

4 September 2009

Queensland Competition Authority
GPO Box 2257
Brisbane QLD 4001

Dear Sir/Madam,

AGL Energy Limited (**AGL**) welcomes the opportunity to comment on the interim consultation notice (**notice**) for reporting requirements and restriction on special meter reads published by the Queensland Competition Authority (**QCA**).

Increased Reporting Requirements

AGL does not support the suggested increase in the regulatory burden with regard to regulatory reporting requirements as outlined in section two of the notice. AGL has not responded to the individual code changes proposed in the notice, but provides the following general comments.

AGL understands that the retailer reporting requirements under the National Energy Customer Framework (**NECF**) will be intended to replace existing state-based regimes. AGL does not support any increase in reporting requirements by individual jurisdictions ahead of the implementation of the AER Compliance Procedures and Guidelines under the NECF.

Changes to the frequency and scope of reporting requirements would incur system and process changes which would therefore impose significant costs upon retailers. Combined with the likely changes to reporting requirements under the NECF, the cost burden on retailers to implement two new reporting regimes in a short period of time would be impractical.

Restriction on Special Meter Reads

AGL supports terminating the current restriction on special meter readings for *in situ* transfers, bringing Queensland regulations into line with New South Wales, Victoria and South Australia.

AGL supports the intention to require explicit customer consent to ensure that customers are fully informed of their options, including incurring a special meter reading fee. However, the existing obligations under clause 6.3 of the code already require *explicit informed consent* to initiate a transfer, which necessitates that the retail entity has fully and adequately disclosed all matters relevant to that customer. This disclosure encompasses all costs that the customer would incur including the special meter reading fee. AGL therefore considers that changes to the Electricity Code are not required.

As a minimum, customer consent should not be required if a special meter reading fee is not passed through to that particular customer.

Please contact Nicole Wallis, Manager Retail Markets Regulation on (03) 8633 7440 if you have any questions in relation to this submission.

Yours sincerely,



Alex Cruickshank,
Head of Energy Regulation



- > Being Australia's largest private owner and operator of renewable energy assets
- > Gaining accreditation under the National GreenPower Accreditation Program for AGL Green Energy®, AGL Green Living® and AGL Green Spirit
- > Being selected as a constituent of the FTSE4Good Index Series