

9 October 2019

Mr John Pierce
Chair
Australian Energy Market Commission
PO BOX A2449
Sydney South NSW 1235

Via online submission.

Dear Mr Pierce,

Re: ERC0275 – NATIONAL ELECTRICITY AMENDMENT (INTRODUCTION OF METERING COORDINATOR PLANNED INTERRUPTIONS) RULE

TasNetworks welcomes the opportunity to make a submission to the Australian Energy Market Commission's (**AEMC**) consultation paper on the National Electricity Rule Amendment - Introduction of Metering Coordinator Planned Interruptions.

As the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and jurisdictional planner in Tasmania, TasNetworks is focused on delivering safe and reliable electricity network services while achieving the lowest sustainable prices for Tasmanian customers. TasNetworks is also currently assessing the feasibility of Marinus Link, a second Bass Strait interconnector between Victoria and Tasmania. All of these roles require the prudent, safe and efficient management and development of the Tasmanian power system. TasNetworks is therefore appreciative of the AEMC's efforts to review Metering Coordinator (**MC**) powers under the National Electricity Rules (**NER**).

In principle, TasNetworks is mostly supportive of the Introduction of the MC Planned Interruptions rule change as it will help to improve customer service for customers of the National Electricity Market (**NEM**). However, there are a few issues which need to be considered.

- *The Privacy Act 1988* (Cth) precludes DNSPs and retailers from providing confidential customer information to third parties such as MCs, therefore TasNetworks advocates for current business to business (**B2B**) transactions to be enhanced to support the provision of life support information to MCs. This could be done via a bilateral approach between the retailer and the MC.
- If additional costs are generated from the MC Planned Interruption proposed rule change, TasNetworks would only consider minimal or non-existent costs to DNSP customers to be prudent.

- To ensure customers protections provided by retailer interruptions, such as Ombudsmen and dispute resolution processes, MC planned interruptions should only occur after, or as part of, a retailer planned interruption.
- TasNetworks would also like to note that if the MC Planned Interruption rule change is implemented, care must be taken to ensure no additional complexities are introduced into the current processes developed through The Power of Choice reforms. The introduction of such complexities would lead to poorer customer service outcomes and increased costs for customers. An example of this would be if DNSPs are required to develop, test and implement new IT systems for the proposed MC Planned Interruption rule change, when a minor change to B2B transactions would have the same effect at a much lower cost.
- Finally, TasNetworks would support the proposed Introduction of the MC Planned Interruptions rule change to be used to clarify the scope of retailer planned interruptions so as to promote flexibility. This is because the current Rules can be interpreted in a way which may hinder efficient work practices.

TasNetworks responses to individual questions are provided below and we welcome the opportunity to discuss this submission further with you. Should you have any questions, please contact Tim Astley, Team Leader NEM Strategy and Compliance, via email tim.astley@tasnetworks.com.au or by phone on (03) 6271 6151.

Yours sincerely,



Chantal Hopwood
Leader, Regulation.

QUESTION 1: PROPOSED NER AMENDMENT

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

The main benefit of allowing MCs to arrange and carry out planned supply interruptions would be an enhanced customer experience, mainly due to a more efficient meter installation process and a reduction in the number of site visits required to install type 4 meters. TasNetworks' customer strategy vision is 'we care for our customers and make their experience easier', as such, TasNetworks is supportive of any Rule changes that enhance the experience for our customers. Nevertheless, as the majority of customers interact with the NEM through their retailer, and are not familiar with the Power of Choice reform roles of MC or Metering Provider (**MP**), care should be taken not to add additional layers of complexity to an already intricate processes.

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?

TasNetworks agrees with the AEMC's analysis of recently unsuccessful meter installation works due to shared isolation, and concurs that the magnitude of the issue is a small percentage of scheduled type 4 meter installation work. As such, customers should not be legislated to bear the cost of DNSP IT system modifications, which would be required by the introduction of the proposed MC Planned Interruption rule, when minor B2B transaction alterations would provide the same information at a fraction of the cost.

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?

The proposed MC Planned Interruption rule should only be used for installations with shared isolation points which may result in delays in the installation of metering equipment. Additionally, the proposed rule should only apply when a shared isolation point has been verified and when all customers affected by the proposed isolation have been provided the standard notification period under the Rules.

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

If TasNetworks' proposal of altering B2B transactions was incorporated into the proposed MC Planned Interruption rule, AEMO's B2B Procedures would need to change in line with clause 7.17.3 of the NER.

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 MC planned interruptions being added to the NER is for MC planned interruptions to occur after, or as part of a retailer planned interruption. The benefit of this alternative is that customers would be afforded the usual customer protections of a retailer planned interruption, for example Ombudsmen and disputes resolution processes.

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

Provided TasNetworks' infrastructure is used safely and only for isolation to install type 4 meters, TasNetworks does not consider a restriction should be placed on the number of customers whose electricity can be interrupted for a type 4 meter to be installed.

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?

To allow for appropriate Ombudsman and dispute resolution processes and protections for customers, TasNetworks considers that the introduction of a MC Planned Interruptions rule must make it clear under whose authority the MC is acting. Following on from this point, it would seem more appropriate for MC planned interruptions to occur only after, or as part of, retailer planned interruptions.

Concurrently, TasNetworks would also propose that the introduction of the MC Planned Interruptions rule be used to clarify the scope of retailer planned interruptions so as to promote flexibility, as the current Rules can be interpreted in a way which stops efficient work practices.

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

TasNetworks is not aware of any further deletions or additions needed to the NERR other than those mentioned by the AEMC.

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?

TasNetworks considers the current arrangement of communicating DNSP planned outages to other market participants and customers to be adequate.

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?

The Privacy Act 1988 (Cth) precludes DNSPs and retailers from providing confidential customer information to third parties, like MCs. Therefore, TasNetworks advocates for the current Business to Business (B2B) information transactions of Customer Details Request (CDR) and Customer Details Notification (CDN) or Life Support Request (LSR) and Life Support Notification (LSN) to be enhanced to support the provision of life support information to MCs. This could be done via a bilateral approach between retailers and the MCs and would mean that customers would continue to be afforded consumer protections for any electrical work performed by MPs.

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?

Similarly to our response to 3.1, TasNetworks advocates for current B2B transactions to be enhanced to support the provision of life support information to the MC. This could be done via a bilateral approach between the retailer and the MC using CDR/CDN or LSR/LSN.

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?

It is important to TasNetworks that all NEM customers have access to dispute resolution or recourse for breaches of the Rules. As such, it would seem to make the most sense that MC planned interruptions occur only after, or as part of, a retailer planned interruption.

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

TasNetworks would consider it prudent that, if additional costs are generated from the MC Planned Interruption proposed rule change, that they should be minimal or non-existent to DNSP customers.