



St Vincent de Paul Society
VICTORIA

good works

8 September 2009

Mr Chris Pattas
General Manager
Network Regulation South Branch
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3000

Via email to: aer inquiry@aer.gov.au

Dear Mr Pattas,

We welcome the opportunity to respond to the Australian Energy Regulator's (AER) Draft Determination on the Victorian advanced metering infrastructure (AMI) Review: 2009-11 AMI budget and charges applications.

Please find attached a report by the St Vincent de Paul Society titled 'Customer Protections and Smart Meters – Issues for Victoria'. This report forms part of our submission to the AER's Draft Determination on initial budgets and charges applications in regards to the Victorian AMI cost recovery process.

The attached report details several issues we believe the AER should consider in regards to this review. In particular we wish to draw your attention to Chapter three of the report (titled 'Economic Regulation' pp 41-44). In this section of the report we recommend that:

- the AER considers equitable allocation of AMI costs;
- the AMI related costs must be itemised on customer bills;

- the AER implements a process of timely review and pass back of benefits to consumers; and
- the AER reviews the scope and nature of excluded service charges in light of the AMI roll out.

In addition to the recommendations pertaining to the cost recovery process, we would like to draw your attention to other recommendations made in this report relevant to the AER. The following recommendations pertain to future issues that we believe will arise from the activation of the functionalities associated with AMI.

Recommendation 11 in regards to pricing information guidelines (p 25)

Recommendations 17 and 18 in regards to the development of substituted data guidelines and Direct Load Control product requirements (p 27)

Recommendation 19 in regards to the development of guidelines for data processing and meter accuracy testing (p 29)

Recommendation 36 in regards to the development of a comprehensive one-stop shop for consumer information (p 39)

We would welcome the opportunity to discuss these matters with you at a time of your convenience.

Yours Sincerely

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St Vincent de Paul Society
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Attachments 2:
Customer Protections and Smart Meters – Issues for Victoria
Background Paper – Customer Protections and Smart Meters