

24 October 2018

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Subject: Draft Rule Determination: Metering installation timeframes (Ref. ERC0236).

SA Power Networks welcomes the opportunity to provide a submission regarding the Australian Energy Market Commission's (AEMC) draft determination regarding Metering Installation Timeframes 2018 (Ref. ERC0236).

SA Power Networks is supportive of the draft rule changes that provide customers with greater control and confidence of when their electricity meter will be installed. In particular we support the AEMC in its commitment for Retailers to deliver customer service levels consistent with those previously provided by DNSPs.

The AEMC would be aware of the commitment shown by SA Power Networks since the commencement of metering contestability and our willingness to support Retailers and the industry in finding solutions to the current issues being experienced by customers that require a metering service. SA Power Networks will continue to work collaboratively to ensure that customers receive the required improvements to service levels.

SA Power Networks would like to provide the following points to key aspects of the rule change:

Meter Installation Timeframes

SA Power Networks supports the customer centred principles contained within the rule change for new connections and simple meter exchanges, that in the first instance, the retailer must arrange for the meter to be installed *"on a date agreed with the small customer"*, and in the case of a connection alteration *"on a date agreed with the small customer, and the Distribution Network Service Provider where the Distribution Network Service Provider is providing the connection alteration"*. When agreement cannot be reached then meters must be installed within the set timeframes.

Service Levels

As stated earlier, SA Power Networks is supportive of Retailers being required to deliver customer service levels consistent with those previously provided by DNSPs.

SA Power Networks would not support any proposed relaxation of service levels or the obligations for:

- meter installation timeframes
- timeframes and obligations for rural and remote customers
- obligations for 'retailer planned interruptions'.

Any proposal to provide a lesser standard than was previously provided by DNSPs is not in the best interests of customers.

Retailer and DNSP Communications

SA Power Networks supports the proposed rule that any communications required between the Retailer and the DNSP must be made promptly through the B2B e-Hub or any other agreed method. The use of other agreed methods outside of the B2B e-Hub will be important for Retailers to embrace to ensure achievement of the required customer outcomes. SA Power Networks does not believe that current B2B transactions provide the required interactions between Retailers and DNSP's. The development of any further B2B transactions would take well over 12 months and should only be pursued in the long term if warranted. The industry within SA has used the REX system developed by SA Power Networks for electricians for well over a decade. This provides a central system platform for electricians' new connection and alteration work, including an appointment capability for work delivery and this capability can be leveraged when agreement between Retailers, DNSPs and the small customer is required.

Small customer or their authorised representative

SA Power Networks suggested that the final rules be modified to ensure that authorised representatives (generally the electrician) of the customer is included within Retailer interaction obligations. Customers that require connection related work will engage a qualified electrician to perform any required work and expect this party to organise the related connection and metering service. The rules should make it clear that an authorised representative is able to manage interactions on behalf of the customer and not require further customer contact that is likely to delay the required metering service.

AEMO streamline the appointment process for metering parties

SA Power Networks supports changes that help to streamline the required metering role changes within MSATS, however, any changes should not be treated as minor. Changes should follow the full AEMO development and consultation process to enable industry time to assess the potential impacts and implement any required process and system changes. These changes should not be treated as minor/manifest errors by AEMO which would enable AEMO to shortcut this process. If this was to occur it is likely that participants may not be able to complete the required internal work and therefore be put into a position of non-compliance.

SA Power Networks offers some further detailed comments to the AEMC for consideration as part of their final determination. These comments can be found in appendix A.

Should the AEMC require further clarification of any of our comments, please contact David Woods, Industry and Retailer Relationship Manager, on (08) 8404 9482.

Yours sincerely



Doug Schmidt
General Manager Regulation



Appendix A

NER - Rule Change Clause	NER - Clause Wording	SAPN Comments
New clause 7.8.10C (a)	(2) where a Distribution Network Service Provider is providing 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).	<p>The current wording of the clause is not clear regarding how the coordination of 3 parties (DNSP, Retailer and other relevant parties) would work and who the AEMC considers would be classed as the “other relevant parties”.</p> <p>Did the AEMC intend for this to include the customer/REC? (if so, this is already cover by 7.8.10C (a) (1) (i)) or was this inclusion trying to cover off on the Retailers chosen MC/MP?</p> <p>Given the overall intention of this clause is to allow the Retailer to comply with its obligations under subparagraph (a) (1), SAPN suggested that this clause be limited to the expected relationship and coordination between the DNSP and Retailer. The removal of the “other relevant parties” does not prevent the Retailers MC/MP from involvement in the coordination of the work, but this should be via the Retailers management.</p> <p>Suggest the following wording changes to this clause as follows –</p> <p><i>Where a Distribution Network Service Provider is providing 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).</i></p>
New clause 7.8.10C (b)	<p>The date agreed under subparagraph (a)(1)(i) or the timeframe under subparagraph (a)(1)(ii) (as applicable) will not apply where:</p> <p>(1) the customer has not entered into an agreement with the retailer for the meter to be installed;</p> <p>(2) the proposed site for the meter at the small customer’s premises is not accessible, safe, or ready for the meter to be installed;</p> <p>(3) installing the meter requires interrupting supply to another retail customer; or</p> <p>(4) the small customer has not met the conditions that it is required to comply with under its connection contract.</p>	<p>There is a range of work that SA Power Networks may be required to completed on our infrastructure as part of a customer alteration. This work can range in size and complexity and requires appropriate timeframes to be provided ahead of the completion of metering work to ensure this work is successfully planned and executed.</p> <p>Typical examples of alteration work that requires SA Power Networks to undertake work on the network and would be classed as complex are:</p> <ul style="list-style-type: none"> • Installation of service pole and overhead road crossing • Installation of service pit or pillar • Installation/Upgrade to transformer • Relocation of existing infrastructure (eg relocate pole or pit) • Extension of overhead network <p>This infrastructure work is managed by a dedicated project team within SA Power Networks, including direct consultation with the customer or their agent/electrician regarding deliverable timeframes.</p> <p>Acknowledgement of this work needs to be provided in the rules to ensure that it is clear to customers and retailers when any timeframes for metering work can commence.</p> <p>SA Power Networks suggest that an additional clause be added to the current list of exceptions as follows –</p> <p><i>confirmation from the distributor that any infrastructure work required as part of the alteration has been completed and ready for the meter to be installed</i></p>

NERR - Rule Change Clause	NERR - Clause Wording	SAPN Comments
New clause 59C	[1] Rule 59C Retailer interruption to supply – electricity (SRC and MRC)	The inclusion of new wording/clauses in the NERR, providing Retailers with flexibility to obtain the customer consent to an



	<p>In subrule 59C(1), omit ". " and substitute "by obtaining the affected customer's consent to the interruption occurring on a specified date in accordance with subrule (1A). If the retailer obtains such consent the subrules (2), (3) and (4) regarding planned interruption notices will not apply."</p> <p>[2] Rule 59C Retailer interruption to supply – electricity (SRC and MRC) After subrule 59C(1), insert: (1A) If the retailer and the affected customer reach an agreement pursuant to subrule (1) the record must be retained by the retailer for a period of at least 7 years in a format and including such information to enable the retailer to answer enquiries from the customer relating to the agreement.</p> <p>[3] Rule 59C Retailer interruption to supply – electricity (SRC and MRC) Omit subrule 59C(2) above the note and substitute: (2) If the retailer has not obtained an affected customer's consent to the retailer planned interruption occurring on a specified date in accordance with subrule (1), the retailer must notify the affected customer of the retailer planned interruption by any appropriate means at least 4 business days before the date of the interruption.</p>	<p>interruption and remove the obligation to provide planned interruption notices should be extend to the Distributor. There are a number of single customer interruptions scenarios that the distributor manages and providing this option to proceed with the work on date based on customer consent would provide flexibility and potential benefits to customers. Similar wording changes should be made to - <i>NERR - Division 6 - Distributor interruption to supply, 90 - Distributor planned interruptions.</i></p>
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