatory Proposal that is in line with the AER's recommendation and feedback from customers and stakeholders, and in particular the proposed revised capex forecast to maintain installation rates of smart meters (~11,000 per annum) with a view to complete the smart meter replacement program by the end of the 2024-29 regulatory period.

Rimfire notes however, that PWC's current smart meter roll-out program does not take customer choice into consideration as part of the scheduling of smart meter installations, nor is there adequate visibility provided to retailers of the schedule of smart meter installations being undertaken; thereby foregoing many of the benefits of a smart meter fleet due to customers and retailers not being readily informed of smart meter upgrades.

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Rimfire requests PWC, with support from the AER, and the AEMC consider adjustments to the current smart meter roll-out program that support customer power of choice and improve competition in the NT retail electricity market. In particular, Rimfire proposes:

- flexible arrangements implemented to allow customers' requesting a smart meter replacement to be prioritised in the schedule of smart meter installations; and
- timely and sufficiently detailed notifications provided to customers and retailers of the planned schedule for upcoming and recently completed smart meter installations.

Rimfire appreciates the opportunity to provide this submission for consideration, and thanks PWC, the AER, and the AEMC for providing the necessary consultation sessions to facilitate quality discussions on the next regulatory period and the future of the NT networks.

**Allen Duffell**

General Manager - Retail

Rimfire Energy Pty Ltd

