

Our Ref: EWOQ/18/0002

15 January 2018

Mr Chris Pattas  
General Manager, Networks  
Australian Energy Regulator  
PO Box 520  
Melbourne VICTORIA 3001  
Email – [AERinquiry@aer.gov.au](mailto:AERinquiry@aer.gov.au) (Submission – network exemption guideline review)

Dear Mr Pattas

**Re: Issues paper – Draft Amendments to the Electricity Network Service Provider Registration Exemption Guidelines, November 2017**

Thank you for the opportunity to make a submission on the *Australian Energy Regulator's Electricity Network Service Provider Registration Exemption Guidelines*.

The Energy and Water Ombudsman Queensland (EWOQ), as a member of Australia and New Zealand Energy and Water Ombudsman Scheme Network (ANZEWO), supports the principles of the ANZEWO group in ensuring customers of exempt networks have access to dispute resolution services as provided to other residential electricity customers.

Upon review of the Guidelines and Amendments, I confirm that EWOQ supports the General Conditions outlined in 4.1 of the Draft NSP Registration Exemption Guidelines.

In response to the four consultation questions on page 25 of the Issues Paper, we advise as follows:

**Question 1 and 2** - EWOQ does not have comments regarding these questions, as they relate to transmission and generation issues respectively, which are outside the jurisdiction of EWOQ.

**Question 3** - EWOQ supports the concept that more frequent meter readings may assist some customers with their budgeting requirements. This should however be viewed in the context of an increased frequency of meter reads may attract a charge for these meter reads.

This may impose a financial strain on those customers who seek to have an increased frequency of meter read and billing for budgeting purposes versus being charged for more frequent meter reads.

EWOQ also notes that with the introduction of advanced metering technology, an actual meter read would attract a charge only when a customer requests a physical meter read and the read is subsequently performed by the physical read of the meter.

**Question 4** – We have no further comments to make on any other proposed amendments.

We may seek further advice or information in relation to jurisdiction on specific issues when they come to hand in the future.

Should you require further information, please contact Mr Gary Sacre on (07) 3087 9401.

Yours sincerely



**Jane Pires**

Energy and Water Ombudsman