

10 October 2019



Ms Alisa Toomey
Australian Energy Market Commission (AEMC)
PO Box A2449
Sydney South, NSW, 1235

Dear Ms Toomey,

CONSULTATION PAPER: INTRODUCTION OF METERING COORDINATOR PLANNED INTERRUPTIONS

Endeavour Energy appreciates the opportunity to provide this response to the AEMC. We support changes that would help reduce meter installation delays experienced by many shared fuse customers and allow the metering installation timeframes in the National Electricity Rules from which they are currently exempted to apply.

The proposed rule aims to reduce delays for these customers by allowing metering coordinators (MCs) to interrupt supply in shared fuse scenarios. If MCs were able to gain on-the-spot consent of all affected customers to temporarily interrupt their supply via the metering provider (MP), meters could be installed on the first site visit. We believe this would be an improvement on the current arrangements for shared fuse sites which often require MPs to return to the site and complete the work when a distributor planned interruption has been scheduled.

Where on-the-spot consent is not obtained, the proposed rule allows MCs to arrange a planned interruption no less than four business days after notifying all affected customers. This would provide MCs with the flexibility to arrange a meter install on a time and date that better meets their customer's expectations. However, this aspect of the rule change also introduces complexities. For instance, MCs are not obligated to manage and maintain a life support register. Without being able to identify premises with life support requirements, the proposed rule increases the risk that interruption notification requirements for life support customers will not be met by MCs.

Also, restricted access to NMI standing data means compliance with obligations to notify each customer and their retailer of a planned outage for sites where they are not the MC would be problematic. We are also concerned that customers could mistake notifications issued by any party other than their current retailer or DNSP as a form of marketing material and unwittingly disregard the planned interruption notice.

Although providing MCs with the same rights as DNSPs and retailers to arrange planned interruptions could reduce delays, these issues demonstrate that MCs do not currently have the tools and capabilities necessary to comply with the obligations that are attached to these rights. We believe the changes needed to give effect to the proposed rule and protect the service levels of affected customers may not be a proportionate response to this issue, noting the relatively small number of metering installations delayed due to a shared isolation point.

Therefore, we encourage the AEMC to also consider alternative ways the objective of the proposed rule could be achieved by leveraging from current processes and the capabilities of retailers. For example, metering delays could be avoided by allowing a retailer planned interruption to be arranged in shared fuse situations. This would encourage retailers to work more collaboratively when issuing planned interruption notices to their customers and avoids the complexities, costs and risks associated with delegating authority for interrupting supply to multiple customers to MCs. This option is outlined in more detail in Attachment 1.

Our responses to the questions in the consultation paper are included in Attachment 1. If you wish to discuss this submission further please contact Joe Romiti, Regulatory Analyst at Endeavour Energy on (02) 9853 6232 or via email at joseph.romiti@endeavourenergy.com.au.

A handwritten signature in black ink, appearing to read "Jon Hocking".

Jon Hocking
Manager Network Regulation

Attachment 1: Responses to questions in the consultation paper

Question 1: Proposed NER amendment

1.1. What are the benefits of allowing metering coordinators to arrange and carry out planned supply interruptions?

Exemptions to the metering installations timeframes rule change means customers with a shared isolation point will continue to experience delays in having a new meter installed relative to other customers. We agree that amending the NER and NERR to allow MCs the option to arrange planned interruptions could reduce these delays.

If on-the-spot consent is obtained from all affected customers, meters could be installed on the first site visit. If consent is not obtained, MPs would alternatively be able to issue notifications for a planned supply interruption at a future date and return to the site no sooner than four business days to complete the installation. This would negate the need to request a distributor planned interruption and provides the MC with the flexibility to arrange the interruption and meter install on a time and date that better meets the customer's expectations.

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?

We have processed 400 valid requests for group supply isolation service orders since 1 December 2017. During this period there were 87,800 sites where interval meters were installed. Therefore, sites that required our assistance to interrupt supply represent 0.46% of interval meter installs.

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?

We expect MPs would most frequently use this rule when they consider on-the-spot consent for an immediate interruption could be obtained from all affected customers promptly and with relative ease. This would support the rule change proponent's desire to allow meter installations to be completed on the first visit for small multioccupancies which accounts for most sites with a shared isolation point.

Where MPs do not obtain consent, the proposed rule change would allow MCs to arrange a planned interruption. Although this would be available to the MP if consent has been sought but not been given, we suspect notifications for a future interruption will be made when the MP believes seeking consent from multiple customers would be too time consuming or problematic.

Allowing an MP to install or replace a meter once they have obtained the consent of all affected customers would in most instances be a simple and pragmatic solution that would address many of the frustrations encountered by MPs at shared fuse premises. However, issues arising from allowing MCs to arrange a future interruption could be avoided if these responsibilities were placed with retailers. For instance, allocating responsibilities to retailers would:

- make compliance easier to monitor because the retailer would be entirely responsible for meeting the specified timeframe for installing new and replacement meters;
- avoid customer confusion as any delivered supply interruption notices would be from a retailer and not the MC who customers are unlikely to be familiar with and consequently disregard;
- be a less costly solution because retailers and DNSPs already have processes and systems to manage retailer planned interruptions and sharing of life support information; and
- be consistent with the current framework where retailers have the right to arrange a planned interruption, even though it is the MP who actually performs the interruption in the field.

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

Currently, retailers are prohibited from interrupting supply to a customer who is not the customer of the retailer arranging the interruption.¹ In our view, this clause allows retailers to interrupt supply at a shared isolation point where they are also the retailer for all the impacted customers.

Some retailers have informed us they have a different interpretation of the rule and consider the Rules prevent them from arranging a retailer planned interruption where it would impact any customer other than the customer receiving the new meter.

We believe this clause requires clarification. If the definition of 'retailer planned interruption' was amended to clarify that a retailer could interrupt supply to their customer if it is for the purposes of installing, maintaining, repairing or replacing an electricity meter for another of the retailer's customers who has a shared isolation point, then this would allow the MP (once they confirm that all impacted customers belong to the same retailer) to exercise their obligations under sections 59C of the NERR without needing to initiate a metering coordinator or distributor planned interruption.

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?

An alternative to the proposed rule change would be to expand the circumstances where a retailer could perform a retailer planned interruption. The same beneficial outcomes could be achieved if retailers were allowed to interrupt supply to another retailer's customer only for the purposes of installing a meter where they share a supply isolation point and where on-the-spot explicit consent from all affected customers could not be obtained.

This approach avoids creating a third category of planned isolation and delegating authority over interrupting a customer's electricity supply to a party that would be relatively unknown to most consumers. It would also avoid complexity and confusion around potentially overlapping responsibilities and accountabilities between the retailer, MC and MP.

Another potential alternative is for the initiating retailer to coordinate a retailer planned interruption with the retailers of impacted customers and obligate each impacted retailer to notify their customers accordingly. A significant advantage of this approach is that affected customers would receive interruption notices from their own retailer or DNSP as opposed to another customer's MC. This approach would entail the following steps:

Step	Description	Comments
1	Retailer arranges a retailer planned interruption.	
2	MP identifies a shared isolation scenario upon arrival.	
3	MP identifies impacted premises by inspecting the switchboard.	
4	MP attempts to get on-the-spot consent from impacted customers for a temporary supply interruption.	
5	If on-the-spot consent from all impacted customers is obtained, then MP interrupts supply and proceeds with metering work.	This requires a rule change to allow a retailer to interrupt supply to customers of other retailers. This should be limited to where it is a shared isolation scenario and on-the-spot explicit consent is obtained.
6	If on-the-spot agreement from all impacted customers cannot be obtained, then the MP informs the retailer that metering work was not completed due to a shared isolation scenario. The MP will also provide the retailer the meter serial ID of impacted meters and available date(s) they can return to the site to complete the metering work.	

¹ Clause 59B(b)(ii) of the NERR

7	Retailer checks if all impacted premises are their customers. If yes, then they can go to step 8. If no, then they can go to step 9 or step 10.	
8	Retailers send retailer planned interruption notice with at least 4 business days notice before the date of the interruption and informs the MP of the interruption date. Next step is step 11.	The term 'retailer planned interruption' should be amended to clarify that this is allowed.
9a	The retailer performs NMI Discovery, using the meter serial ID, to identify impacted NMI and FRMPs.	MSATS NMI Discovery may need to be updated.
9b	Retailer sends a request via B2B to impacted FRMPs to notify their customer of supply interruption. Retailer needs to provide future field work date to the impacted FRMP.	This requires a change in the Rules that obligates a Retailer to accept and action a request to arrange a retailer planned interruption and would require a new B2B transaction.
9c	Impacted FRMPs arranges a retailer planned interruption for their affected customer and sends a confirmation via B2B when this is done.	
9d	Retailer confirms the interruption date with the MP when they receive positive confirmation from all impacted FRMPs that they have notified their customers. Next step is step 11.	
10a	Retailer sends a request via B2B to the DNSP to notify affected premises of a group supply interruption and perform isolation. Retailer needs to provide future field work date to the DNSP.	This is a BAU process. We propose the option for the DNSP to arrange the isolation to be maintained as there are scenarios where the metering provider is unable to safely perform the isolation (e.g. live work is required to perform the isolation).
10b	DNSP identifies customers at premises and issues supply interruption notification.	
10c	DNSP attends site on nominated date and perform isolation. Next step is step 11.	
11	MP attends site on nominated date and performs metering work.	

We consider retailers should have options to manage the shared isolation scenario to allow them to better manage their obligations and meet their customer's expectations. Providing this flexibility would further support the case to remove shared isolations from the list of exempted scenarios to the metering installation timeframes rule change.

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

If MCs are allowed to arrange planned interruptions as proposed, then there should be no restriction on the number of customers whose supply can be interrupted through the proposed rule change. MCs should be able to use their discretion over whether to attempt to gain on-the-spot consent, provide affected customers with an interruption notice or to request a distributor planned interruption in all shared isolation situations.

As discussed in 1.3, we expect MCs will arrange a metering coordinator planned interruption or have the retailer request a distributor planned interruption where they consider gaining on-the-spot consent is time consuming and may impact the MP's other scheduled work. Gaining on-the-spot consent becomes more problematic and the obligations more onerous as the number of customers connected to the isolation point increases. As a result, it might become common for MCs to resort to issuing interruption notifications when organising a meter installation at a large multi-occupancy site.

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?

If MCs are allowed to arrange planned interruptions as proposed, then removing the rights for a retailer to arrange planned interruptions may help to avoid confusion over whose right is being exercised when an MP is performing the isolation in the field and ultimately who is responsible when an obligation is breached.

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

We consider MCs should have the same obligations as retailers and DNSPs regarding life support customers. This would include maintaining a life support register, sharing life support information with retailers and DNSPs and following the life support deregistration process prior to removing a customer from their life support register.

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?

In addition to the existing notice requirements between market participants, we believe notifications made by an MC should contain information about the customer's rights such as how the customer can make a complaint, contact details of the relevant energy ombudsman and how they can inform the MC of any life support equipment at the premises. Currently this information is provided by retailers and DNSPs via the contracts they have with the customer.

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

MCs will need to be able to identify impacted FRMPs and LNSPs based on a meter serial ID so that they can notify them both of any metering coordinator planned interruption. We believe NMI Discovery would be appropriate for this provided that results of NMI Discovery are limited to the information that is only necessary for the MC to meet their obligations.

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?

To avoid breaching provisions in the Rules that protect life support customers, MCs need to have visibility of registered life support premises. Once they have identified each premise that would be affected by a planned interruption, MCs could obtain life support information by raising a Life Support Request (LSR) through B2B.

However, this would not capture life support customers who register in the period between when the CDR was raised and the planned outage. Therefore, alternative options for managing life support customers should be considered, for example having a central life support registry accessible to all authorised parties including MCs.

3.3. Should customers have any access to dispute resolution or another form of recourse if a metering coordinator breaches any of the rules in relation to metering coordinator planned interruptions?

The proposed rule change provides MCs with increased levels of responsibility over customers' electricity supply for which they should be accountable. As an essential service, any failure by the MC to comply with isolation and notification obligations is likely to have a material impact on customer well-being. We believe it is appropriate that customers should have access to adequate forms of recourse, so they can escalate issues that are not initially resolved to their satisfaction by the MC.

