

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Sir/Madam,

National Electricity Amendment (Metering Installation Timeframes) Rule 2018 (ERC0236)

The intelliHUB Group welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) consultation paper on the National Electricity Amendment (Metering Installation Timeframes Rule 2018 (ERC0236).

The rule change proposal indicates a change in the connection timeframe obligations placed on Retailers, Metering Coordinators (MC) and Networks for New Connections, Adds & Alts, Asset Replacements and Faults.

Proposed Timeframes for new connections and meter exchanges

intelliHUB Group understands the timeframes proposed for new connections being 6 business days and 15 business days for meter exchanges/alterations.

We expect that there will be a number of exceptions to the above timeline and delays occurring due to scenarios such as:

- No Access to metering installation
- Supply not connected on expected date
- Electrical & other safety constraints, including asbestos, requiring additional works, not able to be completed at appointment time and inclement weather
- Customer refusal at time of metering installation
- Shared Fuse Isolation affecting third party customers
- Customer requesting alternative date for metering installation
- Remote locations of customer sites and potential incidents on route
- Ability to isolate the supply
- Room on the existing switchboard
- Inability to contact the customer

intelliHUB Group would also like the concept of an “MC/MP Planned Interruption” where, for the purposes of installing metering equipment, the MC would be allowed to engage third-party customers that would be affected by the operation of a shared fuse and be allowed to negotiate temporary supply interruptions with the third-party customers whilst on site. The aim of this would be to facilitate more efficient and timely installation of metering equipment, predominantly in multi-occupancy circumstances, by avoiding the extra step of employing a “Network Planned Interruption”.

Timeframes for rectifying a faulty meter

This occurs predominantly in response to the failure of a Type 5 or 6 metering installation where the DNSP raises a Meter Fault & Issue Notification (MFIN) and the time taken for metering coordinators replacing the meter with an advanced meter within a 15-business day window. In one off instances this is generally okay. This timeframe will be near impossible to meet where a DNSP experiences a family failure and there are meter exchanges that need to take place in volume. Having visibility to DNSP’s planned asset and replacement programs can help with the logistics of this to ensure appropriate resources are stationed in the right areas.

Planned outages for metering works

The suggestion of shorter outage notice periods if the customer consents is great. It does not seem to be clear though if that consent can be obtained verbally and by a metering coordinator or their agent. It is not equally clear how this consent is to be obtained. intelliHUB Group would like to understand who can obtain this customer consent and in what form does it need to be.

Streamlining the appointment of metering parties

intelliHUB Group has some concerns that this proposed change has not been volume tested. The scenario put forward has suggested that the current MC being the LNSP objects to another MC being nominated and therefore slowing down the appointment process. This has not been our experience to date, the LNSP rarely objects. This proposal does not allow the newly nominated MC an opportunity to object/decline when incorrectly selected by the FRMP. It is understood that MSATS has a reversal process but this is often very time consuming and can involve numerous phone calls and emails to resolve, adding further delay. This is not considered a small change and would require system logic for a number of MC’s to be reconfigured and therefore if it is insisted on progressing it should follow the full consultation windows and not expedited.

intelliHUB Group would welcome any further discussion in relation to this submission. If you have any questions or wish for further discussion, please contact Robert Lo Giudice on 0419 539 638 or at robert.logiudice@acumenmetering.com.au.

Sincerely,

Peter Birk

Group Chief Operating Officer - intelliHUB Group