



25 October 2018

Jenessa Rabone
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Jenessa

Re: METERING INSTALLATION TIMEFRAMES DRAFT DECISION - ERC0236

CitiPower, Powercor and United Energy welcome the opportunity to respond to Australian Energy Market Commission's (AEMC) draft determination on metering installation timeframes.

Distributors should be able to undertake their usual practices to restore supply in case of a faulty meter

The draft determination proposes that in rare cases where a customer has experienced a loss of supply as a result of a faulty meter the meter can be bridged (or by-passed) by the local distributor to restore supply until the meter is repaired or replaced. Bridging the meter utilises the faulty meter when restoring supply, while by-passing the meter requires the installation of a 'connector' device that allows supply to be restored without a meter.

We consider both practices to be unsafe with digital electronic meters and do not bridge or by-pass meters as part of our operations. Bridging can leave the meter energised exposing by-standers to injury or property to fire damage. In by-passing, the use of connectors may leave exposed live parts or lead to incorrect wiring (known as 'reverse polarity') deeming it as an unsafe installation.

In the case of a network fault, when there is an injection of high-voltage electricity into the low-voltage network the injection damages the digital electronic meter which stops electricity supply to the customer. The digital electronic meter can similarly be damaged by a near-by lightning strike or excessive fault current passing through from the customer side. In these cases, the only safe way to restore supply to the customer is to replace the meter with either a new meter or a similar network device.

As there are distributors that do not bridge or by-pass meters, the AEMC should specify in the final determination that in "rare cases where a customer has experienced a loss of electricity as a result of a faulty meter, the local distributor should undertake its usual practices to maintain supply until it is repaired or replaced".

Should you have any queries about this letter please do not hesitate to contact Sonja Lekovic on (03) 9683 4784 or slekovic@powercor.com.au.

Yours sincerely,

Brent Cleeve
Head of Regulation, CitiPower, Powercor and United Energy