REVIEW OF THE REGULATORY FRAMEWORK FOR METERING

METERING REFERENCE GROUP #7

20 JULY 2022



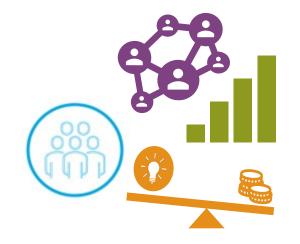
Before we start, an important notice: Compliance with Competition Law

- The Reference Group must not discuss, or reach or give effect to any agreement or understanding which relates to:
 - Pricing
 - Targeting (or not targeting customers)
 - Tendering processes
 - Sharing competitively sensitive information
 - Breaching confidentiality obligations

Each entity must make an independent and unilateral decision about their commercial positions.

Today's meeting: provide an update and getting feedback on some options

- Reference Group session: provides an update on the progress, and issues that are being considered
- **Sub-reference group sessions:** workshops to further develop options:
 - Multi-occupancy installations
 - Site remediation, and
 - Utilising the right exchange architecture for basic power quality data



Providing an update on the review and discussing solutions



1. Update on the Review's progress

Improving installation processes workstream update

- 2. Multi-occupancy 'one-in-all-in' approach
 - Resolving site remediation issues

Enabling services & data workstream update

- **3.** Basic power quality data service for DNSPs
 - Consumer access to data
- 4. Closing remarks and next steps

PROGRESS OF THE REVIEW

A reminder: the objective of this review, and the problem we are trying to solve



Objective of the review

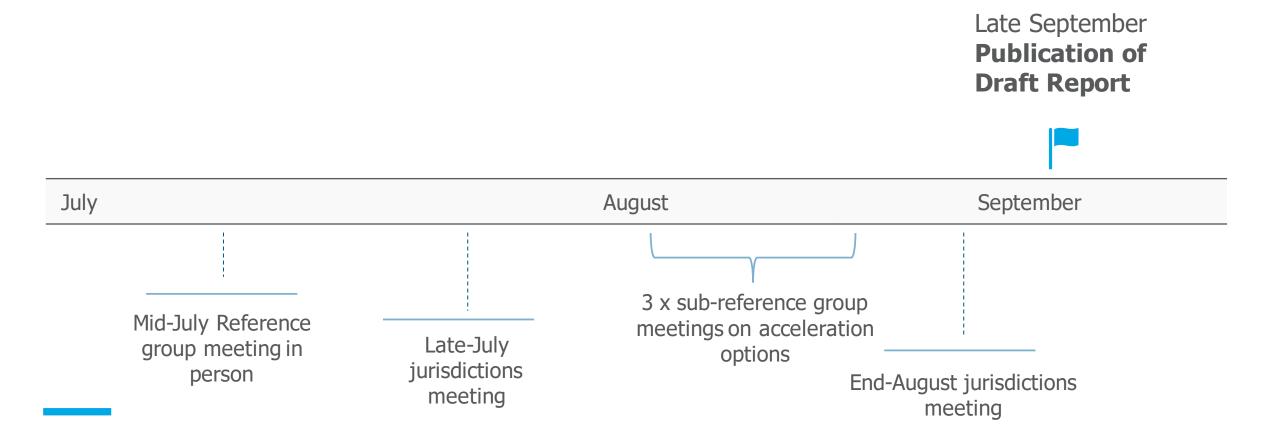
To enable the roll out of appropriately capable smart metering to consumers in a timely, cost effective, safe and equitable way, and to ensure metering contributes to an efficient energy system capable of maximising the benefits for all consumers



The problem statement

The current metering arrangements are not efficiently and effectively realising the key potential benefits that metering technology can enable for all consumers

Our project timeline has shifted back slightly, with a draft report in late September



Our Directions Paper set out four high level policy positions

Set a timeframe to achieve a higher level of smart meter deployment



Retailers and metering parties remaining responsible for metering services



DNSPs to support the rollout



Resolving key installation barriers

Most stakeholders support a clear direction to accelerate deployment with suggestions of their own

A universal roll out	An age-based	An end or target
with a timeline	replacement program	date for the roll out
A retail-led roll out target for a certain penetration of meters by a certain date	A coordinated roll out across areas with high DER or emerging network constraints	Expediting the roll out to certain groups or providing government funding

Our Draft Report: a preview

• Options and recommendations where relevant for each of the key policy workstreams:

	Measures to accelerate deployment	Improvements of installation processes		Services and data access framework
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Including implementation considerations and feedback earned from the August working groups and jurisdictional government meetings.

IMPROVING INSTALLATION PROCESSES

WORKSTREAM UPDATE

Outcomes sought before and after the pause

When we paused

- There is a general consensus for most of the preliminary recommendations in the Directions paper such as notification requirements, customer opt-out and information for customers.
- Some still require further consultation with stakeholders, including:
 - Timeframe obligations for family failures



When we restarted

We have been focusing on developing solutions for unresolved and more complex issues, including:

- Multi-occupancy sites with shared fusing in the complex and simple case for meter replacement
- Site remediation

ENABLING SERVICES AND DATA

WORKSTREAM UPDATE

Outcomes sought before and after the pause

When we paused

• Development of a framework to facilitate efficient data exchange between participants

• Improve consumers' access to billing & consumption data



When we restarted

- Agreeing the basic power quality data service:
 - Voltage, current, phase angle (power factor)
 - For import and export, per NMI, per phase, per element
 - Every 6 hours, aligned to market time
 - From all comms-enabled small customer type 4 meters.
- Consumer access to data:
 - CDR provides historical access
 - More real-time data needs to be made accessible
 - Privacy and consent arrangements

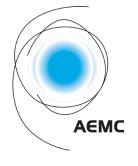
WHERE TO FROM HERE?

NEXT STEPS

- The topics discussed today will be considered for inclusion in the metering review's draft report.
- We have a full reference group meeting to communicate draft positions penned for the end of August.
- To get there requires engagement with reference groups and working groups.
- The project team will organise follow-ups to discuss issues related to today's topics and the collaboration required to get us to the draft report.



We'd like to hear from you about any ideas raised in today's meeting



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IMPROVING INSTALLATIONS PROCESSES

MULTI-OCCUPANCY SITUATIONS WITH SHARED FUSING



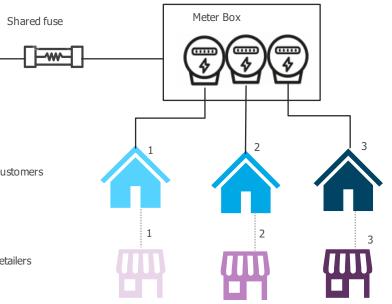
BACKGROUND A RECAP ON THE ISSUE

RECAP: what is the issue?

- For some sites, there may be one fuse for isolating supply to multiple premises
- Multiple meters usually share a meter panel

This leads to three main issues:

- Interrupting supply to replace one meter will interrupt supply customers to *multiple* customers that share the same fuse.
- Multiple parties are required to coordinate to ensure they are on the site at the same time for meter replacement
- Replacing meters on a piecemeal approach would lead to customers facing multiple supply interruptions



RECAP: what is the issue?

Issues

- Increased costs due to multiple visits
- Administrative inefficiency
- Negative customer experience, particularly from multiple planned outages, regardless of whether getting a smart meter or not
- A new meter may trigger a meter board replacement due to insufficient room
- Delays and a slow and inefficient process for meter replacement

Addressing the issues

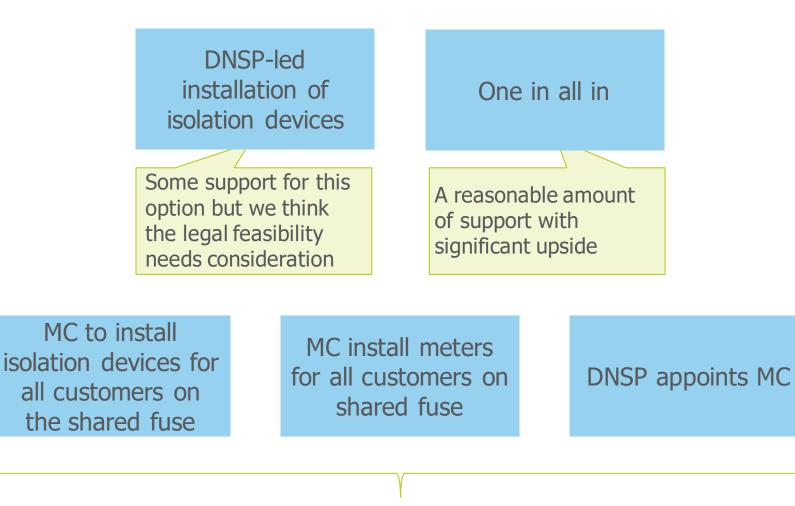
• MC-planned interruptions rule change partially addressed the problem but issues still remain

There are two priority goals in the installation process for shared fuse sites

- An ideal installation process for shared fuse multi-occ sites achieves the following goals:
 - Helps achieve acceleration of smart meter roll-out
 - Minimises interruptions of supply for customers
 - Reduces costs of installation
 - Minimises the number of site visits and delays
 - Complexity to implement

- Priority goals

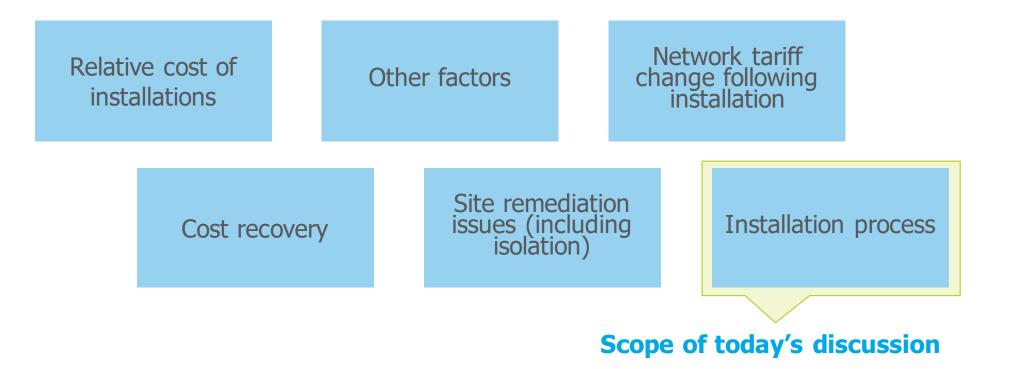
Before the pause, we presented a few options for efficient meter replacement in multi-occupancy sites



Valid but not feasible or unsupported

WORKSHOP STRESS TESTING ONE-IN-ALL-IN OPTION

Today, we are only focusing on the installation process



Some parameters to guide our discussion



Context

- Consider options in the context of an accelerated roll-out as the review is considering acceleration mechanisms
- Solutions should be suitable for scenarios with or without accelerated roll-out.

Parameters



- Roles and responsibilities under the current regulatory framework
 remain unchanged
- We are striving to achieve the objectives on slide 5

One-in-all-in: what does that entail?

Where shared fusing is found, all legacy meters on the shared fused are replaced with smart meters

Replacement to be conducted by each of the MP(s) appointed by the respective retailers in a coordinated way

This goal is for a faster meter replacement with the least number of outages for customers

One-in-all-in process flow

MC/MP

1

MP discovers a shared-fuse upon site visit and promptly informs its retailer

- 1. All or one MC attend the site during DNSP temp isolation and exchanges all the meters
- 5
- 2. MCs notify retailers of successful meter exchange

Retailer

Within 5 BDs Retailer informs DNSP of a shared fuse and raises a Supply Service Works (SSW)

Within 10 BDs

Retailers:

- 1. Appoint MC (Original or other) and raise service order to the MCs(s)
- 2. With the service orders date to be no earlier than 25 BDs from the MFN date .
- 3. Retailers would also have an obligation to replace meters after 25 but no later than 45 BDs of MFN date.

DNSP

Within 20 BDs

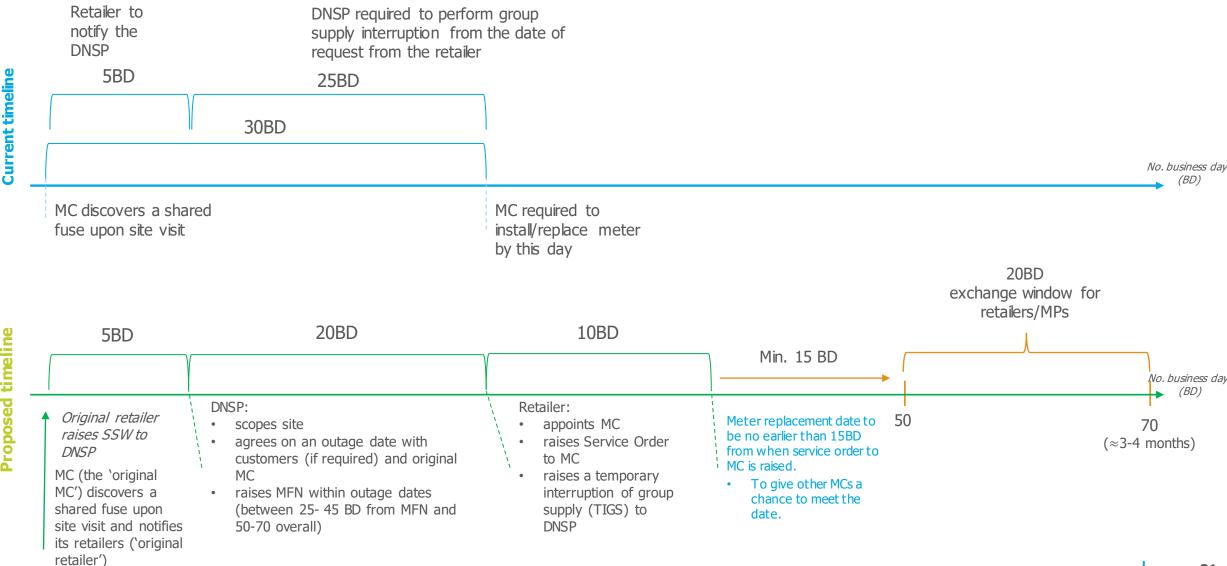
- 1. DNSP must visit the site and determine all affected NMIs
- DNSP in consultation with MC/customer sets the date and time of temp isolation – has to be between 25 to 45 BDs of MFN date
- 3. DNSP deems all NMIs on the shared fuse to have failed and issues a Meter Fault and Issue Notification (MFN) to each retailer

In the MFN, the DNSP also outlines who the original MC is and the date of temp isolation

DNSP effects a temporary planned interruption on the agreed date

Assume: there are **no remediation issues**

Timeline process view



Proposed timeline

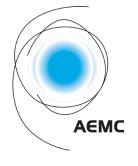
Some key points under this 'one-in-all' process

- Retailers can choose the 'original MC' or appoint their own.
- Retailers would be required to replace the meters within the 25-45 BDs from the MFN i.e. within the replacement window (\approx 3-4 months).
- This option encourages all meters to be replaced within one outage in the majority of cases potentially reducing costs to retailers.
- Simple and complex installations could potentially be accommodated as the replacement could occur between 30 BDs (at the quickest) and 70 BDs at the slowest.
- Site-remediation issues would likely be identified during step 1 and the process would continue if one-inall-in is deemed to be feasible without requiring substantial remediation.

We seek feedback on the 'one-in-all-in' approach for multi-occupancy sites

Discussion points:

- Would it improve the current installation process?
- Do you see any issues or gaps in the process flow?
- How can the process be improved?
- Do you think the proposed timelines on market participants are appropriate?
 - If not, what changes can be made and why?



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IMPROVING INSTALLATIONS WORKSHOP

SITE REMEDIATION



BACKGROUND

RECAP: What are customer site defects?

Site defects can be present in the infrastructure provided by customers, which is required to host the meter. Examples include:

	■7,	
Size and condition of the meter panel	Wiring conditions	Asbestos in board or meter and safety issues
	Examples	
Not enough room on existing panel(s) for installing smart meters or degraded board	In poor condition that it requires rewiring	Asbestos in the meter board

RECAP: Why do they occur? What issues do they cause?



This often leads to:

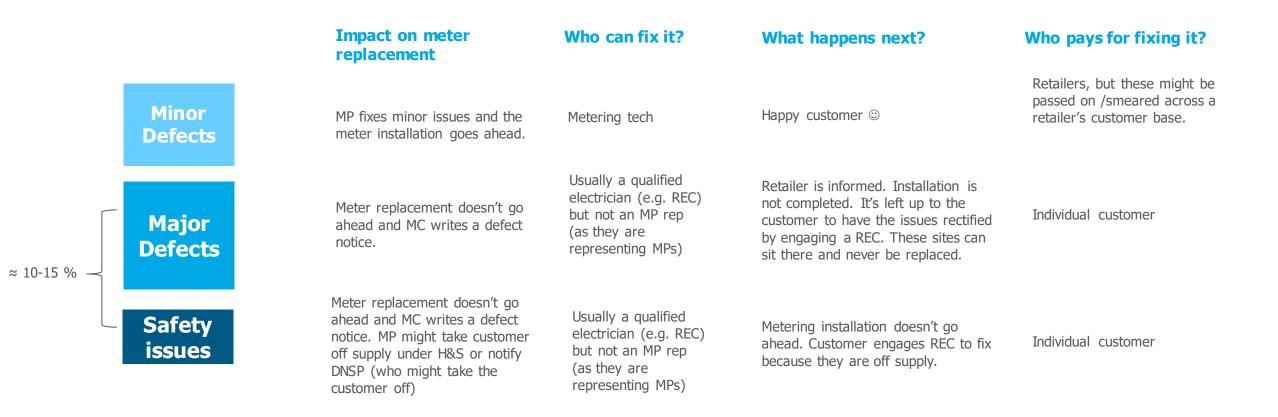
- limited success in customers undertaking remediation
- abandonment of meter replacements
- unexpected costs and delays for the customer

Stakeholder feedback has shaped today's discussion points

Several stakeholders urged for the site remediation issues to be progressed while noting the limitations of the national framework

- Stakeholder submissions noted that customer site remediation issues:
 - significantly contributed to meter installation delays
 - become more urgent under a programmed roll-out
 - were more pronounced for rental properties and family failures
 - are faced in approx. 10-15% of installs
- Stakeholder feedback suggested consideration of :
 - funding arrangements for site remediations
 - adjustments to the onus on customers to remediate
 - better information sharing

We understand the current site remediation process depends on the extent/type of the site defect



Problem statement



The main areas of concern are major defects category, as the metering installation can get stalled due to customers not remediating or taking a long time to remediate.

We believe the main reasons behind these remediations not taking place include:



Financial barriers: Individual customers need to pay – but there is limited willingness to pay, it may be a significant cost for some and there might be little benefit to the customer from having an advanced meter



Effort and incentive barriers: They rely on customers taking initiative to engage REC and fix it – they don't always have the vested interest to follow through



Additionally, the current arrangements may not allow for efficient management of site defects

MAP OF TODAY'S DISCUSSION

A key question: who should pay for remediation?

There are two foreseeable options for cost allocation of major remediation issues:



Costs are socialised

Key challenge

May not address financial barriers

May sit outside our control, so may or may not happen

Discussion mind-map

Cost socialisation may or may not be possible, so we need to discuss both possibilities

Scenarios	Today	How will customer access	
	How socialisation would	Who should be responsible for remediation to overcome	funding? [Another day]
ost-socialisation	effort/incentive barrier • Customer	 effort/incentive barriers? Customer Customer under greater obligations A "Nominated Party" 	What should be customer obligations? [Another day]
			Who could act as a nominated party? [Another day]
None or very limited cost- socialisation	What options are available? (Slides 16-17)		
With or without	How can we enable better handling of remediation issues?		
cost socialisation	 Greater information availability Better coordination (Slides 19-20) 		

COST SOCIALISATION

Cost socialisation may be desirable

Individual customer pays

This is what happens now. There are foreseeable challenges with this approach, especially under acceleration:

- Currently there is limited follow-through by customers. This approach without additional changes may not address the financial barriers.
- Under a programmed roll-out without funding, we could:
 - let the customer remediate (as now) the current approach may lead to a sizable proportion of the customers missing out on smart meters and delays in achieving the acceleration goals.
 - Explicitly exempt sites needing remediation, which could risk perverse incentives to defect sites and also not address minor defects. Although, there could be solutions.
 - Oblige customers to remediate to allow meter replacement - it could lead to adverse customer outcomes and backlash. Lighter obligations may be more feasible.

Costs are socialised

Costs of remediation could be socialised via:

- **Government funding or subsidy:** such as schemes to provide direct funding
- A centralised sinking fund recovered through
 - DNSPs
 - Retail Industry
- Requiring retailers to also fund major remediations
- Or some combination or variance of above e.g. Govt. established/administered and recovered via network charges

This **could lower financial barriers** for customers.

However, these arrangements don't currently exist for remediation costs. It may not be possible to establish these arrangements without changes to the jurisdictional frameworks and government support, both of which sit outside of AEMC's control.

But we want to hear your thoughts...

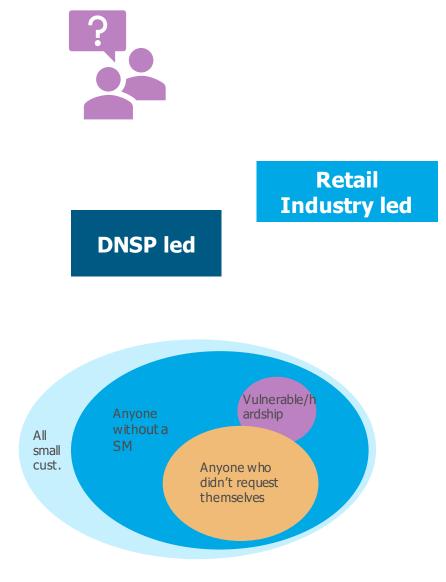
Discussion questions on cost socialisation

1. Under a programmed roll out, should remediation costs be socialised? If so, what is the most desirable way to do this?

2. If a centralised sinking fund was to be enabled, how should it work? E.g. who should administer the fund and recover costs from customers?

3. For which customers should the remediation costs be socialised? Examples could be:

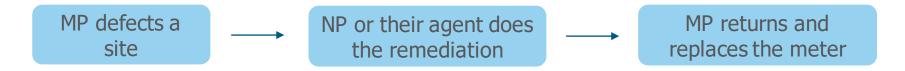
- vulnerable only
- all without a smart meter
- all without a S.M., except for customer-initiated meter exchanges e.g. to enable solar installations



Who should be responsible for remediating?

In the context of costs socialisation, e.g. a sinking fund, the responsibility for undertaking remediation could be as follows:

- A. Customer responsibility as now: This is the current scenario without additional obligations on customers. The customer or the REC would be eligible for claiming the costs against the sinking fund. This may also lead to a customer needing to pick an REC from a select panel.
- B. Enhanced customer obligations: Under this approach, the customer would have greater obligations to remediate their site to enable successful meter replacement under the regulatory framework. This may also need REC selection from a panel.
- C. A "Nominated Party" (NP) is responsible: This would mean a nominated party such as the DNSP, MP or Retailer is responsible for site remediation i.e. they do it on behalf of the customer where it is encountered. It is inspired by the VIC AMI roll-out to also address effort and incentive barriers.



Questions : Who should be responsible for remediating?

- 1. Do you consider that customer access to funding would be sufficient to resolve issues faced when dealing with customer site defects?
- 2. What are the strengths and weaknesses of each approach?

	A: Customer still responsible as now	B: Greater onus on customers	C: A nominated party should do it
Strengths			
Weaknesses			

3. Do you think it would be possible and efficient for the nominated party to also act as administer the sinking fund?

WITHOUT COST-SOCIALISATION

Clarifying or expanding customer obligations to remediate

If there are no feasible avenues to socialise remediation costs – options for site remediation could include:

- **1.** No change Up to the customer to choose to remediate
- 2. Better enforcement of customer's current obligations to remediate by the:
 - a) DNSP
 - b) Retailer
- 3. Clarification of a customer's current obligation to remediate in the regulatory framework
- 4. Expansion of the customers' current obligations to remediate

But there could be other ways...

Questions regarding : Clarifying or expanding customer obligations to remediate

- 1. If there are limited avenues to socialise remediation costs are there other avenues that could enable greater levels of remediation?
- 2. Would a "no change" approach be acceptable under a programmed roll-out?
- 3. Currently, there is a limited onus on customer's to remediate, is it due to:
 - a) Scope of obligations on customers being too limited?
 - b) Lack of clarity around when customers can be obliged?
 - c) Limited enforcement by Retailer or DNSPs?
 - d) Other reasons
- 4. What are the strengths and weaknesses of each of the options? Is there a preferred approach?

	1.No Change	2a. Better enforcement by DNSP	2b. Better enforcement by Retailer	3. Greater Clarity	4. Greater obligations
Strengths					
Weaknesses					

WITH OR WITHOUT COST-SOCIALISATION

Enabling better operational management of site remediation issues

Regardless of whether there are changes to the responsibility and funding of remediation work, there may be opportunities to enable better management of site remediation issues, such as, through improving the information available to the different parties and better tracking of issues.

Current operational challenges

Pre first visit

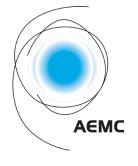
• Some stakeholders have raised concerns that MPs walk onto site with limited information available regarding the site, including the likelihood of site defects. In the VIC AMI roll-out, the DNSPs had access to some site information like age, location and inspection data.

Post first visit

- It is within no one's responsibility or interest to pursue and remind customers to rectify site remediation issues
- Customers aren't aware of their obligations to rectify or options available to them.
- MPs can't see if a site was previously defected by another MP

Potential approaches to improve operational efficiencies

- 1. Are there other operational challenges that are being faced in the management of site remediation issues?
- 2. If there is a programmed roll-out of advanced meters under the current roles and responsibilities, could greater sharing of information and better coordination between MPs, DNSPs, Retailers and customers enhance the efficiency of the roll-out and customer experience?
 - a) If so, what information could be shared between the parties?
 - b) Are there existing communication systems in place that could be altered/expanded to share site information between market participants?
 - c) What steps could be taken by each party to enable better coordination?



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ENABLING SERVICES & DATA WORKSHOP UTILISING THE RIGHT EXCHANGE ARCHITECTURE



BACKGROUND PROGRESS SINCE DIRECTIONS PAPER

When the review paused, a priority for industry continuing the development a framework to facilitate efficient data exchange between participants

- A small working group of DNSPs and MCs were formed after the project paused to progress work on the basic power quality data service between DNSP and MC.
- The working group set themselves two workstreams:
 - 1. Basic power quality service form and format, where we have made good progress
 - 2. Exchange architecture how do we best transfer the data between parties

- Up for discussion today

Contents



Re-cap of stream 1

Basic power quality data specifications



Workshop for stream 2

Utilising the right exchange architecture

• Using a SWOT (strengths, weaknesses, opportunities, threats) analysis.

RECAP OF STREAM 1 BASIC POWER QUALITY DATA SPECIFICATIONS

Re-cap of stream 1 What is the PQ basic service contents?

Guiding principles	Key assumptions
Provide a consistent set of measurements and services from all POC smart meters that are remotely communicating and be made widely available to DNSPs.	Basic Service not required from non-communicating smart meters.
Supported by the capabilities of POC meters already deployed and will not require meter hardware upgrades. Upgrade of software and/or meter reconfiguration may be necessary.	Available by default to DNSPs from all POC meters at a go- live date in the future.
As the service will generate large volumes of PQ data, the data set should contain essential values only to minimise transaction costs.	

Should, or be likely to, contribute to the national electricity objective through the use cases that the data enables.

Agreements reached throughout the pause on PQ data service

Should be captured from all comms-enabled Type 4 small customer meters.

Will capture 5-minute data which is aligned to market time.

To identify the meter, use NMI#, serial#, and each element.

Will record voltage, current, and phase angle, for both export & import.

Will be delivered every 6 hours (i.e., the prior 72 market intervals) at a minimum.

Could allow access to other basic outcomes, like enquiry service and a multi-meter ping.

Implementation considerations realised over the PQ data service working group

Need to differentiate from C&I, pre-PoC, and non-5MS Type 4 smart meters that are also comms-enabled. Need to allow for the broadest outcomes to be achieved (average vs. instantaneous) to start at 00:00, 00:05, and 00:10.

May need a specification for different labels of phases, elements. Need to determine the best place for service level agreements for these services.

There could be privacy considerations with allowing these identifiers to go broader. Need a common data convention to standardise and raise veracity of manufacturer recording data.

Need to understand cost differential and order of magnitude in service quality.

Need to determine the right exchange architecture to utilise

WORKSHOP

UTILISING THE RIGHT EXCHANGE ARCHITECTURE Workshop of stream 2 What data are we exchanging and what architecture is available?



Objective

Defining the right exchange architecture to use for sending and receiving the power quality data service, in order to recommend an industry view to the AEMC Metering Review.



Scope

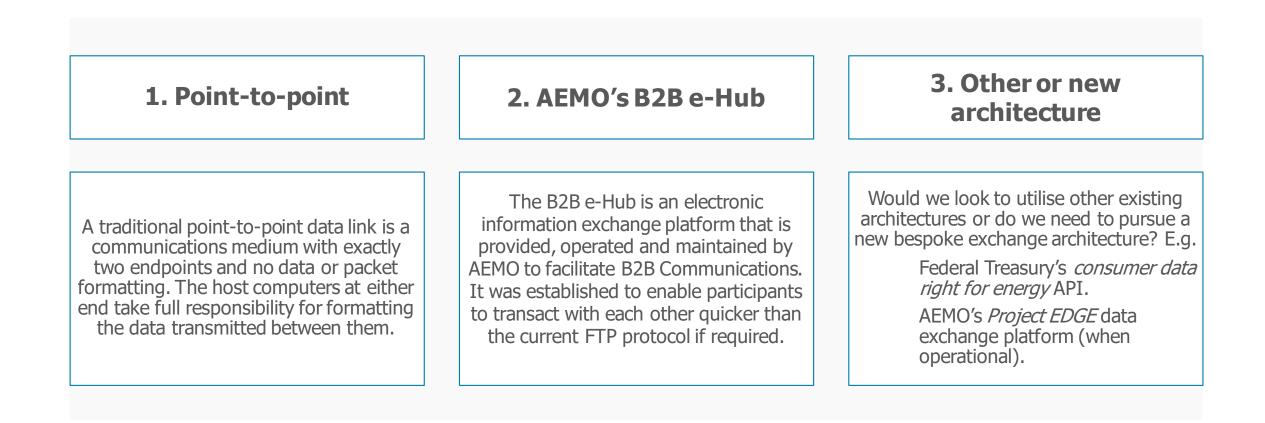
Limited to defining the specific architecture that the MC's Type 4 comms-enabled meter and associated systems must support and be made available to the DNSP.

Workshop of stream 2 What data are we exchanging and what architecture is <u>available</u>?

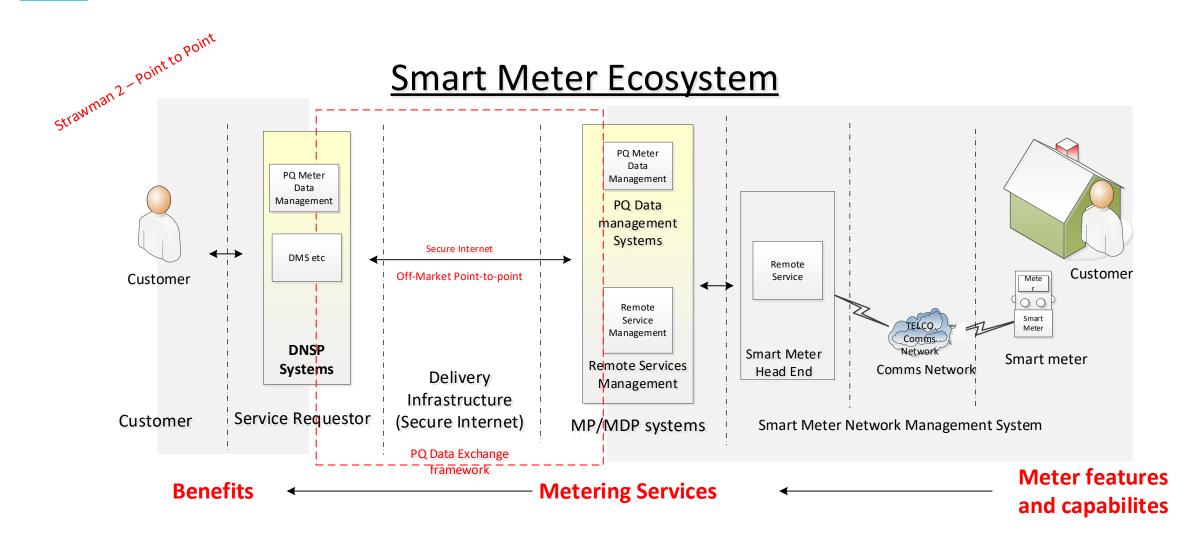
Guiding principles	Key assumptions
Minimise transaction costs and improve coordination between parties.	Will be one-to-one message or web-service based or file based
Avoid duplication of infrastructure costs, even for advanced service	A single, consistent method would reduce transaction costs by ensuring that they are not duplicated unless necessary
Promote cyber secure exchange	An exchange architecture can also improve coordination by ensuring that all potential parties are already close to alignment before transacting

Should, or be likely to, contribute to the national electricity objective through the use cases that the data enables.

What are the options?



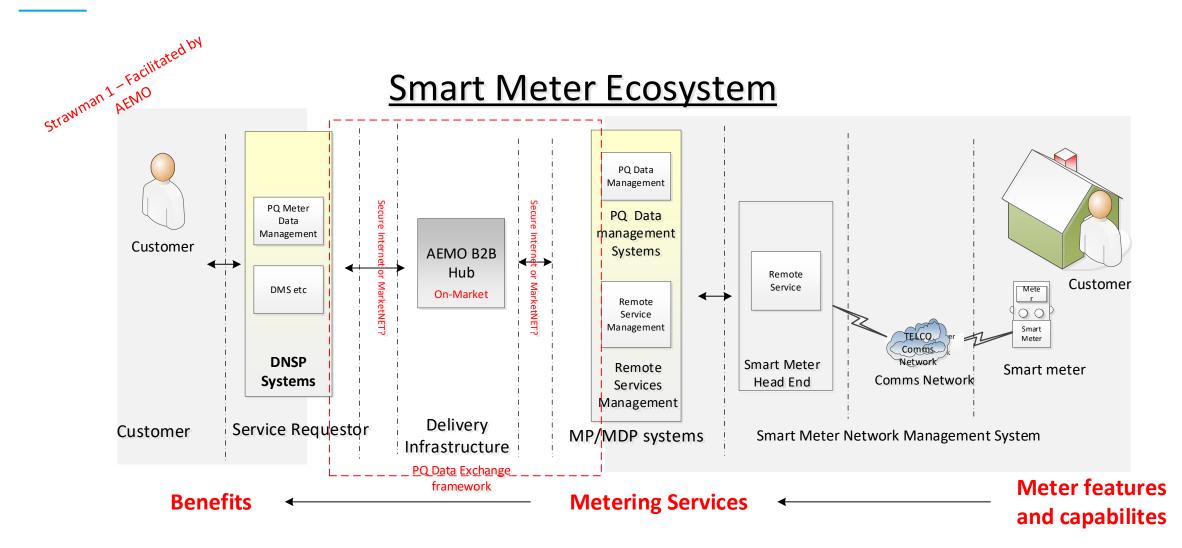
Overview of option 1 - point to point



SWOT analysis of Option 1 – Point to point

Strengths	
Weakness	
Opportunities	
Threats	

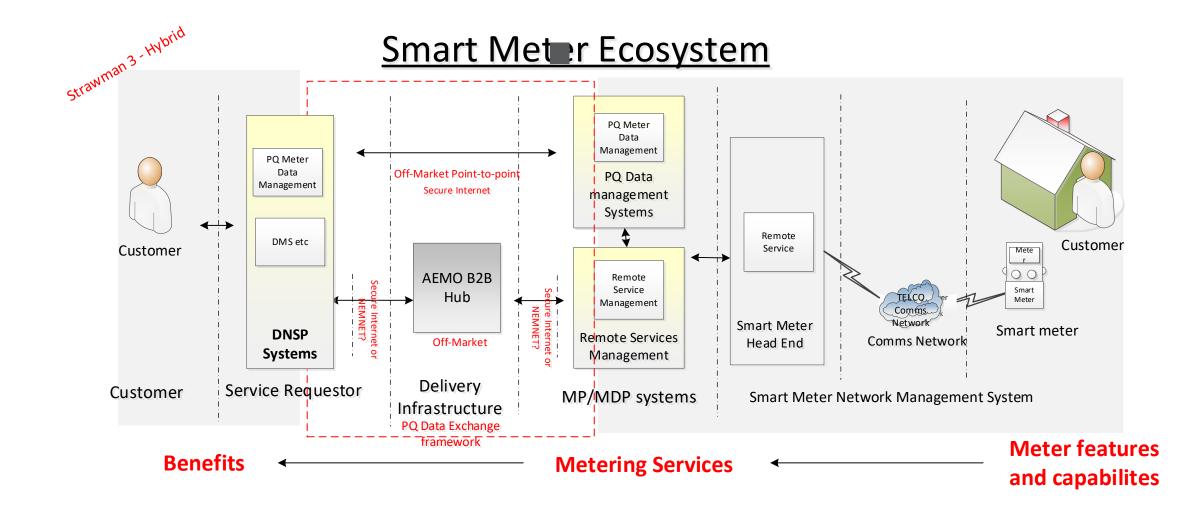
Overview of Option 2 – AEMO's B2B e-Hub



2. AEMO's B2B e-Hub

Strengths	
Weakness	
Opportunities	
Threats	

Overview of Option 3 – Other or new architecture

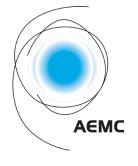


SWOT analysis of Option 3 – Other or new architecture

Strengths	
Weakness	
Opportunities	
Threats	



- It's been a long journey for this working group—but we've earned an agreed DNSP and MC view for data access.
- The output of the working group will be incorporated as recommendations in our draft report.
- The draft report will seek stakeholder views on the validity of these recommendations from the broader stakeholder group, identifying gaps in how this exchange could be expanded beyond MC-DNSP. For example:
 - Does broader industry agree?
 - What else might we need to consider or incorporate?
 - How could non-DNSPs receive metering data or services?
 - How do privacy and sharing arrangements work for non-DNSPs?



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