

Submission to the Australian Energy Market Commission (AEMC)

Review of the regulatory framework for metering services

Prepared by the metering sub-group of the SA Power Networks Connections Working Group

February 2021

SUBMITTER DETAILS

ORGANISATION:	SA Power Networks Connections Working Group
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DATE	11 February 2021

PROJECT DETAILS

NAME OF RULE CHANGE:	Review of the regulatory framework for metering services
PROJECT CODE:	EMO0040
PROPONENT:	AEMC
SUBMISSION DUE DATE:	11 February 2021

11 February 2021

Ms Alisa Toomey
Australian Energy Market Commission
Submitted electronically via aemc.gov.au

Dear Ms Toomey

Review of the Regulatory Framework for Metering Services - Consultation Paper (EMO0040)

SA Power Networks Connections Working Group thanks the Australian Energy Market Commission (AEMC) for the opportunity to provide feedback to the review of the regulatory framework for metering services.

The SA Power Networks Connections Working Group (CWG) is an independently chaired industry group established in August 2019 to advise SA Power Networks on ways to improve the customer experience in the connections process and provide a forum for customer views to be considered and discussed.

Since the formation of the group, metering has been consistently raised as a key consumer pain point and in early 2020, we established a metering sub-group to look at opportunities to improve how we work within the current framework and look at opportunities for regulatory change.

This submission includes the results of an industry survey conducted specifically for this review and we believe this will provide the AEMC with valuable insights.

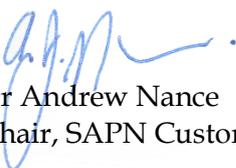
The CWG would welcome an opportunity to meet with the AEMC in order to outline our issues and develop a proposal to improve communication between all parties (energy retailers/ metering providers/ solar and electrical installers and contractors/ SAPN) involved in metering to ensure industry needs are understood.

To ensure input into the framework going forward, we would like to nominate Ben Lovell, Managing Director at Living Energy, to sit on the AEMC Reference Group to be established.

The CWG strongly encourage the AEMC to consider the experiences that customers and industry have had with the competition in metering framework.

Please contact me on 0403 602 444 if you have any questions regarding our submission.

Yours sincerely



Dr Andrew Nance
Chair, SAPN Customer Consultative Panel and Connections Working Group

Purpose:

Licensed Solar and Electrical Contractors are a key interface between household and business energy customers and their experiences under the regulatory framework for metering services.

This submission provides an overview of the key issues experienced by Solar and Electrical contractors in relation to new or altered metering installations in South Australia under the current framework. The submission is supported by case studies highlighting where we believe the current metering framework provides poor outcomes for customers and the industry.

Background:

The SA Power Networks Connections Working Group (CWG) is an independently chaired industry group established in August 2019 to advise SA Power Networks on ways to improve the customer experience in the connections process and provide a forum for customer views to be considered and discussed. The group consists of representatives from the renewable and solar industry, energy consultants, electrical contractors and key industry bodies, such as the National Electrical and Communications Association (NECA) and Master Electricians Australia (MEA).

Since the formation of the group, metering has been raised as a key consumer pain point and in early 2020, we established a metering sub-group to look at opportunities to improve how we work within the current framework and look at opportunities for regulatory change. The sub-group includes representatives from the CWG, as well as representatives from AGL and Intellihub.

While the relationship between metering coordinators, SA Power Networks and retailers now appears to be working well, the CWG has found that solar installers and electricians, who have been appointed as a contractor by the customer, are experiencing significant challenges from the lack of communication being provided by retailers and metering providers on when new metering will be installed, and in relation to questionable compliance issues that Metering Contractors / Field Services Providers cite as reasons for deeming a meter changeover as 'unable to complete'.

Summary of current metering process and naming systems

To change a meter the following happens:

- 1- Consumer or Solar Retailer or Electrical Contractor requests a Meter Change to the Energy Retailer
- 2- Energy Retailer Engages a Metering Provider (MP) eg iHub/Vector/PlusES
- 3- The MP then engage a Field Service Provider (FSP) to do the works
- 4- The FSP then have their employee or a Metering Contractor (MC) change the meter over
 - a. If unable to complete the works, the MC provides detail to their client the MP who then passes that on to their client the Energy Retailer, but the vast majority of the

time there is no communication to the Solar Retailer or end user on what the reason for the UTC is and what needs to be done to rectify it by the Solar Retailer or Electrical Contractor.

Communication

There is a lack of communication or visibility from Meter Providers and Energy Retailers to customers, registered electrical contractors (REC's) and Solar Installers around the process of installing/ commissioning a new meter.

The timing of the meter installation plays a vital part in when a customer can commence using their solar system. We are seeking your assistance in:

- a) improving this experience for the customer as an end user; and
- b) improving experience and reducing costs that have arisen since both the changes to the metering framework which introduced competition in metering and in recent regulatory changes in SA from Sep 28 2020 relating to metering involvement in remote disconnect/reconnect. These additional costs were previously not existent and are now additional costs to the SME Electrical Contractor or Solar Retailer

Solar installers are required to have commissioned the solar system and its online monitoring system prior to installation of the new smart meter. From a customer perspective they are the point of contact for:

- a) Ensuring the meter installation is complete, and
- b) Ensuring that the solar system monitoring is online after the meter is installed and the advice received is that retailers, metering coordinators and meter providers are providing limited communication to customers, solar installers and electricians on the specifics of when the meter will be installed and what may need to be rectified to ensure its completion.

These communication gaps that were not present prior to metering contestability (given the REX online portal provided transparency on progress) are leading to wasted visits to site, delays for customers having their meter installed and a delayed ability to use their solar systems due to the meter not being installed.

It is the Electrical Contractor or Solar Retailer who is by virtue of customer expectation being made accountable for the metering process without control or transparency on the metering process themselves. This is what we seek to improve.

Process

There is a lack of consistency in the process to get a meter installed as currently each energy retailer has a process which is specific to their business needs which has flow on impacts to solar installers, electricians and customers. Customers are impacted as they are engaging the electrician / solar installer to manage the process for them, however, energy retailers will not

interact with their electrician / solar installer due to privacy concerns forcing the customer to then have the interactions without knowing the technical components required by the retailer for the new meter installation.

When a retailer is willing to interact with an electrician / solar installer or the customer, each energy retailer has their own process to request a new meter. The process for managing the end-to-end transaction of requesting a new meter differs from retailer to retailer as there is nothing within the framework which requires them to have a consistent approach.

The process for requesting a new meter for each retailer is established on the commercial viability for that participant which leads to multiple different processes being required to be followed by customers, solar installers and electricians. A singular approach for all retailers would simplify the process, save money for the businesses involved and ultimately lead to a better and more cost-effective customer experience.

Industry survey and feedback

A webform survey was sent to all registered solar installers in South Australia, NECA and MEA to provide industry feedback to support this submission to quantify the impact of the current metering process in SA. Feedback was sought from the industry on the types of metering technical, process or communication events that resulted in either a poor experience, a cost to the consumer or small business supporting them and/or cost or administrative work by SA Power Networks. It should be noted that these views and costs have arisen since the changes to the metering framework, which introduced competition in metering.

In summary:

- A total of **41** submissions were received.
- On average metering issues that have arisen since the transition to contestable metering and after introduction of remote disconnect/reconnect regulations as of Sep 28 costs small business **\$25,143 per annum**, with the maximum impact to small business being \$90,000 per annum.
- Total number of customers impacted negatively in the last 12 months across the 41 businesses that responded was **15,929**.
- The average number of staff hours spent per metering issue in arranging connection (over and above what should be required) was estimated at an average of **6.5** hours.
- The average cost per metering issue in arranging connection (over and above what should be required) was estimated at an average of \$2225.90 with a minimum of \$110 and a max recorded of \$25000 per event (an outlier but a clear example of financial loss)
- Of the 41 examples the solar retailer or electrical contractor, despite the issue being of no fault in their own process, 42% of these occasions resulted in whole or part of payment being withheld.

Overview of metering issues identified through industry feedback:

Issue	Responses	Discussion
Role in metering process and survey respondent	<ul style="list-style-type: none"> • 35% electrician at Electrical Contractor • 27% admin staff at Solar Retailer / Installer • 18% electrician at Solar Retailer / Installer • 20% admin at Electrical Contractor 	
Metering issue	<ul style="list-style-type: none"> • 48% of respondents problems were caused by issues as a result of changes Metering Contestability Rules (2017) • 27% of problem caused by issues due to changes to Remote Disconnect/Reconnect Regulations (Sep 28 2020) 	Approx. Half of respondents felt the process was working before Metering Contestability changes
Type of metering activity	<ul style="list-style-type: none"> • 26% related to solar installation • 22% temporary Isolation (disconnect/reconnect) SA Power Networks appointment requiring metering company to attend same day so SA Power Networks can reconnect power after meter changed • 21% alteration of service provision • 15% standard meter change • 15% new service provision 	Over a quarter of metering issues were solar installations
Stakeholder	<ul style="list-style-type: none"> • 80% of respondents identified the energy retailer (42%) and the metering contractor engaged by the energy retailer (40%) as the stakeholder responsible for causing the issue or non-performance of requested work • 11% identified SA Power Networks • 5% the solar installer/ contractor 	There is a lack of communication or visibility from Meter Provider's and Retailers to customers which could be resolved through a central database accessible to all stakeholders.
Reason for non-completion of works despite solar and/or meter box configuration being compliant	<ul style="list-style-type: none"> • 9% of jobs were not completed as a result of the metering company not attending the site at arranged date/time. • 10% of jobs non completed were a result of the metering installer stating that meter box was non-compliant, but installer have confirmed it was. 	Approximately 50% of jobs not completed were a result of poor communication and visibility between all parties involved in metering.

	<ul style="list-style-type: none"> • 8% metering installer attended site before the requested date the retailer advised that the meter Isolator would be installed. • 9% mismatch between databases Retailer/SAPN/Council. • 8% information not provided regarding confirmation of meter installation date 	
Negative outcomes to business	<ul style="list-style-type: none"> • 33% noted a negative impact on brand a loss of face with their customer • 33% felt there would be a loss of future work with their customer • 33% other 	The current process results in negative outcomes for customers which impacts on solar and electrical contractors.

Solutions

Survey respondents were provided with several options to improve the current metering process within South Australia. The options were developed by the Connections Working Group. In addition, survey respondents were also provided with free fields to make any open suggestion that they deemed a good solution

- 55% of respondents felt metering should be handed back to SA Power Networks to manage via the REX portal as was done before Metering Contestability in 2018.
- 45% of respondents felt metering should be managed via REX portal or similar single point online portal for all retailers and Metering Providers so all parties have transparency on process and timeline.
- 100% of survey respondents supported a central database accessible by authorised stakeholders to minimise double entry of data, maximise efficiency and negate issues relating mismatch of customer data between stakeholders.
- 45% of respondents felt the issue would have been resolved if the electrical contractor was able to obtain and install the meter themselves (as per the NSW model).

Opportunities

There is an opportunity to establishing simple solutions that will ensure REC's and Solar Installers are across key communications from Meter Providers and Retailers to customers relating to meter installation dates.

Solutions could include:

- Template addressed to the retailer(s), signed by the customer, providing the REC/installer permission to obtain details on the account
- Email correspondence to the REC/ solar installer on progress/ date of installation/ date of completion.
- A central database accessible by authorised stakeholders

100% of survey respondents supported a central database accessible by authorised stakeholders to minimise double entry of data, maximise efficiency and negate issues relating mismatch of customer data between stakeholders.

Recommendation

The metering sub-group of the Connections Working Group request that the AEMC engage with key players in the South Australian market to look at simple solutions to improve the metering framework. Solutions range from a simple template or email to a central database accessible to all stakeholders.

We are willing and able to meet with the AEMC to outline our issues and develop a proposal to improve communication between all parties (energy retailers/ metering providers/ solar and electrical installers and contractors/ SAPN) involved in metering to ensure industry needs are understood. The need for a coordinated system accessible to all parties to improve communication was highlighted through our survey of electrical and solar installers.

To ensure input into the framework going forward, we would like to nominate Mr Ben Lovell, Managing Director at Living Energy (Ben@livingenergy.com.au), to sit on the AEMC Reference Group to be established.

Attachment 1: Metering survey advertisement

Member News

Be Aware. Be Compliant. Be Supported. Be Safe.



SA: Have your say on metering changes

SA Power Networks is calling for electrical contractors to take part in an online survey to help identify problems with the present system of requesting metering changes on behalf of customers.

The Australian Energy Market Commission announced a national Metering Review in late 2020 and is seeking industry input.

SA Power Networks Connections Working Group have identified a lack of communication or visibility from Meter Providers and Retailers to customers, registered electrical contractors and solar installers regarding when new metering will be installed when the application does not relate to a new service provision or alteration of service provision.

[Read more on the AEMC's Metering Review](#)

The survey asks respondents to describe and classify types of events for the businesses supporting an end user, and the end user themselves, that resulted in either a poor experience, costs to the consumer or small business supporting them and, or cost or admin work by SA Power Networks.

The survey will be open for feedback until 5pm ACDT on Friday, 22 January.

[Access the survey here](#)

While SA Power Networks Working Group is leading this data collection, the review it is open to all members across the country to comment and provide feedback. Given AEMC is a national body all data regardless of state is relevant to this issue.

Dear

AEMC Review into Metering - We Need Your Help!

In late 2020, the [AEMC announced a Metering Review](#) seeking stakeholder input on the regulatory framework.

As members would be aware, NECA SA/NT have been working through the metering contestability changes since they began in late 2017 to provide a voice for our members to all stakeholders. Furthermore, we have now joined the SA Power Networks Connections Working Group (CWG) who have been focused on the metering process since 2019, and in 2020 a metering sub-group was established to identify opportunities for improvement within the current framework.

Despite improvements following the AEMC's Metering Installation Timeframes rule change in February 2019, the metering sub-group identified a lack of communication or visibility from Meter Providers (MPs) and Retailers to Customers, Registered Electrical Contractors (RECs) and Solar Installers.

The AEMC Metering Review provides us with an opportunity to lodge a formal submission to the AEMC outlining the issues inherent in the current metering process. Submissions are due by 11 February 2021.

To support the development of this submission, the CWG has designed a survey for South Australia's RECs and solar installers and is being distributed to all RES/SEG users and NECA/MEA members/potential members to seek feedback on your experiences to support the submission.

The survey asks respondents to describe and classify types of events for the businesses supporting an end user and the end user themselves, that resulted in either a poor experience, costs to the consumer or small business supporting them and/or cost or admin work by SA Power Networks.

Please fill in the survey by clicking the link here >> [Metering Survey](#)

The survey will be open for feedback until **COB Friday 22 January**. We apologise for the short timeframe but require feedback to feed into the AEMC review process.

Thank you for your input and hope this assists in reshaping the metering process in South Australia.

Please contact [Leah Boyce](#), Business Relationship Manager at NECA SA/NT on (08) 8272 2966 if you have any queries about the above information.

[Access the Survey >>](#)