

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Sir/Madam,

Draft Rule Determination

National Electricity Amendment (Meter Installation – advanced meter communications) Rule 2019

PLUS ES welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) draft rule change.

The rule change will allow a Metering Coordinator (MC) to deactivate the remote communications capabilities on a type 4 metering installation, converting it to type 4A, following a customer's request.

Deactivation of Remote Access Capabilities

PLUS ES understands there will always be customers, who for various reasons, do not wish to have remote communications capabilities active on their meter. PLUS ES supports the proposed rule change to enable the deactivation of the remote communication capabilities on an existing Type 4 metering installation without requiring a meter exchange. This allows a customer to exercise their right as an electricity customer without the inconvenience of a meter replacement and likely power outage.

The de-activation of the remote access capabilities of a metering installation may be achieved in several ways, each providing different advantages and disadvantages:-

- **Cease Polling / Collection**

The collection of metering data by remote means is easily disabled by de-provisioning the meter and ceasing remote data collection.

Advantages

- De-activation of meter data collection achieved remotely.
- Re-activation of meter data collection achieved remotely.

Disadvantages

- No evidence (locally) that communications have been disabled – Antenna remains in situ.
- Modem continues to be active and connected to the telecommunication network – Not strictly disabled.

- **Remote De-Activation of Comms**

The remote de-activation of communications involves the re-programming of the meter such that it will no longer power or communicate with the modem.

Advantages

- By far the cheapest means to truly de-activate communications.
- De-activation of all communications is achieved remotely

Disadvantages

- Requires a site visit to re-activate communications.
- Requires the meter to be re-programmed locally by a specialist technician.
- No evidence (locally) that communications have been disabled – Antenna remains in situ.

- **Remove Modem**

The current practice for managing customer refusals is to remove the modem at the time of a new meter installation.

Advantages

- Allows 'plug & play' re-activation of communications – Only a modem needs to be installed with existing antenna

Disadvantages

- Requires a site visit to de-activate and re-activate communications.
- No evidence (locally) that communications have been disabled – Antenna remains in situ.

- **Remove Modem & Antenna**

The current practice for managing post installation refusals is to remove the modem and antenna as part of the meter exchange.

Advantages

- Allows 'plug & play' re-activation of communications – Only an antenna needs to be installed with the new modem.
- Provides visual evidence that communications been disabled – Antenna removed.

Disadvantages

- Requires a site visit to de-activate and re-activate communications.
- Requires remediation of meter box for removed antenna.

PLUS ES would like to highlight the statement in AEMC's Information pack with respect to the rule change is not reflective in all scenarios.

'Decrease costs to the individual customer for the provision of a type 4A meter by allowing an installed type 4 meter at a small customer's premises to be converted into a type 4A meter. This has been estimated by the AEC to be three to five times lower than the current process of a meter exchange.'

For the reasons specified above, if all evidence of the communications equipment is to be removed from the metering installation, including the removal of any external antennae and potential remediation of the meter box, then the savings described above will not be realised.

In addition, PLUS ES requests the NER clearly define the term 'deactivation of remote capabilities' or set minimum standards, to avoid any doubt. As PLUS ES has identified a number of ways to achieve the cessation of remote collection of metering data from the metering installation, we would like to see a clarification that the end state of the remote device is expected to be equivalent to a powered off status of the modem.

PLUS ES would like to highlight, whilst deactivation may become a less costly exercise, reactivating the remote capabilities of a Type 4A metering installation will always require a site visit and associated activities, which will incur costs almost comparable to a meter exchange. These costs will be borne by the new customer and/or retailer.

Proposed Clause 7.8.4 (d)

PLUS ES strongly believes the Retailer is the Market Participant who has and owns the

relationship with the small customer; both financial and contractual. For small customer refusal related activities on the meter, the Metering Coordinator will not undertake any activities without the directive of the Retailer. Hence, PLUS ES recommends the rewording and/or amendment of the proposed Clause 7.8.4 (d)(2):-

- Clause 7.8.4 (d)(2) should be re-worded to remove any obligation on the Metering Coordinator to inform the small customer of any upfront or ongoing costs associated with a type 4A metering installation – This should solely be the responsibility of the retailer.
- PLUS ES has no objection to the proposed subparagraph (i), with the understanding that this can only be achieved whilst on site and if the customer is present.
- PLUS ES supports paragraph (3) and recommends:
 - updating Market Systems to enable Participants (current/incoming) to determine that a Type 4A meter is due to a customer refusal; and
 - Enabling B2B mechanisms to communicate customer refusal requests via a standard approach.

Reactivation of Remote Access Capabilities on existing Type 4A

The rule change has not really expanded on the reactivation of remote access capabilities via Clause 7.8.4(i).

PLUS ES recommends the AEMC review and consider including rule changes placing obligations on appropriate parties to reactivate remote communication capabilities, especially when the customer who has requested the communications be de-activated is no longer associated with that metering installation. This information is only available to the Retailer.

PLUS ES would welcome any further discussion in relation to this submission. If you have any questions or wish for further discussion, please contact Helen Vassos on 0419 322 530 or at Helen.vassos@pluses.com.au.

Sincerely,



A handwritten signature in blue ink, appearing to read "Darren Ferdinands".

Darren Ferdinands

Head of Metering - PLUS ES