



AGL Energy Limited

T 02 9921 2999

F 02 9921 2552

[agl.com.au](https://www.agl.com.au)

ABN: 74 115 061 375

Level 24, 200 George St

Sydney NSW 2000

Locked Bag 1837

St Leonards NSW 2065

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Essential Services Commission of South Australia

GPO Box 2605

Adelaide SA 5001

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Gas Metering Code Draft

AGL Energy (AGL) welcomes the opportunity to provide feedback to the Essential Services Commission of South Australia (the Commission) on the draft Gas Metering Code.

AGL is a leading integrated essential service provider, delivering 4.3 million gas, electricity, and telecommunications services to our residential, small, and large business, and wholesale customers across Australia. AGL retails gas to over 1.5 million customers across all mainland Australian states, including approximately 143,000 gas customers in South Australia.¹ As AGL continues to support and expand decarbonisation and electrification opportunities for its customers, it also remains a critical priority for AGL to deliver secure, reliable, and affordable energy options to its existing customers.

AGL supports the Essential Services Commission's (the Commission) review of the regulatory instruments that apply to Australian Gas Networks (AGN). Below, AGL puts forward a number of recommendations in relation to the Gas Metering Code draft for the Commission's consideration.

Section	Requirement	AGL Comment
Definitions	<i>Meter Reading Schedule:</i> meter reading schedule means a schedule provided by a distributor to a retailer under clause 3.1.1(a) of the retail market procedures as amended from time to time	Amend the proposed definition to explicitly reference the reading of a meter and replace reference to 'retailer' in the definition with 'User' to align terminology to the Retail Market Procedures: "means a schedule to read a meter which is provided by a distributor to a User under clause 3.1.1(a) of the retail market procedures as amended from time to time".
1.4	<i>Application of the Gas Metering Code</i>	The provisions relating to "persons bound by this industry code" under section 1.4.2(a)-(b) apply to distributors and retailers only which could create a potential gap for self-contracting users.
2.1	<i>Obligation to Install Meters</i>	While we appreciate that we may not need interval meters for smaller customers, there may be benefits in obtaining

¹ [AGL ESG Data Centre FY24](#): 143,282 gas customers in South Australia as at 30 June 2024, including residential, small business, and commercial and industrial customers.



interval gas meter data for small customers where gases, other than natural gas are in use, to better understand gas flows and changes in heating values.

Further, some customers are seeking monthly gas bills to better manage their energy usage.

As such, AGL suggests that the metering code specifically allows for 'smart' gas meters to be able to collect data at intervals other than 3 monthly.

This amendment would allow more flexibility for networks and retailers to support gas flows for non-natural gas and consumer requests.

2.1.4	<i>Obligation for distributor to provide 15 business days' notice</i> when installing a different metering installing than required by the applicable regulatory instruments or ordinarily installed.	<p>AGL questions whether 15 business days' notice is excessive in situations where the meter is being replaced pursuant to a customer request, or an emergency/fault with the meter.</p> <p>AGL considers that a faulted accumulation meter may be suitably replaced with a 'smart' gas meter but does not support a 15-business day wait, especially if the customer is either using unmetered supply or has no supply.</p> <p>AGL recommends that these should obligations apply when the meter exchange takes place following planned works, e.g. meter upgrade and meter replacement, as opposed to unplanned works such as a meter fault or customer request.</p>
2.5.4	The distributor must provide information about the installation database within 2 business days of a request being made in writing.	<p>While AGL agrees that the 2-business day timeframe for provision of information is suitable for transactional or routine requests, 5 business days would be more appropriate where non-standard requests are made, for example, a query or a request which involves analysis.</p>
4.4	<i>Validation, estimation and substitution of metering data</i>	<p>AGL notes that the obligations for validation, estimation and substitution seem to revolve around metering data, but it is unclear if these obligations are also required for managing Heating Values, which is a key component to energy calculations, and has become more important given the inclusion of other gases, and distribution connected facilities.</p> <p>Several jurisdictions, including South Australia, currently do not have a process for managing heating values which we consider to be a major gap.</p>



4.4 *Validation, estimation and substitution of metering data*

When meter data is substituted there seems to be no obligation for distributors to make reasonable endeavours to collect the actual meter data (where available – e.g. telemetered sites) and provide an update within a reasonable period.

4.5.2 *Estimation of metering data:* If the distributor calculates an estimated meter reading, the distributor must inform the retailer.

AGL proposes that the Distributor should not only inform the retailer of the Estimation, but also the Substitution as well as the reason (enumerated in the procedures) to explain why the data was replaced.

AGL also notes that in general the Quality of data should be provided with the data (Actual Estimated, Substituted Final Substituted) as well as any reason for the data not being actual data, so that the retailer can manage customer expectations.

General

There seems to be no instrument which provides monitoring of a networks volume of actual / no actual meter reads across a year, or the number of sites where there is Chronic no access.

AGL would strongly support some of the monitoring reports and data metrics being made available to retailers relating to performance in meter reading.

If you would like to discuss any aspect of AGL's submission, please contact Valeriya Kalpakidis at vkalpakidis@agl.com.au.

Yours sincerely,

A handwritten signature in black ink that reads 'Liam Jones'.

Liam Jones

Senior Manager Policy and Market Regulation

AGL Energy