

28 October 2021

Australian Energy Market Commission
GPO Box 2603
Sydney South NSW 2001

Submitted via AEMC website

Dear Alisa,

EM00040 – Review of the Regulatory Framework for Metering Services – Direction Paper

PLUS ES welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (**AEMC**) Direction Paper - Review of the Regulatory Framework for Metering Services – EM00040.

PLUS ES is a registered Metering Co-ordinator (**MC**) and an accredited Metering Provider (**MP**) and Metering Data Provider (**MDP**) in the National Electricity Market (**NEM**). Our skilled, internal workforce provides metering services across Australia. Our customers range from small residential customers through to Australia's largest manufacturers and mining operators.

PLUS ES feedback on the below key points are:

- Accelerated smart meter rollout pace – we support initiatives that will help accelerate the pace of smart meters across Australia.
- Removal of barriers so customers and participants can realise the benefits of smart meters – we recognise that the benefits of smart meters have not been fully realised by customers and participants. As the number of smart meter deployments increases, we expect further investment across the industry that will allow these benefits to be realised.
- Cost recovery – MCs and other stakeholders should be allowed to earn a fair return on any investment in smart meter services. This will help encourage innovation and deliver further benefits to customers.
- Access to data – benefits realised from accessing metering data, especially Power



Quality (PQ) data, should incentivise an accelerated smart meter roll out. Competitive market forces and bi-lateral negotiations are expected to deliver the most equitable and efficient outcomes. Standardised data to meet identified use cases and requirements without limiting the use of bi-lateral agreements (where possible), however, could enhance operational efficiencies.

- Clarification of regulatory arrangements – in our submission, we outline several suggestions that will help to clarify provisions of the Rules, which in turn will contribute to further efficiencies for customers.

PLUS ES would welcome further discussions in relation to this submission. If you have any questions or wish for further discussion, please contact Helen Vassos on 0419 322 530 or at Helen.vassos@pluses.com.au.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Clark", written over a faint, light-colored signature line.

Jason Clark
Executive General Manager

PLUS ES feedback to the AEMC's Direction Paper questions

Questions	PLUS ES Feedback
1. BENEFITS WHICH CAN BE ENABLED BY SMART METERS	
<p>(a) Are there other benefits which can be enabled by smart meters that are important to include in developing policy under the Review?</p>	<p>In addition to the benefits listed within the Direction's Paper, PLUS ES would like to highlight further considerations that are important in developing policies under the Review:</p> <ul style="list-style-type: none"> • Mitigation of duplicate infrastructure and additional costs, where a similar or better outcome can be delivered via the smart meter. While other devices are capable of providing some of the benefits that smart meters enable, the smart meter has the advantage of being a single device that removes the need for market participants to invest in additional devices, duplicating infrastructure that will result in an increased cost to end customers. • Accurate measurement of billing grade consumption data and flexible demand control. <ul style="list-style-type: none"> ○ Smart meters accurately measure, control and monitor separately multiple sub-loads within a site, including essential load (general light and power) and flexible load (air conditioning, pool pumps). This gives consumers and Networks accurate insights into electricity usage for each sub-load, thereby enhancing customer choice to manage their demand. ○ Smart meters can support many levels of aggregation, potentially presenting a more cost-effective option than implementing additional devices, e.g. at an individual house/business connection point or at the aggregation of all flexible load and flexible generation within an individual house/business. ○ Smart meter can support the measurement and data requirements expected for Flexible Trader Arrangements as in the ESB Design Direction Paper¹ • Emergency shedding with underfrequency load

¹ <https://esb-post2025-market-design.aemc.gov.au/32572/1629945809-post-2025-market-design-final-advice-to-energy-ministers-part-b.pdf>

	<ul style="list-style-type: none"> • Monitoring compliance to Dynamic Operating Envelopes as per discussions in forums such as the Distributed Energy Integration Program (DEIP)² • Aggregation of customer load and availability of data that supports and benefits non industry participants and the wider community. This can be achieved at a lower cost and more efficient process with a select number of parties capturing and sharing the data, rather than with a large number of parties capturing and sharing the data across a plethora of devices. <p>Examples of non-industry participants and the wider community where the availability of data could benefit, include:</p> <ul style="list-style-type: none"> ○ Police and crime agency use cases ○ Broad research activities ○ Key demographic and behavioural data, i.e. ABS Census etc
<p>(b) What are stakeholders' views on alternative devices enabling benefits? What are the pros and cons of these alternative devices?</p>	<p>PLUS ES supports the view that the metering framework should not preclude other devices being utilised for specific services or outcomes that cannot be achieved through the smart meter. Example of services that should be precluded include consumption, billing, and settlements. Any alternative devices should also be capable of integrating with the smart meter to enhance further capabilities for ensuring data integrity and security.</p> <p>PLUS ES is concerned about the risks posed by uncontrolled growth of alternative devices and recommends that clear frameworks and standards are developed for such devices.</p> <p>Risks to consider include:</p> <ul style="list-style-type: none"> • Duplication of infrastructure and services – creates inefficiencies and increases overall industry costs. <ul style="list-style-type: none"> ○ Additional devices could potentially interrupt or increase the operational complexity of existing services supported by the meter ○ The risk of supply interruptions during device installation, particularly as the devices deployed become more complex

² <https://arena.gov.au/knowledge-innovation/distributed-energy-integration-program/dynamic-operating-envelopes-workstream/>

	<p>without appropriate standardisation</p> <ul style="list-style-type: none"> • Market Protocols (field co-ordination and communication protocols) – Lack of visibility of devices to the market operator or other participants with uncertain capabilities and response times leading to reduced market transparency. • Risk of cyber threat and data security – A proliferation of a diverse range of devices increases the risk of inadequate security measures and the number of access points for security breaches, all of which threatens Network safety, reliability, and data security. • Compliance to NEM accuracy standards – additional devices must meet minimum accuracy and reliability standards, as applicable for smart meters, to avoid any disputes if data is used for billing purposes. • Safety risks – new devices introduced into the Australian market should be compliant with Australian safety standards at minimum, especially when safety track records may not be available • Supply logistics – assuring that the demand can be met via the supply chain, i.e from the manufacturing design phase through provisioning to the customer. • Access and physical control issues at site – a major immediate operational impact which will drive up costs, as there’s currently limited physical space at the switchboard/meter panel. <ul style="list-style-type: none"> ○ Additional devices may require a switchboard replacement which would incur additional costs for the customer. ○ Further complexities in managing the assets of the electrical infrastructure on the switchboard. That is, meter installation, removal, switchboard replacement costs etc.
2. PENETRATION OF SMART METERS REQUIRED TO REALISE BENEFITS	
<p>(a) Do stakeholders agree that a higher penetration of smart meters is likely required to more fully realise the benefits of smart</p>	<p>PLUS ES supports the view that a higher penetration of smart meters is required to fully realise the benefits of smart meters. The current pace of roll out is insufficient to achieve these penetration levels within a reasonable timeframe.</p> <p>PLUS ES also agrees that the penetration needed to provide services that underpin market and customer benefits varies according to many</p>

<p>meters? If so, why? If no, why not?</p>	<p>variables.</p> <p>While many market benefits can be realised at lower levels of penetration, individual customer benefits and ensuring that no customers are left behind or disadvantaged, should be the driving focus of the smart meter roll out.</p> <p>Each customer regardless of location, consumption, or circumstance (e.g. installing a PV system) should have access to a smart meter installation to realise the safety and cost-efficient benefits.</p> <p>The equity gap that exists between consumers that have smart meters against those that do not will with an accelerated roll out.</p> <p>For this purpose we believe the AEMC should seek to deliver 100% penetration within a reasonable timeframe.</p>
<p>(b) Do stakeholders have any feedback on the level of smart meter penetration required for specific benefits? Or to optimise all benefits?</p>	<p>PLUS ES' position is that the penetration of smart meters in the NEM should be at 100% by 2030 at the latest. For clarity, this means all Type 5 and Type 6 meters should be replaced by 2030 to bring forward the benefits of smart meters.</p> <p>This accelerated penetration rate will allow for market benefits across different participants to be accrued sooner through the transition.</p> <p>AEMC should be guided by the principle that no customers should be left behind or disadvantaged by an incomplete or slow-paced roll-out.</p>
<p>3. TO REACH A CRITICAL MASS IN A TIMELY MANNER, OPTIONS TO ACCELERATE THE ROLL OUT SHOULD BE CONSIDERED</p>	
<p>(a) Do you consider that the roll out of smart meters should be accelerated? Please provide details of why or why not.</p>	<p>PLUS ES supports the acceleration of smart meters, particularly to reach 100% penetration by 2030 (as per our response to Q2. (b)).</p> <p>Extrapolating the current run-rate indicates that the smart meter roll out would be complete around 2040 (a further 20-years of deployment).</p> <p>Acceleration of the smart meter rollout is necessary to:</p> <ul style="list-style-type: none"> • Maximise the number of meter installs at lowest cost; this occurs when all spare economic capacity with regards to meter manufacturing, logistics, install and maintenance is maximised. • Incentivise innovation and enable market forces to support the capital expenditure • Support the industry policies and reforms which have been initiated

	<p>or proposed by enabling the replacement of mechanical assets with smart metering assets. i.e. Energy Security Board’s review paper, Distributed Energy Resource activities.</p> <ul style="list-style-type: none"> • Bring forward market-based benefits, particularly for Network management and monitoring. • Bring forward individual customer benefits and ensure customers are not left behind or disadvantaged.
<p>(b) What are the merits, costs and benefits of each option? Is there a particular option which would be most appropriate in providing a timely, cost effective, safe and equitable roll out of smart meters?</p>	<p>PLUS ES believes an effective acceleration program will require elements from each of the AEMC options. A well-designed acceleration program should remove inefficiencies in the installation process and incentivise Retailers to actively support the program (Option A) whilst providing compliance mechanisms to ensure Retailers complete the roll-out efficiently and equitably (Options B and C) by a target completion date (Option D).</p> <p>Of the 4 options presented, PLUS ES predominantly support the setting of incremental targets in Option C as an unambiguous and consistent framework to ensure a timely, safe and equitable roll out of smart meters.</p> <p>The merits and disadvantages for each of the options are:</p> <p>A. Improving Incentives: Improving incentives to roll out smart meters by removing inefficiencies in the installation processes, improving cost sharing, and aligning incentives</p> <p>This option alone will not achieve the desired rate of smart meter roll out acceleration. Elements such as removing inefficiencies in the installation process should underpin the acceleration of smart meter roll out objective, irrespective of which option/combination of options are agreed on.</p> <p>Providing incentives to Retailers based on broader industry benefits accrued by other market participants is a way to share some the installation costs and reduce the Retailer burden.</p> <p>While PLUS ES consider that Retailer incentives have merit, it is important to note that the incentives should be separate and not result in any dilution or reduction in current meter annuities agreed in bi-lateral contracts between Retailers and MC. A reduction to</p>

	<p>existing annuities could force some meter providers to exit the market, resulting in reduced competition which could negatively impact the price, innovation and speed of the roll out.</p> <p>B. Age Limit Replacement: Requiring meters to be replaced once they have reached a certain age, for example 30 years, under an aged replacement roll out</p> <p>PLUS ES supports the premise that Network aged assets should be subjected to a mandatory Aged-Asset replacement. Some of the benefits include:</p> <ul style="list-style-type: none"> • Enables forecast planning from parties involved driving operational and cost efficiencies • Enables the DNSP to potentially deliver further efficiencies for their Network maintenance by requesting strategically beneficial meter replacements • When implemented in conjunction to Option C, this could help to guide roll-out prioritisation <p>To enhance this option, consideration should be given to:</p> <ul style="list-style-type: none"> • Reducing the age limit if the proposed targets are to be met • Geographic overlays to increase efficiencies. • Mechanisms to ensure the roll-out is completed within a set timeframe e.g. annual installation targets (Option C) and/or “back-stop” dates (Option D) <p>C. Setting targets for the roll out under which a Retailer (or the responsible party) will be required to replace a certain percentage of their customers' meters with smart meters each year:</p> <p>This option has the benefit of being a clear and transparent framework that allows for a flexible approach which could be used to target certain categories of meters or geographical locations to ensure the ramp up and distribution of smart meters does not skew towards, or cherry pick any customer groups.</p> <p>Annual targets will also be essential to support any backstop date mechanism to ensure Retailers do not defer and rear-load their meter roll out programs, which could lead to resourcing bottlenecks</p>
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	<p>and subsequently drive up deployment costs and extend the roll out timeframe. Solution to this could include:</p> <ul style="list-style-type: none"> • Provide specific targets to obtain a more equitable deployment of smart meters e.g. such as metro vs rural, equitable distribution of smart meter volume (%) between DNSPs, • Optimise installation efficiencies through geographical targets • Enable a more consistent rate of deployment to mitigate against resource constraints <ul style="list-style-type: none"> ○ Allow service providers to collaborate with Retailers with respect to the scheduled roll out ○ Allow Retailers to plan their programs and implement meter provider contracts to match MC/MP capacities • Any roll out targets need to be visible and transparent across the industry to plan appropriately and engage suppliers and service providers with a forward view to drive efficiencies. That is, enabling MC/MPs to plan field resources and materials ahead of time to optimise underlying cost structures. <p>D. Introducing a 'backstop' date: Introducing a 'backstop' date or dates by which time all accumulation meters or manually read interval meters must be replaced, for example 90% of meters required to be smart meters by 2030 or dates.</p> <p>PLUS ES believe a backstop date is a necessary mechanism to prevent any smart meter roll-out programs from being delayed indefinitely and denying some customers the benefits of a smart-meter.</p> <p>PLUS ES supports a target of 100% of meters to be smart meters by 2030.</p> <p>Annual targets are also needed to support any backstop date mechanism to ensure Retailers do not defer and rear-load their meter roll out programs, increasing cost and risk (see response to Option C).</p> <p>With the combination of annual targets and a backstop date, additional dates will not be required.</p>
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<p>(c) How would each of these options for rolling out smart meters impact the cost profiles of smart meters?</p>	<p>A. Improving Incentives:</p> <p>Aligning incentives alone will not reduce the cost of installing a smart meter. Removing inefficiencies in the industry supply chain will be necessary to reduce the smart meter installation cost.</p> <p>B. Age Limit Replacement:</p> <p>The acceleration of the smart meter roll-out driven partially by age-limit requirements on Type 5 and Type 6 meters and forward planning could provide increased bargaining power for MC/MPs to negotiate with meter suppliers.</p> <p>Additionally, a long term planned framework based on annual targets and ‘sub-targets’ allows better planning within the industry and gives MC/MPs greater certainty to plan across field resources, materials and other operational aspects.</p> <p>C. Setting targets:</p> <p>A long term planned framework based on annual targets and ‘sub-targets’ allows for forward planning within the industry. For MC/MPs, this would have the benefits of:</p> <ul style="list-style-type: none"> • Providing greater certainty to plan across field resources, materials and other operational costs • A potential reduction of costs through greater bargaining power to negotiate with suppliers. <p>D. Introducing a 'backstop' date:</p> <p>As a standalone option, this may have a perverse impact on resource availability and costs late in the program, due to the risk of Retailers rear-loading their meter roll out programs to defer capital expenditure. This option should be considered only in conjunction with a set of annual targets in Option C.</p>
<p>(d) Are there other options that you consider would better provide a timely, cost effective, safe and equitable roll out of</p>	<p>PLUS ES does not propose any other options.</p>

smart meters?	
4. OPTIONS TO ASSIST IN ALIGNING INCENTIVES	
<p>(a) What are the costs and benefits of each option? Is there a particular option which would best align incentives for stakeholders?</p>	<p>Aligning incentives to underpin an accelerated smart meter rollout is a complex task. PLUS ES recommends the following criteria as success measures against any of the considered options:</p> <ul style="list-style-type: none"> • Competition continues to thrive – no reduction • Costs do not increase • Innovation continues to be enabled – no barriers • Customer service is improved. <p>Development of additional revenue streams from smart meters.</p> <p>The benefit of this option is that it provides a simple, transparent mechanism to allocate cost.</p> <p>However, a regulated approach for the additional revenue streams will likely lead to inequitable cost outcomes between parties and reduce competitive tensions to provide additional services.</p> <p>A regulated pricing approach would hinder competitive market dynamics. As the industry moves towards additional revenue streams from data provided outside of current regulated market data, competitive forces between metering providers will shift cost towards parties that benefit from this data. This is already happening in the market today and could be stifled with a regulated pricing approach.</p> <p>PLUS ES welcomes the opportunity to further discuss with the AEMC.</p> <p>Spreading the cost of installation:</p> <p>As per above. As the industry moves towards additional revenue streams from data provided outside of current regulated market data, competitive forces between MPs will shift cost towards parties that benefit from this data. This is already occurring in the markets today and can be expected to equitably spread the cost of installation.</p> <p>Multiple parties responsible for metering</p> <p>PLUS ES does not support this option.</p> <p>Enabling multiple parties to be responsible for metering introduces further complexity in the market structure and will likely lead to cost duplication for the customer and a deterioration in customer service.</p>

	<p>Potential outcomes which may add to the complexity:</p> <ul style="list-style-type: none"> • Regulated pricing³ vs competitive pricing - ensuring the most competitive, cost-efficient option of metering is available to the customer • Demarcating the responsibilities of Retailers when they are not responsible for the metering of a customer • Ensuring contestable MCs have equitable access to jurisdictional or Network areas <p>Any options to accelerate the rollout of smart meters or improve data access should be done with a clear and concise framework. Increasing complexity will only increase cost.</p>
<p>(b) Are there other options that you consider would better align incentives?</p>	<p>Accelerating the meter rollout, enabling all data use cases that can be derived from smart meters and allowing market dynamics to align incentives will be the best approach to achieve a fair and low-cost outcome for all parties.</p> <p>As the roll out scales to a critical threshold where all data can be utilised, market dynamics will proportionally shift the cost of smart meters to parties that benefit.</p>
<p>5. THE CURRENT MINIMUM SERVICE SPECIFICATIONS ENABLE THE REQUIRED SERVICES TO BE PROVIDED</p>	
<p>(a) Do you agree with the Commission's preliminary position that the minimum service specification and physical requirements of the meter are sufficient? If not, what are the specific changes required?</p>	<p>PLUS ES supports AEMC's preliminary position that the smart meter minimum service specification and physical requirements are sufficient, as per the detail provided by MPs and smart meter manufacturers during the Review's various consultations and sub reference groups.</p>
<p>(b) Are there changes to the minimum service</p>	<p>The absence of a large-scale saturation of smart meters disincentivises downstream innovation until the market forces would</p>

³ When the DNSP (a regulated party), is responsible for the metering

<p>specifications, or elsewhere in Chapter 7 of the NER, required to enable new services and innovation?</p>	<p>support the capital expenditure.</p> <p>Presently there is a trade-off between the cost of the meter and providing an appropriate level of services. This does not translate to insufficient metering minimum specifications.</p> <p>Changes are required to Chapter 7 of the NER, at minimum to remove the inefficiencies identified during this Review and enhance access to metering installation data, to achieve an accelerated smart meter rollout and incentivise innovative activities.</p> <p>Further consideration needs to be given to:</p> <ul style="list-style-type: none"> • It should be made clear that collection, disclosure and use of Power Quality data is permitted under the <i>Privacy Act</i>, so that market and non-market participants have comfort that they can lawfully achieve the goals of the framework. • Retailer churn is a major risk for MPs, as not all Retailers are interested in offering the existing or new value-added services to support future proofing of meter hardware. That is, if the meter churns to a different Retailer, there is no guarantee that the additional services will be continued with the new Retailer. MPs may not be able to invest in future proofing meter hardware as there is a risk that additional cost of hardware/service may not be realised over the life of the asset.
<p>(c) What is the most cost-effective way to support electrical safety outcomes, like neutral integrity? Would enabling data access for DNSPs or requiring smart meters to physically provide the service, such as via an alarm within the meter, achieve this?</p>	<p>PLUS ES supports the utilisation of smart meters to provide greater safety outcomes to industry and end use consumers. We support that the most cost effective and efficient mechanism to support electrical safety outcomes, is the utilisation of data available from the smart meter and running back-office system driven data algorithms to perform analysis to identify actual or potential safety issues.</p> <p>While we advocate data provisioning as the most cost-effective solution, we also acknowledge other ‘in meter’ functionalities such as alarms could also identify electrical safety issues. For this purpose we suggest that the mechanism, data vs in meter functionalities, should not be mandated via regulatory frameworks.</p>
<p>(d) Do you agree smart</p>	<p>Typically DNSPs do not have visibility of their LV Network unless they</p>

<p>meters provide the most efficient means for DNSPs to improve the visibility of their low voltage networks? Why, or why not? What would alternatives for network monitoring be, and would any of these alternatives be more efficient?</p>	<p>deploy specific monitoring devices. The smart meter which is currently a regulated (minimum specification) asset mandated to replace Type 5/6 metering installations can provide that capability needed by DNSPs via the data collected.</p> <p>This is a valuable and beneficial outcome, not only for Networks but also for the industry as a whole, including the end use consumer. It is an important aspect of why smart meters should be rolled out in an accelerated manner.</p> <p>The Power Quality data collected by the smart meter is sufficient for DNSPs to gain better visibility of their LV Network. DNSPs could focus on 2 key aspects, which the smart meter can support:</p> <ul style="list-style-type: none"> • near real time data for immediate day to day operational and safety outcomes, and • aggregated historical data providing better baseline information to plan optimal maintenance programs. <p>As the DNSP benefits realisation are proportional to the smart meter penetration, the additional benefit of using the metering installation is that eventually post the completion of smart meter rollout, the DNSP should have access to data representing more than 97%⁴ of their LV Network.</p> <p>With the appropriate penetration levels, alternative devices for Network monitoring would be superfluous and costly burdening consumers with duplicate costs via DNSP redundant investment for no additional benefit.</p>
<p>(e) Can smart meters be used to provide an effective solution to emerging system issues?</p>	<p>Smart meters can be used to provide an effective solution to emerging system issues. The smart meter’s capabilities were evident in its utilisation in initiatives such as SA Smarter Home and the Smart Meter Backstop Mechanism trial conducted by AEMO in South Australia as evidence on how existing technology works in Australia⁵. No additional devices or components were required on the meter board for the smart meter to deliver an effective solution.</p>

⁴ It will be difficult to attain a 100% smart meter penetration of the meter population due to dependencies such as, network telecommunications and customer refusals.

⁵ <https://aemo.com.au/en/initiatives/major-programs/nem-distributed-energy-resources-der-program/standards-and-connections/reference-information>

	<p>PLUS ES advocates for broad frameworks to assist and underpin these initiatives through a planned and consistent approach across the NEM, rather than unrealistic jurisdiction-based activities and timelines that drive project costs up with unrealistic expectations and <i>fait accompli</i> engagement.</p>
6. ENABLING APPROPRIATE ACCESS TO DATA FROM METERS IS KEY TO UNLOCKING BENEFITS FOR CONSUMERS AND END USERS	
<p>(a) Do you agree there is a need to develop a framework for power quality data access and exchange? Why or why not?</p>	<p>Whilst PLUS ES believe the most efficient outcomes result from market forces and bi-lateral negotiations, we accept and understand that industry benefits, such as operational efficiencies, will be gained by the development of a standardised Power Quality data framework and exchange in conjunction with the proposed accelerated roll out of smart meters.</p> <p>Note that full market penetration from an accelerated roll out of smart meters is essential for other participants to experience the added benefit to the access of Power Quality data.</p>
<p>(b) Besides DNSPs, which other market participants or third parties may reasonably require access to power quality data under an exchange framework? What are the use cases and benefits that access to this data can offer?</p>	<p>PLUS ES has identified the below potential parties who may require access to Power Quality data.</p> <p>Market Participants – for customer service, billing, and similar reasons to DNSPs; monitoring Network stability and condition (in near real time or for optimal Network maintenance planning). Other market participants include:</p> <ul style="list-style-type: none"> • AEMO • Retailers • Embedded Networks Operators • Small market aggregators <p>Third Parties (Non-Market Participants) – Access to Power Quality data could enable innovation (developing/streamlining new technologies), mitigation of potential industry issues through implementing safeguards, medical research, etc. Examples of such third party groups include:</p> <ul style="list-style-type: none"> • End Use Customers: <ul style="list-style-type: none"> ○ Large Customer/Industrial

	<ul style="list-style-type: none"> ○ Small customers ● Manufacturers: <ul style="list-style-type: none"> ○ PV, Battery and Inverter Manufacturers ○ Electrical Equipment ● Brokers ● Researchers, i.e. universities ● VPP Operators ● Consultants (Industry/Engineering) <p>Any Power Quality Data exchange framework proposed should seek to enable MPs in providing the Power Quality data and third parties accessing the data. In order for the framework to function properly, it should address any <i>Privacy Act</i> barriers such as customer’s consent for the collection and disclosure of Power Quality data (to the extent, if any, that Power Quality data is personal information), whilst not compromising the customer’s privacy.</p> <p>In addition, provisioning of this data to third party non-market participants should be enabled via bi-lateral agreements.</p>
<p>(c) Do you have any views on whether the provision of power quality data should be standardised? If so, what should the Commission take into consideration?</p>	<p>To fully realise the benefits of an exchange framework for Power Quality data, the provisioning of this data should be standardised to the extent it meets the identified use cases and requirements without limiting the use of bi-lateral agreements. Standardisation of data to include:</p> <ul style="list-style-type: none"> ● Data specification ● A definition of the data - type of data ● Level of interval granularity (Likely to match the market at 5min), ● Delivery frequencies (likely to include a definition of [a] near-real-time, [b] daily to build a longitudinal historical dataset, ● Additional data access, such as ‘meter-pings’ and ● Delivery mechanism (existing market systems, new systems, bi-lateral interfaces) <p>The framework should be underpinned by the following principles:</p> <ul style="list-style-type: none"> ● A contestable MP must have the right to earn a commercial return

	<p>on the provision of data, as there are underlying costs. Not being able to earn a return could compromise the financial stability of MPs who would be left with a large cost impost.</p> <ul style="list-style-type: none"> • Data provisioning fees to DNSPs or other parties do not form part of the negotiated Retailer annuity fees. • Standardisation of Power Quality data would be applicable to all the meters of the DNSPs population and not provisioned by specific NMI/meter itemisation. • There should be no service levels attached to the provisioning of Power Quality data in the regulated framework, as it does not support billing or settlements. Additionally: <ul style="list-style-type: none"> ○ Anything more than the provisioning requirements (push-pull mechanism, with no validation) would add complexity and require additional system builds, incurring additional costs. ○ Any requirements to support a consistent national standard for data services should be captured as standards in the framework not as SLAs. ○ The provisioning of Power Quality data must ensure it should only be provided by assets that have been accredited to accurately measure the required information.
<p>(d) Do you consider the current framework is meeting consumers' demand for energy data (billing and non-billing data), and if not, what changes would be required? Is there data that consumers would benefit from accessing that CDR will not enable?</p>	<p>PLUS ES agrees there are opportunities to improve the current data provision framework to address some of the below points:</p> <ul style="list-style-type: none"> • The framework should more clearly differentiate between small and large customers – A large customer would have a greater demand for non-billing energy data requirements and different delivery frequencies. • The framework should clearly enable the MP to negotiate the provisioning of energy data and other data collected via the meter installation, with Market and Non-Market Participants and not be restricted by other market participants. • The framework should consider whether current market systems need to be updated to account for the needs of near-real-time data. • The framework should implement a clear payment mechanism for the MP and MC to be paid for providing regulated services, where

	<p>the end market participant obtaining the benefit of the services exercises market power to not sign a bi-lateral contract with an MC. In these circumstances, the MP and MC may be obliged to continue providing the services but will not be able to obtain payment from the end market participant for those services.</p>
7. FEEDBACK ON THE INITIAL OPTIONS FOR DATA ACCESS THAT THE COMMISSION HAS PRESENTED	
<p>(a) What are the costs and benefits of a centralised organisation providing all metering data? Is there value in exploring this option further? (e.g. high prescription of data management).</p>	<p>PLUS ES does not see value in further exploring the option of a centralised organisation providing all metering data. The costs of reforming the market structure to introduce more complexity and bureaucracy will outweigh any potential benefits:</p> <ul style="list-style-type: none"> • A centralised organisation represents another layer of bureaucracy, which will increase complexity of operation and consequently cost to serve • It introduces fundamental reform to the market – including the contestable MDP core – irrespective of the centralised platform performing the validation of metering data or the MDP passing through the validated metering data • It is likely to negatively impact all current market developed bi-lateral contracts and business value • Existing case studies indicate this model is unlikely to suffice for the Australian market. In the UK, where the model is used, the DNSP's collect half- hourly consumption data on a monthly frequency. Case studies from VIC DNSPs and non-VIC DNSP requests indicate this model would not suffice. This could result in outcomes that are not aligned with industry expectations, such as: <ul style="list-style-type: none"> ○ increased costs – mitigating any potential efficiencies or ○ a lower grade of service
<p>(b) What are the costs and benefits of minimum content requirements for contracts and agreements for data access to provide</p>	<p>PLUS ES supports the minimum content requirements option. We believe it is necessary to define the minimum content requirements to ensure all participants understand deliverables, the benefits and provide certainty around costs and pricing of data:</p> <ul style="list-style-type: none"> • Ensures the MP meets the DNSP data requirements to:

<p>standardisation? Would such an approach address issues of negotiation, consistency, and price of data?</p>	<ul style="list-style-type: none"> ○ Support near real time requirements for managing the Network and DERs and ○ Provision the data required for planning optimal Network maintenance activities. ● Assist in enabling the MP to provide the data required without being constrained by other market agreements or other participants.
<p>(c) What are the costs and benefits of developing an exchange architecture to minimise one- to-many interfaces and negotiations? Could B2B be utilised to serve this function? Is there value in exploring a new architecture such as an API-based hub and spoke model?</p>	<p>PLUS ES supports the development of an exchange architecture to minimise one to many interfaces and negotiations which mitigates additional cost burdens and drives further operational efficiencies. The exchange architecture is needed in conjunction with the Minimum Content Requirements.</p> <p>PLUS ES supports utilising as much of the current architecture as possible. For example, B2B transactions for Meter Pings would allow for the service to be recorded, monitored, priced, and billed under existing processes.</p> <p>Existing market architectures are proven, accredited, familiar and transparent to all participants, as well as enabling a high level of security.</p> <p>PLUS ES is open to exploring new exchange architecture solutions, particularly to minimise the number of interfaces that may be required, however there is a need to consider:</p> <ul style="list-style-type: none"> ● Transparency ● Standardisation and interoperability ● Security ● Costs to develop ● Costs to maintain ● Ability to price and bill the service via new exchange architecture (execute, monitor, report, invoice, and bill) ● The number of different APIs required ● Accreditation requirements, and ongoing audits <p>Ultimately the exchange architecture must meet the requirements of the Power Quality data provisioning including being quickly adaptable to the changing industry requirements.</p>

<p>(d) What are the costs and benefits of a negotiate-arbitrate structure to enable data access for metering? Is there value in exploring this option further? (e.g. coverage tests or non-prescriptive pricing principles).</p>	<p>PLUS ES supports the option of a negotiate-arbitrate structure. PLUS ES believes that any access to data within a regulated framework (as opposed to a bi-lateral contract) would require a process to resolve any access disputes between participants. A negotiate-arbitrate structure should be a component of a regulated framework enabling data access for metering and made available at the time of its implementation. We note that a dispute access framework will add costs to the business.</p> <p>Consideration is needed regarding the following aspects:</p> <ul style="list-style-type: none"> • Framework • Scope • Dispute cost recovery • The standing of 3rd party agreements or the hierarchy of authority • Pricing and cost principles (including sufficient Return on Investment (ROI)) • Roles and responsibilities
<p>(e) Are there any other specific options or components the Commission should consider?</p>	<p>PLUS ES have not identified other options at this time.</p> <p>In principle, PLUS ES supports a combination of options B, C and D for the reasoning provided against each option. PLUS ES remains open to consider other options identified.</p> <p>PLUS ES does not support the regulation of Power Quality and near real time metering data and price. If the determination is made that Power Quality and near real time metering data is to be regulated further, PLUS ES recommends the following are factored into the AEMC's considerations:</p> <ul style="list-style-type: none"> • Regulated Power Quality data should be kept to a minimum and limited to the predefined minimum data set necessary to satisfy the requirements of market participants. • Contestable MPs to earn a commercial return on their investments in the dataset provided • Standardisation of the Power Quality data • Provisioning through existing Market systems

	<ul style="list-style-type: none"> • Data provisioning fees should not form part of the negotiated metering annuity • Provisioning of regulated Power Quality data would be applicable to all the meters of the DNSPs population and not provisioned by specific NMI/meter itemisation. <p>PLUS ES welcomes the opportunity to further discuss the considerations above with the AEMC.</p>
8. A HIGHER PENETRATION OF SMART METERS WILL ENABLE MORE SERVICES TO BE PROVIDED MORE EFFICIENTLY	
<p>(a) Are there other potential use cases that third parties can offer at different penetrations of smart meters? What else is required to enable these use cases?</p>	<p>PLUS ES have not identified other use cases for third parties that require different penetrations levels.</p> <p>PLUS ES believes the penetration needed to provide services that underpin market, third parties and customer benefits varies according to many variables.</p> <p>While many market benefits can be realised at lower levels of penetration, the realisation of individual customer benefits and ensuring that no customers are left behind or disadvantaged⁶, should be the driving focus of the smart meter roll out.</p> <p>By striving for this penetration all other potential use cases by third parties should be met.</p>
<p>(b) Noting recommendations in incentives and the roll out, are there other considerations for economies of scale in current and emerging service models?</p>	<p>PLUS ES holds the view that specific targets and a back-stop date are essential for the success of an accelerated smart meter roll out program. In setting these mechanisms, the AEMC should be mindful of the following considerations:</p> <ul style="list-style-type: none"> • Adopting a consistent installation rate that avoids significant peaks and troughs • Scarcity of in-demand resources could drive increases of costs, e.g. availability of electricians etc • Specific targets to spread the benefits between different customer groups over the defined deployment period including up to the back-stop date/s (Geographic, social, customer type)

⁶ A customer being disadvantaged through no access to a smart meter or a slow/delayed roll out of smart meters

	<ul style="list-style-type: none"> • Tendencies for participants to defer programs to a later date (i.e. back ending the program).
9. IMPROVING CUSTOMERS' EXPERIENCE	
<p>(a) Do you have any feedback on the proposal to require retailers to provide information to their customers when a smart meter is being installed? Is the proposed information adequate, or should any changes be made?</p>	<p>PLUS ES supports the proposal for Retailers to provide standard and consistent information to their customers when a smart meter is being installed.</p> <p>Standard of information currently provided to customers varies across Retailers. Our experience is that customers that are better informed are less likely to object to the metering installation or inundate the MP with calls post the installation process on how to use/read the smart meter.</p> <p>Communication and understanding are a key link in the success of the program and more important if the ability for a customer to opt-out is removed.</p>
<p>(b) Should an independent party provide information on smart meters for customers? If so, how should this be implemented?</p>	<p>PLUS ES supports the option for an independent third party (e.g. Federal/Jurisdictional governments) to have a substantive role to play in promoting and empowering customers with knowledge on smart meters and their benefits, particularly as the roll out of smart meters is likely to contribute to several government goals, specifically decarbonisation and digitisation. This option, however, should not directly exert a cost burden onto the market participants.</p> <p>Smart meter adoption, understanding the benefits, reducing resistance, supporting energy efficiency, reducing carbon usage are all aspects that need to be better communicated to end consumers. The current gap in communications parallels the slow roll out of smart meters by Retailers.</p>
<p>(c) Should retailers be required to install a smart meter when requested by a customer, for any reason? Are there any unintended consequences which</p>	<p>PLUS ES agrees that an accelerated smart meter roll out plan should encapsulate Retailers making smart meters available to customers upon their request to replace their existing type 5 or type 6 meter.</p> <p>For clarity, if a site has a current functioning type 4 smart meter this meter should not be replaced at the customer's request, unless it is a meter upgrade (e.g. single phase to 3 phase, add load control etc.).</p>

<p>may arise from such an approach?</p>	<p>As a principle, the MP should be able to earn a ROI on their asset over the estimated meter life for which it has been deployed, otherwise a displacement fee is payable by the Retailer.</p>
<p>10. REDUCING DELAYS IN METER REPLACEMENT</p>	
<p>(a) Do you have any feedback on the proposed changes to the meter malfunction process?</p>	<p>PLUS ES supports most of the proposed changes in the meter malfunction process, especially differentiating meter malfunctions which are individually identified vs those identified via statistical testing.</p> <p>We propose the following recommendations are considered to deliver further efficiencies:</p> <ul style="list-style-type: none"> • Customer refusals – whilst these logically can be covered under access issues, there appears to be a regulatory gap on how to ‘encourage’ these customers to accept a replacement meter. The Rules make allowances for the DNSP to take remediating actions on the customer if their supply is not safety compliant or they do not permit access, the Retailer to disconnect customer if they do not pay their energy bills but remain silent on customers who refuse a smart meter replacement. • Retailer Customer Engagement - Retailers need to be incentivised to communicate with customers that stall the process of replacing faulty meters as part of a malfunctioning meter (individually identified or meter family failure program). Access needs to be arranged and granted and Retailers who have the customer relationship need to lead and assist in delivering compliant metering. • Meter Family Failures – The following factors could affect the 60 business days proposed timeframe. These factors would not fit within the proposed exception scope: <ul style="list-style-type: none"> ○ Large volume of meters over a condensed timeframe – Historical events have shown that even if 60 business days timeframe is allowed, there will be extenuating circumstances that the replacement timeframe will not be sustainable. The exception process would still need to cover the impractical situation of a large meter population, i.e. 100K meters requiring

	<p>replacement at the same time. There needs to be some accommodation for circumstances where large and unpredicted volumes of meter populations are sent to the MP for replacement – a fixed 60 business day timeframe would be unreasonable.</p> <p>Noting a large meter family failure program is likely to impact across the industry and all MPs at the same time.</p> <ul style="list-style-type: none"> ○ Resourcing – <ul style="list-style-type: none"> ▪ Availability of resourcing during specific timeframes over the annual calendar, e.g. Christmas shutdowns or skeleton staff available during public holidays, lack of resourcing in specific regions ▪ Economy of scale – competition of resourcing during large volumes of metering installation. Market forces – supply and demand – will result in scarce resources, higher costs and ‘peaks and troughs’ scheduling unless the program can be spread and dovetailed with other existing work. ▪ Control costs efficiently - a MP must work to avoid the unnecessary ramp up and ramp down of field operations, which is why flexibility is the key in metering deployment, allowing time for planning and scheduling with a forward view of work levels. This ensures the business can manage and negotiate effectively with partners and suppliers. <p>Meters identified as belonging to substantiated - via testing - family failures or to aged assets do not necessarily mean the actual individual meter is faulty or has failed. To drive further efficiencies and mitigate exception handling, PLUS ES proposes that the timeframe is extended to 120 business days or alternatively some parameters built in to enable deployment efficiencies while still delivering the customer outcomes.</p> <ul style="list-style-type: none"> ● Meter Malfunction Visibility - Identifying and informing participants of a meter malfunction – With the exemption process being proposed to be removed, PLUS ES supports that there are benefits in providing the visibility via MSATS that a meter has been identified as malfunctioning, the date identified and if there is an
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	<p>exception. This would mitigate administration handling and deliver industry efficiencies.</p>
<p>(b) Are there any practicable mechanisms to address remediation issues that can prevent a smart meter from being installed?</p>	<p>The current challenges of meter exchanges requiring site remediations can be categorised as follows:</p> <ul style="list-style-type: none"> • the scope of the remediation activity and requirements • the funding for the remediation activity • party responsible for carrying out the remediation activity <p>Additionally, there is the question of who should carry out the remediation activity.</p> <p>Challenge #1: Smart meter physically forms part of the electrical installation</p> <p>Smart meters – specifically direct connected meters, the majority of small customer installations – are physically part of the customer’s electrical installation. This is relevant because electrical infrastructure is a state/territory jurisdictional responsibility and not directly part of the National Electricity Rules. Anything to do with physically installing the meters falls into this jurisdictional regulation. As such the scope, remediation activities and requirements vary accordingly.</p> <p>Challenge #2: Presently, there is no effective incentive to upgrade an electrical installation:</p> <p>If the electricity consumer is not the owner of the electrical installation, they cannot influence the modification of the electrical installation to accommodate a smart meter.</p> <p>If the electricity consumer is an owner of the electrical installation, they are reluctant to spend money to complete remediation works on their electrical installation just to accommodate a smart meter, especially if they do not have visibility or awareness of the benefits a smart meter can enable.</p> <p>Statistics⁷: 32% of Australians rent and 9% of Australians live in multi tenancy sites. Based on this:</p> <ul style="list-style-type: none"> • 38% of electricity customers do not own the electricity installation

⁷ Sources: <https://www.aihw.gov.au/reports/australias-welfare/home-ownership-and-housing-tenure> and <https://www.aihw.gov.au/reports/australias-welfare/home-ownership-and-housing-tenure>

	<p>where the meter is installed, therefore cannot directly authorise any upgrade of the electricity installation.</p> <p>Finding the owner or convincing the owner to spend money to upgrade the electrical installation may be difficult and costly. Any frameworks should work pro-actively to prompt State tenancy laws to ensure landlords are responsible to:</p> <ul style="list-style-type: none"> ○ Have the tenancy inspected between rentals or by a backstop date to determine whether an upgrade for a smart meter is needed, and ○ if they need to upgrade to a smart meter then they need to do so by a backstop date or to do so before the tenancy is of lettable standard, so renters are not left behind as we move to increase penetration of smart meters in the market⁸. <ul style="list-style-type: none"> ● 62% of electricity customers do own their electricity installation – but may be reluctant to spend money on accommodating smart meters if it requires site rectification such as, upgrading the switchboard etc <p>PLUS ES provides options for consideration by AEMC, whilst acknowledging that some of the items are out of their remit:</p> <ul style="list-style-type: none"> ● Opportunity to create a ‘pseudo bucket’ for cost recovery by smearing costs across end users. <p>PLUS ES welcome the opportunity to further discuss site remediation arrangements with the AEMC.</p> <ul style="list-style-type: none"> ● More targeted assistance from the Government to fund site fixes and remediation for identified vulnerable customers. ● Introduce a jurisdiction-level regulatory framework to mandate and possibly also fund the upgrading of electrical installation up to the level that would allow the safe installation of a new smart meter. An Australian Standard could be developed to define a set of minimum Metering Installation Rules (replacing jurisdictional metering rules) that would guide minimum acceptable upgrade to the electrical installation that is required to accommodate the smart meter. The
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⁸ VIC has recently implemented something similar to the proposed - requiring landlords to incur Electrical Inspection every 2 years and ensure their tenants sites are Safety Compliant.

	<p>jurisdictional legislation would reference the Standard (similar to the way that AS3000 Wiring Rules are referenced) and would make such an upgrade as one of the obligations of electricity supply to that premise – whether the electricity infrastructure is owned by the landlord (for a single premise) or owned by the body corporate (for a multi-tenancy site).</p> <p>A jurisdictional mandate to upgrade the electrical installation to accommodate a smart meter, would also make it easier for the MP to successfully charge the Retailer for the upgrade work and easier for the Retailer to recover their customer expense</p> <ul style="list-style-type: none"> • DNSP funding could be created based on the benefits and value smart meters provide to the Network business. Some of this benefit funding could be transferred to Retailers to reduce installation cost burdens or fund site fixes and remediation for customers. • Another approach towards completing the meter installation on a site that has defects is to: <ul style="list-style-type: none"> ○ Complete the meter installation (if safe to do so) and ○ Issue the customer (and Retailer) a site fix/defect notice for the customer to fix the defects after the new smart-meter is installed. <p>This could work in conjunction with a tiered risk assessment framework. For example, “Level 1: Low Potential Risk, to Level X: Immediate and Present Risk – Meter not installed”</p> <p>PLUS ES strongly supports the MC/MP should be remunerated directly by the Retailer, for any remediation activities they undertake, irrespective of the party deemed financially responsible for the site rectification.</p>
11. MEASURES THAT COULD SUPPORT MORE EFFICIENT DEPLOYMENT OF SMART METERS	
<p>(a) Do you have any feedback on the proposal to reduce the number of notices for retailer-led roll outs to</p>	<p>PLUS ES supports the proposal to:</p> <ul style="list-style-type: none"> • reduce the number of notices for Retailer led roll out • reduce the timeframe for this notification to at least 15 business days prior to the meter exchange

<p>one?</p>	<p>PLUS ES proposes the following recommendations to facilitate further efficiencies given the expected volumes for an accelerated smart meter roll out:</p> <ul style="list-style-type: none"> Timeframe in the notification to allow for a deployment window, rather than a single expected date. <p>The benefits of the deployment timeframe window also apply to the Retailer Led deployment process. A timeframe window should be applied instead of an expected date which is currently interpreted as a single date.</p> <p>There are numerous factors which could impact the single schedule date i.e. scheduled technician falls ill, scheduled jobs took longer than expected, bad weather, etc. This would require contacting the customer or failing that, send the customer a new outage notification and delaying the metering installation by the appropriate timeframe for them to receive it.</p> Retailer Led Deployment timeframe window of 10 business days. <p>Applying a timeframe deployment window⁹ of 10 business days for the above-mentioned meters would deliver greater deployment flexibility. The benefits of this flexibility would drive greater efficiencies in the metering installation process whilst meeting customer expectations, as these meter exchanges would not be customer initiated. The ultimate outcomes being lower costs and better customer experience.</p> Incorporating customer Planned Interruption Notification into the Retailer notices for Retailer Led Deployments will increase efficiency of roll out programs, particularly where they geographically based programs.
<p>(b) What are your views on the opt-out provision for retailer-led roll outs? Should the opt-out</p>	<p>PLUS ES strongly supports AEMC proposal of removing the opt-out provision for Retailer led Roll out.</p> <p>We further support AEMC’s qualifying argument that the customer has the option to request the advanced communications disabled through</p>

⁹ Similar intent and modelling as the agreed 5 business day window of a customer initiated metering installation.

<p>provision be removed or retained, and why?</p>	<p>the Retailer (when they are fully explained the costs) before/after the smart meter asset installation. Opposition of advanced communications should not create a barrier for the smart meter asset to be installed.</p> <p>Customer communication plans and campaigns will be essential to support the removal of the customer’s opt-out provision. A more wide-spread understanding of the benefits of smart meters should mitigate a large portion of opt-outs.</p>
<p>(c) Are there solutions which you consider will help to simplify and improve meter replacement in multi-occupancy premises? Should a one-in-all-in approach be considered further?</p>	<p>There are opportunities to simplify meter exchanges at multi-occupancy premises. Multi-occupancy premises may or may not be impacted by shared fuse arrangements.</p> <p>Shared fuse:</p> <p>The MC Planned Outage rule changes offered to a degree a level of confidence with respect to an installation timeframe but did not deliver resolution or simplify the meter installation process, where the meters are impacted by a shared isolation point:</p> <ul style="list-style-type: none"> • There is still a reliance on the DNSP to schedule and co-ordinate the work (presenting its own challenges with visibility of dates, notification timeframes etc) • Potentially requiring numerous temporary isolations at the multi-occupancy premise, increasing costs and deliver less than optimal customer experience <p>PLUS ES would like to re-introduce the concept of a shared fuse arrangement at a minimum being resolved on the first site visit. This would require a service provider on the first group isolation installing a meter isolator on all meters that require it. Ideally, if the service provider is the DNSP they:</p> <ul style="list-style-type: none"> • Can provide the customer planned interruption notification as they are scheduling and effecting the outage • Have a customer agreement in place with all impacted connection customers <p>PLUS ES advocates that the ‘one-in, all-in’ approach would be the most efficient and cost-effective industry option to resolve for multi-occupancy meter replacements. In summary this would involve the</p>

	<p>MP identifying the multi-occupancy site, the DNSP effecting a group supply isolation on the site and the MP installing meter isolation devices and smart meters, as required. This approach would streamline and simplify the multi-occupancy premise meter replacement process and more importantly could be implemented in a faster timeframe. The benefits are:</p> <ul style="list-style-type: none"> • Whilst the MP is on site, they could exchange all the Type 5/6 meters of the multi-occupancy site¹⁰ <ul style="list-style-type: none"> ○ If a smart meter panel is required, this could be effectively managed by the MP ○ The DNSP would be effecting the supply interruption; they could notify all the impacted customers of the supply interruption, as all the customers would belong to the same DNSP. ○ The customers of the multi-occupancy would only have their supply interrupted once, rather than multiple times for the metering requirements of their neighbours. • Efficiency of scale, lowering costs of replacements for these sites, and accelerating the smart meter roll out • Minimised time delays, due to: <ul style="list-style-type: none"> ○ Reduced coordination effort as there aren't multiple MPs having to co-ordinate with multiple Retailers ○ DNSPS would only make one trip to the multi-occupancy site to conduct the temporary isolation <p>Certain pre-requisites need to be met before this approach can be enabled¹¹:</p> <ul style="list-style-type: none"> • Principles need to be developed and underpinned by regulations, relating to factors such as: e.g. <ul style="list-style-type: none"> ○ Customer notifications of outages ○ No objections/barriers from Retailers ○ Preventing a monopoly environment/being anti-competitive • Removal of barriers or clarifications - to provide the MP the details
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¹⁰ Dependency for MCs to have commercial agreements in place with the Retailers impacted at the multi occupancy premise.

	<p>they require to perform the task i.e. the impacted participants, life support sites etc – review of existing rules and/or market procedures</p> <p>For multi-occupancy premises with no fuse arrangements, the above proposal would apply without the meter isolation component.</p> <p>DNSP led installation of isolation devices:</p> <p>This option has some merit but does not deliver the most effective and cost-efficient outcome.</p> <p>The DNSP interrupts the supply: Since they’re scheduling and effecting the outage and have a customer agreement in place with the multi-occupancy customers, they could also deliver the interruption notification.</p> <ul style="list-style-type: none"> • They have a regulated mechanism for cost recovery. • Most likely the DNSP is the MC for the meter on site • The group isolation is resolved, lower costs to serve for the customers of the multi-occupancy and a better customer experience. • It could present a potential option for the DNSP to facilitate a shared fuse arrangement ‘roll out’ in addition to the requested temporary group isolations. <p>DNSP appointment of the MC for multi-occupancy sites:</p> <p>PLUS ES does not support this option as we believe it would add another level of complexity and administration in an already cumbersome process.</p>
12. FEEDBACK ON OTHER INSTALLATION ISSUES	
<p>(a) Do you have feedback on any of the other installation issues raised by stakeholders? Are there any other installation issues the Commission should also consider?</p>	<p>PLUS ES has the following feedback against the below identified meter installation issues.</p> <ul style="list-style-type: none"> • Changes to testing and inspection processes: <ul style="list-style-type: none"> ○ AEMO’s proposal: <p>5 year inspection cycle on CT metering installations – PLUS ES does not support the proposal for the below reasons:</p> <ul style="list-style-type: none"> • It is already similar to the existing NER requirements, (all Type 4 and Type 3<2GWh PA CT metering are already on a

	<p>5-year inspection cycle), which represents the vast majority of CT metering installations.</p> <ul style="list-style-type: none"> • The key benefit of the fixed inspection cycle is that it cannot be misinterpreted. • PLUS ES would add that if fixed inspection cycles are (re)defined, then it should only be applicable to large customers CT metering installations, reflecting risk management for larger consumption installations. <p>AEMO approved inspection regimes for WC metering installations – PLUS ES does not support the proposed requirements as to the below points:</p> <ul style="list-style-type: none"> • It reduces clarity for MP obligations, because the obligation is not known prior to AEMO’s interpretation. • WC metering represents the most significant (>90%) proportion of the metering installations and operate under an intense cost constraint. The proposal would introduce additional cost burden without the proportional benefits, especially for the remote read meters. <p>For these reasons, certainty in inspection obligations – as well as obligations that are appropriate and proportionate for the category of metering installation - is key to long term business viability and delivery of services to the customer. Inspection definitions that are open to interpretation and one-off approvals should be avoided.</p> <ul style="list-style-type: none"> ○ Intellihub’s proposal: <p>This proposal has merit as it removes an area of ambiguity for the inspection obligations for small customer metering installations by tying the inspection obligation to the meter accuracy testing regime which is better defined.</p> <p>PLUS ES would add that approved sample testing regimes are suitable for small customer metering installations (predominantly WC but includes small CT metering installation) because it is more reflective of the risk profile of the higher volume, but smaller electricity consumption metering installations.</p>
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	<p>Moreover, with communicating, smart metering, remote monitoring is available on all metering installations and is already being used to help confirm the correct operation of metering installations without the necessity of a physical visit.</p> <ul style="list-style-type: none"> The provision of industry keys to metering parties to enable Metering Providers to access meters <p>PLUS ES supports an industry led solution to the provisioning of industry keys to metering parties to enable MPs to access meters. Industry communications of this initiative has been poor. PLUS ES holds significant reservations that a successful solution will be achieved.</p> <p>As this issue has been tabled at industry for several years with no further resolution, PLUS ES is proposing for a framework to support MPs getting access to these metering installations.</p> Planned Interruption Notification: <p>PLUS ES is seeking further rule clarification for avoidance of any doubt as various interpretations exist with respect to which participant owns the planned interruption notification; especially as these clauses carry civil penalties.</p> <p>PLUS ES had the following understanding on the requirements:</p> <ul style="list-style-type: none"> The participant’s obligation was based on a Retailer planned definition and a DNSP planned definition. That is, if a supply outage was affected by the DNSP, the DNSP owned the requirement to notify the customer. <p>The direction paper’s preliminary comments state the following:</p> <p>If a customer meter replacement occurs that requires the DNSP to also upgrade the customer’s supply, this would involve a retailer planned interruption, and only the retailer should send a PIN in that case. If a DNSP is carrying out a distributor planned interruption for a number of affected customers on a shared fuse to replace any meters, then the retailer shouldn't send their customers a PIN as well.</p> <p>The challenge the above statement presents in practice is that there is a reliance on the DNSP who ‘owns’ the scheduling dates of supply interruptions to actually provide the date in ample timeframe for the Retailer to meet their obligation of providing their customer a notification with 4 business days receipt prior to the meter exchange.</p>
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	<p>In practice some DNSPs under certain scenarios will provide confirmation of scheduled dates within a timeframe of less than 4 business days of the supply interruption or not at all. It is almost impossible for a participant to meet their obligation when they have a dependency on another participant and presented with these outcomes.</p> <p>It has also been challenging to determine how individual participants define a DNSP planned interruption. Clarifications have been sought on numerous occasions since the obligations were introduced, including this Review.</p> <p>For avoidance of doubt and enabling efficiencies, PLUS ES proposes that in the instance where a DNSP needs to interrupt the customer supply, irrespective of Retailer initiated planned outage or DNSP planned outage, the customer notification obligation should sit on the party who is managing the scheduling of the supply interruption, effectively determining the date of the meter exchange. Additionally, PLUS ES proposes that an obligation is placed on the DNSP to notify the MP of scheduled supply outages (Retailer initiated or DNSP planned) via existing B2B market tools and within appropriate timeframes. These timeframes should at minimum allow for the MP to meet their obligations and/or schedule their resources for the metering installation.</p> <p>PLUS ES supports the clarification provided with respect to planned outage customer notifications, where a customer has engaged non-market participants. We recommend that this clarification is added to the Rules, for clarity and industry alignment.</p> <ul style="list-style-type: none">• Improved communications:<p>PLUS ES supports further efficiencies could be derived from further enhancing current communication requirements.</p><ul style="list-style-type: none">○ As already noted in the section above, the requirement for DNSPs to notify MPs of scheduled co-ordination dates via a B2B tools and in a timely manner (currently email and spreadsheet are used with no consistent timeframes)○ Whilst there is an existing B2B SO field, there are the following
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	<p>challenges which provide barriers or create inefficiencies:</p> <ul style="list-style-type: none"> • Visibility to scheduled dates • Initiators of the metering service order consistently acquiring and/or providing REC details <p>• Additional issues:</p> <ul style="list-style-type: none"> ○ MC Remote De-energisation/Re-energisation: NER Clauses 7.3.2(i)(2)(ii) & 7.3.2(i)(3)(ii) <p>For better alignment of market participants' interpretation, PLUS ES proposes that clarification is provided with respect to MC/MP being able to affect a De-energisation/Re-energisation service via the metering installation. That is, performing the action remotely or by physically visiting and engaging the meter.</p> <p>The use of the word 'remote' in the current wording of the clauses can be interpreted by market participants as 'over the air' only activity.</p>
13. IMPROVEMENTS TO ROLES AND RESPONSIBILITIES	
<p>(a) Are there any changes to roles and responsibilities that the Commission should consider under this review? If so, what are those changes, and what would be the benefit of those changes?</p>	<p>PLUS ES believes some changes to roles/responsibilities are needed to improve the consumer experience and reduce market inefficiencies. Opportunities the AEMC should consider under this review include:</p> <ul style="list-style-type: none"> • Appropriately enable participants to deliver on their regulatory compliance obligations and deliver better customer services. <p>There have been several instances where a MC was unable to comply with its obligations for reasons outside its control. This often results in delays, which ultimately impair customer experience and increases operational cost. For example:</p> <ul style="list-style-type: none"> ○ Meter Malfunction/Replacement – The MC is accountable for the meter replacement however is unable to directly liaise with the customer to facilitate the process as the Retailer owns the customer relationship. This means the MC is dependent on the Retailer and their internal processes on how it should proceed with rectifying the issue. Consequently, the MC could be hindered from replacing the meter due to reasons such as impaired site access or customer refusal. This is a growing market issue as contestable MCs fail to replace type 5/6 meters

	<p>and the site cannot revert back to the initial MC, leaving the site in limbo with no clear resolution.</p> <ul style="list-style-type: none"> ○ Business customers, with small market tail sites: Large corporate customers may have many small SME market sites in their portfolio (e.g. Franchises, Multi-site customers). When these business customers chose an MC for a large site or a group of sites it is always difficult to have the small market SME sites or tail site meters exchanged under the current regulations, as the Retailer chooses the MC, not the business. <p>Currently these large business customers are reliant on the Retailer making a nomination or commercially agreeing to allow a Direct Metering Agreement with a small market customer.</p> <p>Enabling the large business customer to nominate the MC for all their sites, including small customer tail sites, would drive a more efficient process and a better customer experience.</p> <ul style="list-style-type: none"> ● Combine MC and MP into a single market role. Presently, the NER defines the MC role separate to the MP role. The MC is responsible for asset management and to ensure the compliance of the metering and the MP is responsible for the installation and maintenance. ○ Combined MP/MC entities are the prevalent structure in the market. Due to the fact of two separate roles, however each entity is subject to two sets of auditing – one for each role -and two sets of market transactions (FRMP/LNSP/Customer nominates MC then MC nominates MP). This imposes extra, duplicative administrative burden on the entities and the industry. ○ Conversely, having the FRMP and the MC directly affiliated presents its own challenges with respect to market forces and negotiations, significantly impacting the MP and MDP. ○ When the MC and MP roles are different competing entities, the obligations of establishing contractual arrangements, dealing with asset management, ensuring compliance, and directing installation and maintenance can be problematic. There doesn't seem to be a benefit in the roles being separated.
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	<p>While PLUS ES has pursued Non-Aligned-Service-Provider contracts (NASP), competing entities are unwilling as it opens up significant commercial risks</p> <p>Reporting is problematic, for while the MC has the obligations and must report back performance to the Retailer, getting the data from non-aligned entities is extremely difficult. However if the roles were combined, these above issues would be eliminated and simplified – unlocking efficiency and improving compliance.</p> <ul style="list-style-type: none"> ○ Note - Keeping the MC and the MDP separate is still desirable and viable in a competitive model without the same degree of challenges experienced with the MP role. ● Whole Current metering – individual residential and small business metering (COMMS4D) represents the largest volume of metering installations. Because this metering directly forms part of electrical circuit supplying such customers and located at the junction between the customer and the Network, it forms an integral part of the supply connection. For this reason, it makes sense for the MP to have the same authorisation and access that would have otherwise been available to Network technicians who would have previously installed meters for the Network. The responsibilities could include: <ul style="list-style-type: none"> ○ Authority to operate Network isolation points upstream of the metering installation ○ Authority to install/replace upstream Network isolation / meter protection where safe to do so (appropriate controls in place for live work) ○ Authority for MP to initiate planned and unplanned supply interruptions as part of metering maintenance or emergency maintenance for single - or multiple customer sites with shared supply isolation <p>The above has parallels with the NSW ASP scheme, so streamlining this and updating the related regulations in other jurisdictions would help achieve the following benefits:</p> <ul style="list-style-type: none"> ○ “One-stop-shop” to facilitate a new connection or meter
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	<p>replacement</p> <ul style="list-style-type: none"> ○ Engaging the one entity instead of relying on the co-ordination activity of multiple entities <p>In parallel with this, streamlining of jurisdictional legislation and regulation to clarify the demarcation of the responsibilities of the Network and the MP at the customer premise.</p> <ul style="list-style-type: none"> ● Enable MC/MP to affect a planned outage: MC/MP would be able to interrupt supply of the customer who has requested metering work, as well as interrupting supply to any other electricity customers as required to enable the planned metering work to be completed. <p>Whilst this was consulted under the MC Planned Interruption rule change, there is value in re-visiting this concept, as it would further streamline the metering installation process, deliver improved customer service and reduce smart meter installation costs for the customer.</p>
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