10 October 2019

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

Dear Mr Pierce

Introduction of Metering Coordinator Planned Interruptions (ERC0275)

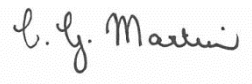
Energy Queensland Limited (Energy Queensland) appreciates the opportunity to provide a submission to the Australian Energy Market Commission (AEMC) in response to the *National Electricity Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule, National Energy Retail Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule consultation paper* (consultation paper). The consultation paper is in response to a rule change request seeking to introduce metering coordinator planned interruptions for the purposes of installing, maintaining, repairing or replacing an electricity meter.

Energy Queensland supports "in principle" allowing metering coordinators to undertake planned interruptions for metering-related services where the interruption can be coordinated more efficiently by that entity. We consider that allowing metering coordinator planned interruptions may provide a valuable alternative for effecting interruptions to supply, along with retailer planned interruptions and distributor planned interruptions, where it is considered to be the most effective and practical solution and where the metering coordinator is willing to take on the additional responsibility and associated liabilities.

However, Energy Queensland is concerned that there are a number of obstacles and issues that must be considered and resolved if this rule change proposal is to be progressed as proposed. Our comments on those issues and the issues raised by the AEMC in its consultation paper are provided in the attached submission.

Should the AEMC require additional information or wish to discuss any aspect of Energy Queensland's submission, please do not hesitate to contact me on (07) 3664 4105.

Yours sincerely



Charmain Martin
Acting Manager Policy and Regulatory Reform
Telephone: (07) 3664 4105 or 0438 021 254
Email: charmain.martin@energyq.com.au

Energy Queensland

Submission to the Australian Energy Market Commission

Introduction of Metering Coordinator planned interruptions

Energy Queensland Limited

10 October 2019

About Energy Queensland

Energy Queensland Limited (Energy Queensland) is a Queensland Government Owned Corporation that operates a group of businesses providing energy services across Queensland and the National Electricity Market (NEM), including:

- Distribution Network Service Providers, Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy);
- a regional service delivery retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail); and
- an affiliated contestable business, Yurika Pty Ltd (Yurika), which includes Metering Dynamics Pty Ltd (Metering Dynamics).

Energy Queensland's purpose is to safely deliver secure, affordable and sustainable energy solutions with our communities and customers and is focussed on working across its portfolio of activities to deliver customers lower, more predictable power bills while maintaining a safe and reliable supply and a great customer experience.

Our distribution businesses, Energex and Ergon Energy, cover 1.7 million km^2 and supply 37,208 GWh of energy to 2.1 million homes and businesses. Ergon Energy Retail sells electricity to 740,000 customers.

The Energy Queensland Group also includes Yurika, an energy services business creating innovative solutions to deliver customers greater choice and control over their energy needs and access to new solutions and technologies. Metering Dynamics, which is a part of Yurika, is a registered Metering Coordinator, Metering Provider, Metering Data Provider and Embedded Network Manager. Yurika is a key pillar to ensuring that Energy Queensland is able to meet and adapt to changes and developments in the rapidly evolving energy market.

Contact details

Energy Queensland Limited
Trudy Fraser
Phone: +61 (7) 3851 6787
Email: trudy.fraser@energyq.com.au

PO Box 1090, Townsville QLD 4810
Level 6, 420 Flinders Street, Townsville QLD 4810
www.energyq.com.au

Energy Queensland Limited ABN 96 612 535 583

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1 Introduction

On 29 August 2019, the Australian Energy Market Commission (AEMC) published the *National Electricity Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule, National Energy Retail Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule consultation paper* (consultation paper). The consultation paper is in response to a rule change request seeking to introduce metering coordinator planned interruptions for the purposes of installing, maintaining, repairing or replacing an electricity meter.

The objective of the rule change proposal, submitted to the AEMC by the Chair of the Competitive Metering Industry Group, is to minimise delays faced by customers in multi-occupancy premises, or customers who share an isolation fuse with other customers, that occur due to metering works not being able to commence without interrupting supply to another customer or customers. Under current arrangements, only distribution network service providers can arrange for a planned interruption to a customer's supply where the customer is not the customer of the retailer arranging the interruption.

The AEMC has highlighted a range of issues in the consultation paper, including:

- The costs and benefits of allowing metering coordinators to arrange planned supply interruptions;
- Whether there are alternative solutions to introducing metering coordinator planned interruptions that address the underlying issues;
- How metering coordinator planned interruptions would interact with existing retailer, distributor and metering coordinator obligations under the National Electricity Rules (NER) and National Energy Retail Rules (NERR);
- Whether there are other issues that should be taken into consideration in relation to the proposed rule change.

The AEMC has requested that interested parties make submissions on the draft rule determination by 10 October 2019. Energy Queensland's comments are provided in Section 2 and 3 of this submission.

We are available to discuss this submission or provide further detail regarding the issues raised.

2 General comments

Energy Queensland acknowledges that, in some circumstances, delays in completing metering works may be caused as a result of issues experienced in interrupting supply to multiple customers in multi-tenancy premises and, as such, supports “in principle” allowing metering coordinators to undertake planned interruptions for metering-related services where the interruption can be coordinated more efficiently by that entity. In particular, we consider that allowing metering coordinator planned interruptions may provide a valuable alternative for effecting interruptions to supply, along with retailer planned interruptions and distributor planned interruptions, where it is considered to be the most effective and practical solution and where the metering coordinator is willing to take on the additional responsibility and associated liabilities. However, Energy Queensland is concerned that there are a number of obstacles and issues that must be considered and resolved if this rule change proposal is to be progressed as proposed.

A key issue that will require further consideration is that metering coordinators do not have a direct relationship with small customers. The AEMC’s final rule determination on the *Expanding competition in metering and related services* rule change transferred responsibility for the provision of metering services to customers from distribution network service providers to metering coordinators. However, while distributors continue to have a relationship with customers through their role in owning, controlling and operating the distribution system, retailers remain the key point of contact for small customers, despite having responsibility for appointing a metering coordinator for the metering installation. Therefore, allowing metering coordinators to provide notification of planned interruptions has the potential to create confusion and the risk that planned interruption notifications will be disregarded.

Furthermore, it is unclear as to how metering coordinators would be able to access the personal information of customers for whom the metering coordinator is not responsible for providing metering services. Along with privacy issues, the current metering framework does not capture the relevant information provisions that would be required to facilitate metering coordinator planned interruptions where the metering coordinator is not responsible for the metering installation at a connection point. In addition, the Market Settlement and Transfer Solution (MSATS) does not hold the customer details that metering coordinators would require to provide advance notification of planned interruptions, including the National Metering Identifier (NMI), responsible participants and details of any life support equipment at the premises. Unless these issues can be resolved, the circumstances in which metering coordinator planned interruptions are likely to be feasible will be limited.

In addition, there are also a number of other requirements that must be addressed before metering coordinators can take on the responsibilities involved in undertaking planned interruptions, including the ability to demonstrate that they have the necessary systems and processes in place to manage and comply with the obligations that the right to interrupt supply involves. While these requirements may not be insurmountable, Energy Queensland is concerned that the costs to implement the necessary system and process changes, in conjunction with associated risks such as exposure to civil penalties for non-compliance, may outweigh the benefits.

In conclusion, if the abovementioned issues can be addressed satisfactorily, Energy Queensland is supportive of allowing metering coordinator planned interruptions where it is considered to be the most efficient and practical solution and as an alternative to retailer and distributor planned interruptions. In particular, at a minimum, it may be of benefit for metering coordinators to have the ability to obtain explicit consent from customers in multi-tenancy premises to undertake a planned interruption where advance notification has not been provided to all impacted customers. However, Energy Queensland urges that care should be taken to ensure that further complexity is not added to the process unless it will lead to shorter timeframes, reduced costs and better outcomes for customers.

To assist the AEMC in its consideration of this rule change, Energy Queensland has provided detailed responses to the specific issues raised in section 3 of this submission.

3 Detailed comments

Energy Queensland provides the following comments on the proposed rule change for further consideration by the AEMC:

AEMC Question	Energy Queensland Response
QUESTION 1: PROPOSED NER AMENDMENT	
1.1. What are the benefits of allowing metering coordinators to arrange and carry out planned supply interruptions?	Energy Queensland acknowledges that there may be some benefits in allowing metering coordinators to undertake planned interruptions in certain circumstances. These benefits may include reduced timeframes, lower costs and better outcomes for customers. However, Energy Queensland considers that any benefits will likely be limited by the circumstances in which a metering coordinator planned interruption will be the most effective and practical solution for effecting the interruption. In many instances, it is possible that a distributor or retailer planned interruption would be the more suitable (or preferred) option. For example: • a retailer planned interruption may still be the preferred option for single customer interruptions and retailer-led deployment of advanced meters; and • a distributor planned interruption may still be the preferred option for larger multi-tenancy premises with shared fusing or for complex meter exchanges where coordination with the distributor is required. It is also anticipated that metering coordinators are likely to continue to experience obstacles to coordinating planned interruptions, due to issues such as: • inaccurate customer details; • customers not being at home at the time of the site visit to provide their explicit consent to a supply interruption;

AEMC Question	Energy Queensland Response
	• obtaining agreement as to the timing of an interruption (particularly where there is a mix of residential and commercial customers in multi-tenancy premises); or • the metering provider not having the authorisation to operate an isolation device. Further, it is unclear to Energy Queensland whether the benefits of the proposed rule change will outweigh the costs that are likely to be incurred by metering coordinators in implementing the process and system changes necessary to be able to perform planned interruptions, in conjunction with associated risks such as exposure to civil penalties for non-compliance.
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?	Energy Queensland understands that the magnitude of this issue may not be as significant in Queensland as it is in other jurisdictions where issues associated with historic shared fusing practices are more prevalent. In Queensland, it has been a requirement for some time that meter isolation links must be installed for all new connections and in conjunction with major customer switchboard alterations so that each customer can be individually disconnected. It is anticipated that the ongoing installation of meter isolation links and advanced meters will gradually lessen the problem this rule change is attempting to resolve, i.e. the need to interrupt supply to multiple customers. Energy Queensland's contestable metering business, Metering Dynamics, has noted that only a small percentage of metering jobs are delayed due to the requirement for group isolation in multi-tenancy sites. Over the past six months only two per cent of delays experienced by Metering Dynamics were due to this reason. Further, for the AEMC's information, in the past 12 months Energex and Ergon Energy received a total of 877 temporary isolation requests from retailers (264 Energex and 613 Ergon Energy).

AEMC Question	Energy Queensland Response
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?	If a metering coordinator has the processes and systems in place to comply with planned interruption obligations and is willing to take on this responsibility and associated liabilities, Energy Queensland considers there may be situations where a metering coordinator planned interruption would be the most effective and efficient option. For example, a metering coordinator planned interruption may be appropriate: • in multi-tenancy premises where multiple customers will be impacted and the distributor is not required to isolate supply; or • where a metering provider attends site to perform work for a customer in a multi-tenancy premises and is able to obtain explicit consent to interrupt supply to other customers so that the metering work can be performed as planned. Regardless of the circumstances in which metering coordinator planned interruptions can be used, it will be important that the right to interrupt supply and the respective roles and responsibilities for retailer planned interruptions, distributor planned interruptions and metering coordinator planned interruptions are clearly defined in the NER and NERR.
1.4 Would additional or alternative amendments to the NER be required to address the underlying issues in the rule change request?	As noted previously, the information provision requirements under Chapter 7 of the NER will require consideration in conjunction with privacy legislation.
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?	Energy Queensland understands alternative solutions to metering coordinator planned interruptions have been proposed by various parties to address the underlying issues, including a greater role for distributors in coordinating interruptions. While Energy Queensland agrees that inefficiencies that have arisen as a result of the introduction of Power of Choice need to be addressed, we are concerned that care should be taken to ensure that any changes to

AEMC Question	Energy Queensland Response
	current arrangements lead to lower costs and better outcomes for customers. For instance, placing further reliance on distributors to coordinate planned interruptions may not be the most cost-effective or efficient alternative as this service would attract an Australian Energy Regulator (AER)-approved alternative control service fee and potentially lead to further delays depending on distributor resourcing and scheduling issues. If further consideration is given to an alternative solution to that put forward by the rule change proponent, Energy Queensland would appreciate the opportunity to provide further comment.
1.6 Should any restrictions be placed on the number of customers whose supply can be interrupted under a metering coordinator planned interruption?	Energy Queensland does not consider that it would be necessary to place a restriction on the number of customers whose supply can be interrupted under a metering coordinator planned interruption. The retailer and / or metering coordinator should have the ability to determine whether a metering coordinator planned interruption is appropriate under the circumstances or whether a distributor planned interruption is required.
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?	Energy Queensland supports retaining retailer planned interruptions. As noted above, there may be circumstances where the preferred option is to perform a retailer planned interruption, for example, single customer interruptions or retailer-led advanced meter deployments.
2.2 Are additional or alternative amendments to the NERR required or appropriate to address the issues?	Amendments to the NERR will be required to give effect to metering coordinator planned interruptions, with similar obligations to those of retailer and distributor planned interruptions.

AEMC Question	Energy Queensland Response
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?	Energy Queensland considers the current information requirements for planned interruptions are largely sufficient. However, further consideration would need to be given to: • Branding issues, such as whether the notification should be issued with metering coordinator branding or that of the retailer requesting the planned interruption, noting that the metering coordinator and / or retailer requesting the planned interruption may not have a relationship with all customers whose supply is being interrupted; • Information required to be provided when a customer's explicit consent is requested on-site; • Communication by metering coordinators to retailers and distributors advising details of the planned interruption (including a contact telephone number for customer enquiries) within applicable timeframes and details as to how this will be managed when customers' explicit consent is obtained on-site; • The requirement for metering coordinators to provide a 24-hour telephone number for enquiries (the charge for which is no more than the cost of a local call); and • Inclusion of a statement that any enquiries regarding the metering coordinator planned interruption is to be directed to the metering coordinator.
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?	MSATS does not hold customer information to enable metering coordinator planned interruptions, including details that would be necessary to identify life support customers. The only process that would currently allow

AEMC Question	Energy Queensland Response
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?	for metering coordinators to obtain the necessary information would be for the metering coordinator to: • conduct a NMI discovery to identify all NMIs at the premises and the responsible participants; and • contact the responsible retailers (or distributor) for each impacted customer and request customer contact details, including details of any life support customers. However, while metering coordinators have recently been provided with NMI discovery access (that would allow visibility of NMI data and details of current participants), they are only permitted to conduct NMI discovery for a NMI for which they are the proposed metering coordinator for the purpose of determining the NMI class under the current MSATS Procedures.
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?	Once the NMI has been identified, the metering coordinator would need to contact the responsible retailer or the distributor to confirm life support details. However, the metering coordinator cannot request this information if they do not have a relationship with the customer.
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?	Energy Queensland considers that the same obligations with respect to complaint management, dispute resolution and compliance that currently apply to retailers and distributors with respect to planned interruptions should also apply to metering coordinators.
3.4 Are there any other issues that the Commission should consider in relation to the proposed rule change?	The proposed rule change would require metering coordinators to develop and implement processes and make system enhancements to support metering coordinator planned interruptions. This requirement will create an additional administrative and cost burden for metering coordinators which may potentially outweigh the benefits.

AEMC Question	Energy Queensland Response
	Some of the issues identified by Energy Queensland for further consideration include the following: • As part of their registration and accreditation requirements, metering coordinators will need to be able to demonstrate to the Australian Energy Market Operator that they have the appropriate policies and procedures in place to comply with metering coordinator planned interruption obligations. • Metering coordinators' systems will require the ability to initiate market transactions for NMIs and to participants with whom the metering coordinator does not have a relationship. • Metering coordinators will require the ability to identify NMIs, responsible participants and customer details for NMIs where the metering coordinator is not the metering coordinator for the site and / or the retailer is not the retailer arranging the interruption. • Metering coordinators will require the ability to identify customers' premises where a person residing at the premises requires life support equipment, including for premises where the metering coordinator is not the incumbent metering coordinator and the retailer is not the retailer requesting the planned interruption (noting that retailers also do not have this ability where they are not the financially responsible Market Participant). • Metering coordinators will need to develop the capability to capture and manage customer consent to an outage for metering works to take place (which must be held for a minimum of two years) and for issuing notices for metering coordinator planned interruptions within specified timeframes.

AEMC Question	Energy Queensland Response
	• Metering coordinators will need to have systems and process capability to manage notifications to impacted retailers and the distributor. • Metering coordinators will need to comply with specified metering installation timeframes if the exemption relating to interrupting supply to another retail customer is removed and the objective of improving timeframe outcomes is to be achieved. These timeframes will need to be met regardless of issues that may be experienced in arranging outages (for example, where it is subsequently determined that distributor assistance is required). • Metering coordinators will need to take on additional civil penalty obligations and face exposure to potential penalties and enforcement action by the AER for non-compliance with planned interruption and / or metering installation timeframe obligations. It should also be noted that there may be the potential for retailers and distributors to receive increased enquiries and complaints due to confusion that may arise from metering coordinator planned interruption notifications and the potential for notifications to be disregarded.