

20 September 2018

Mr. John Pierce
Chair
Australian Energy Market Commission
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Sydney South NSW 1235

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By online submission

Dear Mr Pierce

Estimated Meter Reads – AEMO Submission

AEMO welcomes the opportunity to provide input to the Commission's Draft Determination on the Rule Change Proposal related to Estimated Meter Reads.

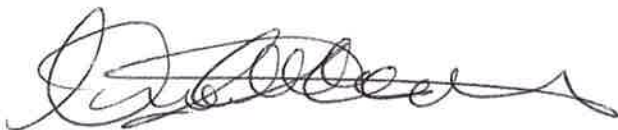
AEMO is the independent National Electricity Market (NEM) and Western Australian Wholesale Electricity Market (WEM) market and systems operator, and the NEM National Electricity Transmission Planner. This role is undertaken within the legislated policy and market frameworks of the day and in adherence to the National Gas and Electricity Objectives and Rules.

AEMO is tasked with the development and maintenance of the Metrology Procedures in the National Electricity Rules (Rules), which includes technical specifications for metering installations and metering devices. In this context, AEMO understands the associated technical requirements required to support this Rule change proposal.

AEMO's submission provides views on the requirements for Metering Coordinators to provide the ability for customers to visually access meter readings when a modern advanced metering device has been installed at their connection point.

For further information on the AEMO submission, please do not hesitate to contact me or Lee Brown on (03) 9609 8528.

Yours sincerely



Violette Mouchaileh
Acting Executive General Manager, Markets

Customer Self Reads – meter registers and visible displays

AEMO supports the changes outlined in the draft Rule which enable customers to request an adjusted bill based on an estimate, by providing the retailer with a reading of their meter.

For the rule to be effective, meters must display sufficient information to enable meter readings to be taken.

Clause 7.8.2(a)(1) of the Rules specifies the current requirements for the display of energy data at the meter:

7.8.2 Metering installation components

- (a) *A Metering Provider must, in accordance with the Rules and procedures authorised under the Rules, ensure that a metering installation (other than a type 7 metering installation) :*
- (1) *contains a device that has either a visible or an equivalently accessible display of the cumulative total energy measured by that metering installation (at a minimum);*

This clause provides assurance that the visible display of a meter must at a minimum enable a reading of the cumulative total energy measured by that metering installation. However, many small customers in the NEM have metering configurations that record more than one data register. For example, a small customer whose metering installation configuration includes the connection of load and generation (such as a solar photo-voltaic system), and has a peak and off-peak tariff, will typically be billed according to the data assigned to four independent registers, with the total cumulative energy register not featuring on the customer's bill.

If a modern small customer metering installation is programmed to only display the cumulative total energy measured, the customer would be unable to take a reading for each register and would therefore be unable to access the benefits proposed by the draft Rule.

AEMO considers that the current requirements for the visible display of data should be expanded in order that all small customer metering installations are required to contain a device that has a visible display of the total cumulative energy for each recorded channel of interval data. AEMO considers that this requirement should be included in the minimum services specification (Schedule 7.5 of the Rules) rather than amending clause 7.8.2 of the Rules, as this expanded requirement would only be applicable for small customer metering installations – the beneficiaries of the draft Rule. The AEMC may also consider that the matter is sufficiently technical that it can be considered further in procedures by AEMO in accordance with clause 7.8.3(b) of the Rules.

AEMO note that all Victorian smart metering installations are already required to display the cumulative energy of each recorded channel of interval data¹.

Using the example provided previously, where the customer is billed based on four readings at the one metering installation, the following table provides an overview of the current Rule requirements for the meter display, the requirements for the meter display proposed by AEMO in this submission and the readings provided on the customer's bill:

	Total cumulative energy	Register 1 Total Load (peak)	Register 1 Total Load (off-peak)	Register 1 Total Generation (peak)	Register 1 Total Generation (off-peak)
Current Rule requirements (Meter Display)	✓	✗	✗	✗	✗
AEMO proposal (Meter Display)	✓	✓	✓	✓	✓
Customers bill	✗	✓	✓	✓	✓

AEMO has a good working knowledge of the metering equipment and systems used by Metering Coordinators responsible for small customer metering installations in the NEM and considers that all small customer metering installations can meet the requirements for meter display proposed in this submission. As previously mentioned, this is a current requirement for Victorian AMI metering installations and is commonplace for metering installations in overseas markets where smart metering is deployed, including the UK and New Zealand.

It is possible that some Metering Coordinators are already providing this facility and would not need to make changes to installed or new meters to comply with the proposal. If a Metering Coordinator has not provided this facility in any installed meters, meter displays can be reconfigured remotely where the metering installation has remote communications established.

¹ Clause 3.2(a)(3) of the Minimum AMI Functional Specification (Victoria) release 1.2, September 2013, and 4.3 Item 1 of the Minimum AMI Service Levels Specification (Victoria) release 1.1, September 2008.