

Monday, 13 November 2023

Kris Funston  
Executive General Manager  
Australian Energy Regulator  
GPO Box 1313  
Canberra ACT 2601

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") Draft Plan for the 2024-29 regulatory proposal submission to the AER.

Comments on key questions for stakeholders:


Topic: Chapter One – Powering the NT

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.

Rimfire notes that although NT consumers have been considered 'contestable' since 2010, according to PWC's January 2023 metering report, approximately 60% of NT consumers have only a basic meter installed at their premise and are therefore not actually eligible to transfer to another retailer without a meter upgrade cost of somewhere between \$350 - \$1,500 depending on the premise's electrical connection point technical characteristics. This remains the most significant barrier to customer choice in the NT electricity market.

Whilst ever metering is not contestable in the NT and until the meter roll-out is completed, the NT market should not be considered truly contestable, and the proposed meter roll-out program being undertaken across two (2) further regulatory periods should be considered unnecessarily protracted. Therefore, Rimfire is strongly supportive of efforts to fast track the interval meter roll-out program so that the benefits of smart meters can be realised by all consumers within the NT.

Rimfire appreciates the opportunity to provide feedback to the AER on PWC's Draft Plan for the 2024-29 regulatory proposal.

Allan Duffell   
General Manager -Retail  
Rimfire Energy Pty Ltd

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