

26 October 2018

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Reference code: ERC0236

Dear Mr Chan,

### **Draft rule determination on metering installation timeframes**

The metering installation timeframes draft rule proposes to address immediate issues that are impacting customers in jurisdictions where contestability for smart metering is now a reality. In Victoria, Distribution Networks Service Providers (DNSPs) are currently the exclusive provider of smart metering for small customers.

AusNet Services, as the DNSP for customers in the north and east of Victoria, is providing smart metering services to over 700,000 small customers. The metering services we provide for every small customer include:

- the provision of interval metering data to retailers by 6:00 AM and to customers on request;
- voltage monitoring to increase the utilisation of locally generated renewable energy; and
- a range of safety monitoring capabilities reducing the numbers of electrical shocks and bushfire ignition events.

The contestable smart metering framework, subject to further reforms to lift minimum standards, has the potential to deliver these same benefits across the National Electricity Market and not just Victoria.

AusNet Services supports changes to the national electricity rules (NER) that would mandate the minimum timeframes for the installation of a smart metering within:

- 6 business days after new connection is requested;
- 15 business days after a *basic* connection alteration is requested; and
- 15 business days after a meter fault is identified.

It is our experience these targets are achievable, even in remote rural areas. We maintain a 24/7 field force and contract centre, and no customer was left off supply due to a meter fault during our smart meter rollout.

However, the proposed draft rule change in respect to NER clause 7.8.10C(a) is not consistent with obligations on DNSPs in chapter 5A of the NER in situations where the supply alteration required is not a basic or standard connection service provided within 10 business days. In rural areas, the power lines along a street often only convey single-phase low voltage electricity. In such cases, where a customer requires a supply alteration to a three-phase connection, the connection would involve a transformer replacement and new power lines. The current timeframe for providing this more extensive service is longer than 15 business days and subject to the negotiating timeframe of 65 business days in NER clause 5A.F.4. The proposed 15 business day timeframe is not achievable where such substantive works are required.

In the interests of retaining the effectiveness of the customer protections sort by the rule change for the majority of customers, we recommend changes to NER clause 7.8.10C(a) to limit its application to basic connection services.

7.8.10C(a)(2) where a *Distribution Network Service Provider* is providing a **basic connection service for** the connection alteration, it must co-ordinate the *connection alteration*, with the *retailer* and other relevant parties, in order to allow the *retailer* to comply with its obligation under subparagraph (a)(1).

Similar changes are required for NER clause 7.8.10C(c)(2) to avoid inconsistencies with chapter 5A of the NER.

Other than these recommended changes, we are supportive of the draft rule mandating minimum timeframes for the installation of a smart metering and improving outcomes for customers outside of Victoria.

If you have any queries on our submission, please do not hesitate to contact Justin Betlehem on 03 9695 6288.

Yours sincerely,

A handwritten signature in black ink that reads "C. Eddy". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Charlotte Eddy  
**Manager Economic Regulation**