

14 October 2019

Slavko Jovanski
Australian Energy Regulator
Level 17, Casselden, 2 Lonsdale Street
Melbourne VIC 3000

Energy Networks Australia's supports broad industry consultation on unsuccessful network disconnection requests

Dear Mr Jovanski

Energy Networks Australia welcomes the opportunity to provide this submission regarding Jemena's Access Arrangement proposal for its gas distribution network for 2020 – 2025.

Energy Networks Australia is the national industry body representing businesses operating Australia's electricity transmission and distribution and gas distribution networks, with 21 member companies providing more than 16 million electricity and gas connections to almost every home and business across Australia.

We understand that network businesses may sometimes have difficulties to disconnect customers when requested by retailers. This reflects a number of situations including meters being located behind locked gates, customers refusing access, customer details not being provided by retailers, presence of animals, customer threats, or others. Typically, retailers request disconnection in response to customers refusing to pay for their energy consumption, a situation which is sometimes exacerbated by the customer failing to meet their obligation under NECF to establish a supply contract with a retailer for their premises.

We note that as part of the review of Jemena's Access Arrangement proposal, several retailers have made submissions about the consequences of Jemena's inability to disconnect customers. It is likely that whatever the AER determines in relation to Jemena's Access Arrangement proposal will become the new "standard". As this is a complex issue involving industry participants in numerous jurisdictions, it does not seem appropriate for this issue to be resolved through an individual access arrangement process for one gas network. The broader industry – including networks and retailers - should be engaged to develop an appropriate solution to this issue, including the underlying issue of customers refusing to pay for energy

If you have any other queries, please contact Dr Dennis R Van Puyvelde, Head of Gas on:
dvanpuyvelde@energynetworks.com.au or 02 6272 1548.

Yours sincerely,



Andrew Dillon

CEO