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## **Response to AER Consultation: Interval Meter Reassignment Requirements**

ENERGETEX Limited (ENERGETEX) welcomes the opportunity to provide comment on the Australian Energy Regulator's (AER) *Interval Meter Reassignment Requirements: Draft Decision*, setting out the notification requirements that will apply to distributors before they reassign a customer to a time of use (TOU) network tariff following installation of an Advanced Metering Infrastructure (AMI) meter.

While ENERGETEX recognises that the Interval Meter Reassignment Requirements (IMRR) is intended to initially apply to the AMI roll-out in Victoria, the following comments are made in recognition of potential for the IMRR to have broader future application (as a whole or in part) at either a national or jurisdictional level.

As a general comment, ENERGETEX believes that unless 'time based' network tariffs are reflected through to customers, the benefits and stated objectives of the AMI roll-out will be difficult to achieve.

On the specific issue of information provision, ENERGETEX supports the AER's view that distributors have a relationship with customers and believes that the IMRR should:

- Require retailers to convey information regarding the impact of network tariff reassignment in the context of the customer's retail offering; or alternatively
- Allow distributors the discretion to communicate directly with customers regarding their tariff reassignment.

The provision of this information would assist customers to understand the pricing implications of the tariff reassignment, behavioural changes to maximise their TOU response, and the value of seeking alternative retail offerings in the market (whether TOU or single rate).

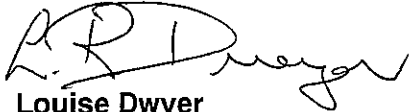
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Consistent with this, ENERGEX believes that retailers should be required to advise customers whether they intend to apply the TOU network tariff (in whole or in part) to the customer through their retail price structure.

Please do not hesitate to contact me should you wish to discuss this submission.

A handwritten signature in black ink, appearing to read "L. Dwyer".

**Louise Dwyer**  
**Group Mgr Regulatory Affairs**