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ERC0275 – Introduction of metering coordinator planned interruptions rule

The Australian Energy Council welcomes the opportunity to make a submission to the AEMC consultation on the introduction of metering coordinator planned interruptions rule proposed by the Competitive Metering Industry Group (CMIG).

The Australian Energy Council (AEC) is the industry body representing 21 electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. These businesses collectively generate the overwhelming majority of electricity in Australia and sell gas and electricity to over 10 million homes and businesses.

The AEC supports the direction of the CMIG proposed rule changes.

QUESTION 1: PROPOSED NER AMENDMENT

1.1. What are the benefits of allowing the Metering Coordinator (MC) to arrange and carry out planned supply interruptions?

The customer benefit of allowing the MC to carry out planned supply interruptions is that the installation can be completed at the first visit where consent can be obtained from the affected customers, avoiding further rescheduling and customer inconvenience. This will allow a substantial proportion of those metering installations currently requiring rescheduling for multi occupancy isolation issues (estimated at around 10,000 per annum)¹ to be completed on the first visit.

1.2. What is the magnitude of the issue that the rule change request is attempting to resolve? For example, how many meter installations are delayed due to inability to interrupt the supply of the retailer's customer without interrupting the supply of one or more other customers?

Advice provided to the AEC by the Competitive Metering Industry Group (CMIG) estimates that 5% of all meter installations are delayed because of isolation and notifications issues arising

¹ Introduction of metering coordinator planned interruptions: stakeholder workshop. Estimate provided by Doug Ross of the Competitive Metering Industry Group during Q & A.

from shared isolation points, with about half of that 5% relating to customer-initiated meter replacements. Based on current meter installation volumes, this equates to about 10,000 metering installations per year being delayed because of shared fusing, or about 50 per day.

1.3 Under what circumstances would the rule be used? Do stakeholders consider that there would be any issues if the proposed rule is made with how the rule would interact with retailers, DNSPs and metering parties existing obligations in the NER or NERR?

Installations impacted by shared isolation (fusing) can be broadly classified as those with three customers or less, and those with four or more customers. This latter category includes very large sites, often with dozens of customers.

The CMIG estimates that where metering coordinators would elect to initiate a planned interruption at smaller sites, that is where only 1 or 2 other customers would be impacted, comprises about 80% of affected installations. The complexity associated with managing customer notifications at these sites is small. For the remaining larger and more complex sites, MC's are likely to continue to utilise distributor planned interruptions in practice. However the metering coordinator may still be able to manage notifications in large complex sites with the assistance of building managers, and the AEC seeks sufficient flexibility in the rules so as to enable this.

1.4 Would additional or alternative amendments to the NER be required to address the underlying issues in the rule change request?

The AEC has not identified additional or alternative amendments to the NER that would be required. From prior workshops to develop the rule change proposal, including collaboration with CMIG during their issues identification and issues analysis stages, further requirements were not identified.

Retailers are primarily concerned that the customer experience is safely improved, and we support the intent of this rule change, subject to the matters raised in 3.4 below.

1.5 Are there alternative solutions to introducing metering coordinator planned interruptions which would address the underlying issue of delays in installing or replacing meters in circumstances where there are shared fusing issues?

There are potentially other solutions though whether they are readily implementable is uncertain. For example, the shared fuse or multi occupancy status of a site could be confirmed by a network business. Once confirmed, the network would be obliged to issue out the Planned Interruption Notice (PIN) and to coordinate with the MC for the isolation and installation of the meter within a (newly) regulated deadline. Changing the rules to accomplish this may be of greater complexity than addressing those matters raised in 3.4.

1.6 Should any restrictions be placed on the number of customers whose supply can be interrupted under a metering coordinator planned interruption?

The AEC does not believe that restrictions should be placed in the rules that limit the number of customers whose supply can be interrupted. The specific complexities of multiple sites on a single point of isolation cannot be readily anticipated in the rules, and will vary considerably. We are of the view that the intent of doing what can be done conveniently and safely should be preserved for the widest range of sites. Penalties for incorrectly executed disconnections are proposed to apply equally for MC's as they do for Retailers and Networks.

QUESTION 2: REQUIREMENTS FOR METERING COORDINATOR PLANNED SUPPLY INTERRUPTIONS

2.1 Are retailer planned interruptions required if metering coordinator planned interruptions are introduced? Why or why not?

Retailer planned interruptions will still be required. According to the CMIG, more the 85%² of all metering installation is completed from retailer planned interruptions. There is no requirement to change this arrangement. This rule change seeks to lift successful first visit installations further, with a commensurate improvement in the customer experience, through the addition of the MC option.

2.2 Are additional or alternative amendments to the NERR required or appropriate to address the issues?

The AEC has not identified additional or alternative amendments to the NERR that would be required. From prior workshops to develop the rule change proposal, including collaboration with CMIG during their issues identification and issues analysis stages, further requirements were not identified.

Retailers are concerned that the customer experience is improved, and we support this rule change.

2.3 Are the methods of communicating planned outages, and the information provided in the planned outage communications with other market participants adequate? Are there any further amendments which should be considered?

The use of the existing B2B frameworks (including the web portal framework) are in our view adequate for all market participants to communicate planned outages.

QUESTION 3: OTHER ISSUES

3.1 Do metering coordinators require a specific level of access in MSATS in order to identify the customer who would receive a supply interruption? Is there an alternative method which would be

² Introduction of metering coordinator planned interruptions: stakeholder workshop. Estimate provided by Doug Ross of the Competitive Metering Industry Group during Q & A.

more appropriate to obtain the required information? Are there any issues with providing metering coordinators with access to NMI Discovery?

Metering Coordinators currently have access to NMI discovery in MSATS for the purpose of identifying if a NMI is classified as either *small* or *large*. Incremental access to allow use for planned interruptions would be plausible.

No alternative is required to NMI discovery for obtaining the information required for a planned interruption. There are no issues with providing MP's with greater access to NMI discovery as MCs are subject to the penalties under the rules for misuse as are other users who access NMI discovery. There is a risk in providing MCs with access to too little information.

3.2 What is the most appropriate arrangements for a metering coordinator to determine whether a resident at any of the premises it intends to arrange a planned supply interruption uses life support equipment?

An MC can identify any NMI that needs to be interrupted on site and via a CDR determine a customer's life support status. In this case written notice being delivered to the customer at the site is the most appropriate arrangement. Records of such notice must be readily auditable, and may require additional rule changes.

3.4 Are there any other issues that the Commission should consider in relation to the proposed rule change?

Other issues that require consideration include:

How MC's identify themselves on site may create confusion, as they are a party that the customer is neither aware of nor understands their role, though this may be no more confusing than a network brand.

MC's do not have extensive customer records or contact details, which may lead to customers who are affected by the interruption receiving notices addressed to "the customer" or "the occupant". It is less likely that a customer will open and read a letter addressed this way.

Distribution networks already have the information and regulatory ability to issue and carry out a planned interruption and to carry out this work. To achieve good customer outcomes, MC's must be equipped to act in a comparable manner.

Finally, distribution networks should be required to take the lead in site co-ordination for instances that are distributor initiated, due to aged asset or family failure. This is particularly apparent in larger and more complex multi-sites.

Any questions about our submission should be addressed to David Markham by email to david.markham@energycouncil.com.au or by telephone on (03) 9205 3107.

Yours sincerely,

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