Electrical Trades Union

ELECTRICAL TRADES UNION SUBMISSION

FEBRUARY, 2023

AEMC REVIEW OF THE REGULATORY FRAMEWORK FOR METERING SERVICES – DRAFT REPORT

About the ETU

The Electrical Trades Union of Australia ('the ETU')[1] is the principal union for electrical and electrotechnology tradespeople and apprentices in Australia, representing well over sixty-thousand workers around the country.

ETU members will form the basis of any future plan to achieve universal smart meter uptake on the NEM as licensed electrical workers. The ETU looks forward to working with the AEMC, industry, and any other relevant bodies to ensure the safety and fair treatment of our members and the general public, as well as the efficient and effective deployment of universal smart meters.

Acknowledgement

In the spirit of reconciliation, the ETU acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all First Nations peoples today.

1. Implementation of the acceleration target

Discussion Question	ETU Response
1. Do stakeholders consider an acceleration target of universal uptake by 2030 to be appropriate	The ETU supports the AEMC's proposed target of universal smart meter uptake by 2030 in NEM jurisdictions. We note that the acceleration required to achieve this target may be impacted by unavoidable factors like: • skills shortages • supply shortages • access issues • unremedied site defects The ETU believes that the ambition of the target is necessary to drive an ambitious deployment from participants, recruiting more apprentices to meet industry-wide skills needs and unlocking consumer and network benefits sooner. Additional monitoring provisions to ensure participants are adequately contributing towards the training needs of the industry will be needed to ensure the target can be reached over the next 7 years.

[1] Being a division of the CEPU, a trade union registered under the *Fair Work (Registered Organisations) Act 2009* (Cth).

	Consideration should be given when enforcing compliance with the target to participants who encounter unanticipated or unavoidable roadblocks. A lack of flexibility in this regard may lead to undue pressure being placed on employees to engage in unsafe, unethical, or illegal practices in order to meet hard targets.
2. Should there be an interim target(s) to reach the completion target date	Interim targets should form a key role in monitoring the deployment of smart meters in order to identify and address emerging issues as they appear, as well as compare and assess best practice among participants. The same consideration outlined in the previous response should also be applied to any interim targets or milestones. Interim targets should also be set in a manner that accounts for a gradual acceleration as participants scale up to meet their commitments.
3. What acceleration and/or interim target(s) are appropriate	The ETU supports annual targets for monitoring the deployment of smart meters.
4. Should the acceleration target be set under the national or jurisdictional frameworks?	The ETU believes that the 2030 acceleration target of universal uptake should be set out in the national framework to provide consistency across the NEM. Interim targets should be considered and set at the jurisdictional level to ensure that local operational circumstances, safety requirements, and policy objectives can be factored into the detail of these targets.

2. Legacy Meter Retirement Plan (Option 1)

Discussion Question	ETU Response
1. Do stakeholders consider this approach feasible and appropriate for accelerating the deployment of smart meters	The ETU considers the proposed Legacy Meter Retirement Plan (LMRP) as feasible and the appropriate option for accelerating the deployment of smart meters. DNSP's are best placed to develop the plan, given their access to critical information on

	the location and status of legacy meters and ability to coordinate retailers and metering parties from upstream. A DNSP-led approach will need considerable administrative effort in order to conduct genuine and effective consultation with • Retailers • Metering parties • Jurisdictional governments • Safety regulators To ensure that each party and their constituents/customers have their needs taken into consideration. Notwithstanding these concerns regarding administrative burden, Option 1 is our preferred approach.
2. Do stakeholders consider the Commission's initial principles guiding the development of the Plan appropriate? Are there other principles or considerations that should be included?	The ETU considers the initial principles guiding the development of the LMRP to be appropriate. We would like to highlight however that the proposed principles are lacking any reference to the safety of workers, customers, and the wider community. Safety should always be one of the primary considerations in any project, especially in the electrical industry and for initiatives requiring such immense scale and speed. Lessons learned from other comparable projects like rooftop solar installation programs, the Home Insulation Program, and the Victorian smart meter rollout should be reviewed and applied where appropriate to ensure best practice. The principles need to take into consideration safety requirements including: • the availability of suitably trained and qualified installers (with two installers required to safely undertake each meter upgrade); • the need to manage site access hazards (e.g. asbestos exposure) and customer site defect issues that inhibit the ability to safely exchange meters;

- the requirement to clearly define roles and responsibilities and develop safe work practices if multiple parties are required to coordinate the replacement of meters at multi-occupancy sites concurrently; and
- the ability for participants to safely deliver the retirement schedule within accelerated timeframes, i.e. participants should not be placed under undue pressure to achieve unrealistic targets.
- The barriers created by ringfencing which have the effect of preferencing small contractors who don't invest in training and occupational safety over Network Businesses who provide for apprenticeships, training and comprehensive safety systems including systems to deal with safely working around asbestos.

The AEMC should commit to work with jurisdictional electrical safety regulators to proactively manage any associated risks associated with the universal rollout of smart meters.

Further specific guidance will also need to be given on the principle that retirements "take into account the impact on other parties involved in metering." This principle needs to be applied in the interest of the health, safety, & wellbeing of customers (particularly vulnerable customers), workers, and the general public, not just the commercial and financial interests of retailers and metering parties.

Whilst a geographical approach to a rollout of this scale will ease administrative burden and streamline planning and resourcing, other priorities like replacing 'family failures', upgrading difficult to read sites, and caring for vulnerable customers should

	also play a role in targeting deployment of the acceleration plan.
3. If this option is adopted, what level of detail should be included in the regulatory framework to guide its implementation?	In the event this option is adopted, further detail is required regarding mechanisms to manage customer-specific site remediation issues and legacy meters that have not been replaced at the conclusion of the retirement period, as well as exclusions from requirements to replace targeted meters within specified timeframes.
4. Do stakeholders consider a 12-month time frame to replace retired meters appropriate? Should it be longer or shorter?	The ETU considers a 12-month timeframe to replace retired meters to be sufficient time for participants to adequately plan their workloads, however consideration needs to be able to be given to participants acting in good faith who are affected by external factors outside their control.
5. Are there aspects of this approach that need further consideration, and should any changes be made to make it more effective?	Further consideration and clarification is required with respect to: • Any necessary measures to ensure the legacy meter retirement plan can be delivered safely by participants within accelerated timeframes. • The process and timeframes for DNSPs to consult on and develop the legacy meter retirement plan and obtain the AER's approval. • Expectations that will be placed on DNSPs in consulting with stakeholders on the development of the plan and responsibility for managing participants' conflicting views and priorities. • Customer obligations with respect to providing access for meter upgrades and remediating customer site defects (including support mechanisms for vulnerable customers).

	• Responsibility for costs incurred by dnsps in developing and managing the retirement plan. • Responsibility for reporting against deployment targets and what, if any, enforcement action will be taken for failing to meet targets. • Responsibility for additional costs incurred as a result of delays in meeting replacement targets, wasted truck visits and the need to visit sites on multiple occasions to complete complex meter exchanges; and • The plan for managing legacy meters that have not been upgraded at the conclusion of the acceleration period in 2030.

3. Legacy meter retirement through rules or guidelines (Option 2)

Discussion Question	ETU Response
1. Do stakeholders consider option 2 feasible and appropriate for accelerating the deployment of smart meters? Are there aspects of option 2 that would benefit from further consideration?	The ETU's preferred deployment acceleration mechanism is for the industry-led option 1. Leading a prescriptive approach from agencies with no practical involvement in the operational elements of the retirement plan will be less efficient and less responsive to changing circumstances and needs as the acceleration progresses. DNSP's are far better placed to provide information on the status and location of legacy meters and coordinate operational aspects of the smart meter deployment.
2. Are market bodies the appropriate parties to set out the legacy meter retirement schedule?	Market bodies are not adequately positioned, experienced, or knowledgeable in the practical and operational aspects of the smart meter deployment. Assigning responsibility to market bodies for setting out the retirement schedule would not be appropriate or responsible.
3. If option 2 is adopted, should the meter retirement schedule	Whilst adoption of option 2 is not our preference, if it were to occur the ETU

be located in the rules, or guidelines developed by the AER of AEMO?	would prefer that the schedule be located in the AEMO guidelines where they can be more easily reviewed and amended should circumstances require.

4. Retailer Target (Option 3)

Discussion Question	ETU Response
1. Do stakeholders consider option 3 is feasible and appropriate for accelerating the deployment of smart meters? Are there aspects of option 3 that need further consideration	As identified in the discussion paper, Option 3 may be feasible but is hardly the most appropriate option in practicality due to the added complexity of having a retailer-led rollout as compared to one led by DNSPs. Retail markets are made up of a wide range of participants with different market shares, geographic footprints, and rates of smart meter uptake. What's more is that churn in both customers and market participants leads to these points of differentiation are constantly shifting, adding significant complexity to the coordination of a mass rollout. To efficiently deliver the millions of meter replacements required by 2030 to meet the acceleration target, a more centralised method of targeting and coordinating deployment is needed than is offered by Option 3.
2. If this option is adopted, what are stakeholders' suggestion on how retail market dynamics could be taken into consideration in both setting the uptake targets and monitoring performance?	The ETU notes that the *Competition in metering services* reforms were intended to promote the delivery of smart meters by market participants and has as yet failed to do so at an acceptable pace. Retail providers currently lack the incentives to prioritise the development and execution of what will be a costly and complex deployment plan. Applying option 3 will need to address this dynamic in order to bring retailers on board and prevent the cost of the deployment from adding cost pressures to already excessive consumer electricity prices. Care should also be taken to prevent market distorting practices such as discount offers for customers with smart meters

	already installed that may allow participants with outsized market power to inflate their performance figures.
3. Should the rules or a guideline outline only a high-level target (universal uptake by 2030 taking into account practicality of replacements) or more granular targets or interim targets?	Should Option 3 be adopted, the ETU believes a guideline would be sufficient to outline a high-level and interim yearly step targets for the acceleration deployment. Sufficient flexibility would need to be offered to providers to account for the operational challenges raised in response to previous options, as well as a customer base that is constantly shifting.

5. *Stakeholders' preferred mechanism to accelerate smart meter deployment*

Discussion Question	ETU Response
1. What is the preferred mechanism to accelerate smart meter deployment?	The ETU's preferred mechanism is Option 1.
2. What are stakeholders' views on the feasibility of each of the options as a mechanism to accelerate deployment and reach the acceleration target?	Refer to previous responses.
3. Are there other high-level approaches to accelerating the deployment that should be considered?	Any of the approaches raised in the discussion paper should be complemented by a consumer outreach and communications campaign to inform customers and promote the benefits for smart meters. Such a campaign creating acceptance or even enthusiasm for smart meter deployment will not only help operations run smoother, but may help protect workers from facing undue resistance or hostility from certain customers. In addition, the regulator should commence an immediate review into the appropriateness of ringfencing guidelines by conducting an independent regulatory impact assessment of ringfencing guidelines to assess the cost and efficiency impacts this regime has imposed.

6. *Feedback on no explicit opt-out provision*

Discussion Questions	ETU Response
1. Do stakeholders have any feedback on the proposal to remove the opt-out provision for both a programmed deployment and retailer-led deployment?	The ETU supports the proposal to remove the opt-out provision for both a programmed and retailer-led deployment. As well as streamlining and simplifying the rollout, this will make meter readers safer, guaranteeing that more workers are able to go home in one piece and preventing tragic instances like that which led to the death of an Energex worker in Brisbane in December 2022
2. Are there any unintended consequences that may arise from such an approach	ETU members have conveyed concerns that removing the ability to opt out may force them to interact with customers who object to having smart meters installed and may become threatening or violent towards staff carrying out their work. Guidelines ensuring that workers never attend sites alone and prioritise their own personal safety ahead of performance indicators or completion targets should be sufficient to prevent instances of workplace harm or injury from customers or their pets.

7. *Removal of the option to disable remote access*

Discussion Question	ETU Response
1. Do stakeholders consider it appropriate to remove the option to disable remote meter access under acceleration?	ETU members have reported safety concerns regarding the removal of the option to disable remote access. Customers with sceptical attitudes towards the installation of remote mobile technology or information sharing with corporate entities may become hostile or aggressive in the process of having such access installed, putting the safety and wellbeing of workers in jeopardy and threatening to disrupt deployment efforts. Further, many customers in rural or remote locations lack the telecommunications network access to facilitate remote access. The ETU believes that the option to disable remote access should be maintained for the safety of the broader workforce, however

	customers that opt out of remote access should still be required to bear the costs of continued manual meter reading.

8. Process to encourage customers to remediate site defects and track sites that need remediation

Discussion Question	ETU Response
1. Do you consider the proposed arrangements for notifying customers and record keeping of site defects would enable better management of site defects?	The ETU is supportive of the proposed arrangements for notifying customers and keeping records of site defects. The proposed site defect management process will better enable retailers to monitor and manage defects in a consistent and organised manner that ensures they aren't penalised for customers' inability to remedy defects. The proposed process for record keeping of site defects will also help government agencies to identify and support vulnerable customers who may not be capable of carrying out their own site remediation. To prevent instances of customers unaware of available supports placing themselves under financial stress in order to facilitate remediation, we believe the outline of available funding arrangements proposed to accompany the second notice should also be provided with the first notice. We are also concerned that the requirement that customers notify retailers of remediation being carried out if more than 2 months after the second notice will lead to customers being left behind indefinitely. Whether to remind customers to notify retailers or to carry out the remediation itself, methods of providing consistent nudges to customers who have been discounted from the rollout target should be considered to ensure coverage is as close to universal as possible by 2030. Finally, requirements to record site defect information in MSATS should be expanded

	such that jurisdictional electrical safety regulators are able to access information as well as registered participants. Maintaining high safety standards is critical to the ongoing success of the deployment and jurisdictional regulators should have visibility over the safety status of the electrical installations being dealt with.

9. Implementation of the "one-in-all-in" approach

Discussion Question	ETU Response
1. Would the proposed 'one-in-all-in' approach improve coordination among market participants and the installation process in multi-occupancy sites?	The proposed one-in-all-in approach presents a major challenge in coordinating efforts of multiple parties at varying stages. Major effort would need to go in to establishing well defined roles and responsibilities, ensuring that all parties are aware of and adhere to common practices in coordinating activities, sharing information, and communicating with customers. Best practice guidelines developed to facilitate this level of coordination should also include safe work practices to ensure the protection of workers and the general public. Additionally, whilst the one-in-all-in approach will reduce the number of planned outages for multi-occupancy residences, it may lead to outages needing to be extended for periods of multiple days. We would encourage reconsideration of previous proposals to install meter isolation links in these multi-occupancy residences to minimise interruptions to customers through the smart-meter installation process and into the long-term with ongoing maintenance.
2. Are the time frames placed on each market participant appropriate for a successful installation process of smart meters?	The proposed time frames are generally appropriate, however this is reliant on ensuring that all impacted parties are on the same page and coordinating their efforts effectively. Limited scenarios where bottlenecks may present themselves such as a need for a temporary isolation should

	be able to trigger some leniency in meeting specified deadlines under the proposal.
3. Are there any unforeseen circumstances or issues in the proposed installation process flow and time frames?	Coordination issues and extended outages are the most likely source of unforeseen complications as raised in Question 9.1 above.
4. How should DNSPs recover costs of temporary isolation of group supply from all retailers?	The ETU has no preference for DNSP cost-recovery methods in raising TIGS requests. Reconsidering the installation of meter isolation links could potentially resolve this issue.
5. Can the proposed role of the DNSP in the one-in-all-in approach be accommodated by the existing temporary isolation network ancillary services?	Yes, however limited resources and staff may lead to bottlenecks that delay legacy meter replacements in multi-occupancy sites.
6. Which party should be responsible for sending the PIN in the context of the on-in-all-in approach	DNSPs are best placed to be responsible for PINs in the context of the one-in-all-in approach given their visibility of involved market participants and customers, including those registered as having life support.

10.Strengthening information provision to customers

Discussion Question	ETU Response
1. Do you have any feedback on the minimum content requirements of the information notices that are to be provided by Retailers prior to customers prior to a meter deployment?	The ETU is supportive of the proposed minimum content requirements for information notices to be provided to customers by retailers prior to deployment. We would however request that basic safety information be added to remind customers of hazards associated with electrical installations. The increased functionality and interactivity afforded to consumers with access to smart meter data may contribute to a false sense of security that these installations are in fact safe for non-licensed individuals. A safety reminder and instructions for arranging maintenance or repairs using licensed tradespeople could save lives and should be included as a minimum requirement.

2. Are there any unintended consequences which may arise from such an approach?	It remains likely that a high proportion of customers will either outright ignore or struggle to understand the information provided. Retail customer service teams should also be provided with briefings and/or FAQ responses for a likely uptick in customers contacting their retailers for clarification or with complaints.
3. Which party is best positioned to develop and maintain the smart energy website?	The Smart Energy website should be developed and maintained by a federal regulator or government agency to ensure the provision of neutral, consistent, and easily accessible information to all customers on the NEM.

11. Supporting metering upgrades on customer request

Discussion Question	ETU Response
1. Do stakeholders support the proposed approach to enabling customers to receive smart meter upgrades on request	The ETU does not support the proposed approach enabling customers to receive smart meter upgrades on request for any reason. Whilst we accept and acknowledge the principles underpinning this proposal, the scale of the task at hand is such that enabling these requests would threaten the efficient, timely, and cost-effective deployment of meters across the NEM. Whilst allowing for customers to make requests allows those with a keen interest to skip ahead of the queue, requiring parties to accommodate these requests while simultaneously managing the targeted deployment program is not feasible and will lead to wider delays for others waiting for the wider rollout. With this in mind, it is our view that a geographic approach to deployment contributes more fully to the NEO. Some issues raised regarding customer experience may be alleviated in part by providing ongoing progress updates and estimated deployment date ranges by locality or postcode on the Smart Energy

	website, like that offered to customers during the rollout of the National Broadband Network. The ETU maintains that customers should be entitled to meter replacements on request in limited circumstances where required, such as connection upgrades to enable rooftop solar installations.

12. Tariff assignment policy under an accelerated smart meter deployment

Discussion Questions	ETU Response
1. Which of the following options best promotes the NEO: **a. Option 1: Strengthen the customer impact principles to explicitly identify this risk to customers** **b. Option 2: Prescribe a transitional arrangement so customers have more time before they are assigned to a cost-reflective network tariff** **c. No change: Maintain the current framework and allow the AER to apply its discretion based on the circumstances at the time**	The ETU considers it to be in the best interests of consumers and the efficient operation of electricity services to make no changes to the current framework and allow the AER to continue to apply discretion based on relevant circumstances.
2. Under options 1 or 2, should the tariff assignment policy apply to: **a. All meter exchanges – for example, should the policy distinguish between customers with and without CER** **b. The network and/or the retail tariffs**	The ETU supports no change.
3. What other complementary measures (in addition to those above) could be applied to strengthen the current framework	The ETU supports no changes to the framework.

13. Minimum contents requirement for the "basic" PQD service

Discussion Questions	ETU Response
1. Should the 'basic' PQD service deliver any other variables besides voltage, current, and phase angle?	The ETU supports the inclusion of voltage, current, and phase angle as a minimum requirement in a proposed 'basic' PQD service
2. Does the 'basic' PQD service require any further standardisation, e.g. service level agreements? If so, where should these service levels sit?	The ETU is supportive of developing standardised service level agreements to enhance consistent service delivery.
3. Should the Commission pursue a data convention to raise the veracity of 'basic' PQD	The ETU supports the development of a data convention, applicable across the entire NEM, to ensure the veracity, consistency, and accessibility of data.

14. Utilising the right exchange architecture for the 'basic' PQD service

Discussion Questions	ETU Response
1. Should the industry use the shared market protocol? If not, why?	The ETU supports the recommendation to exchange basic PQD in JSON directly from peer-to-peer following the shared market protocol.
2. Should stakeholders exchange PQD directly, using NEW clause 7.17.1(f)	The ETU supports the direct, peer-to-peer exchange of PQD.
3. If so, should the Commission prescribe this in the rules, or could this be by agreement between parties?	The ETU supports PQD sharing arrangements being based on agreements between parties, however we accept that there may be need for the development of a framework within the NER to provide consistent arrangements accounting for churn.

15. Prices for power quality data services

Discussion Question	ETU Response
1. Is it sufficient for the prices for PQD services to be determined under a beneficiary pays model,	The ETU fails to understand how a commercially determined beneficiary pays model will deliver the best results for participants or consumers.

especially with a critical mass of smart meters?	Requiring DNSPs to negotiate with multiple metering coordinators to procure data will be expensive and time-consuming, as well as have unpredictable effects on DNSP regulatory funding proposals given the added uncertainty to cost structures created by having multiple varied agreements with constant churns. It is unclear how applying a market-based system for PQD costs will deliver any real benefit to consumers. Neither party is exposed to competitive forces in undertaking negotiations on PQD pricing, DNSPs are geographically fixed and metering coordinators are appointed by retailers, themselves subject to customer churn, who are not party to the proposed negotiation process. Exposing a service that will be soon approaching universal uptake to market processes without any truly competitive element is a recipe for market failure. Commercial determinations for PQD costs will simply create another avenue for rent extraction in the electricity market with consumers ultimately footing the bill.
2. Are alternative pricing models, e.g. principles-based or prescribing zero-cost access, more likely to contribute to the long term interest of consumers?	We would be supportive of the alternative model proposed wherein 'basic' PQD is provided to DNSPs at no cost and then recovered through the retailer and metering coordinator annuity. This model exposes the PQD costs to a greater level of competition and may have more success in driving innovative practices, consumers are also able to exercise more direct power through the ability to switch retailers if given an unfavourable price.

16. Regulatory measures to enable innovation in remote access to near-real-time data sooner

Discussion Question	ETU Response
1. Do stakeholders support the Commission pursuing enabling regulatory measures for remote access to near real-time data? If so would it be suitable to: *a. Op1 – Require retailers to provide near real-time data accessible by the consumer in specific use cases (while allowing them to opt-out)* *b. Op2 – Allow customers to opt-in to a near real-time service via their retailer for any reason* **c.** *Op3 – promote cooperation and partnerships between Retailers and new entrants for near real-time data services, e.g. in a regulatory sandbox*	The ETU supports the Commission pursuing regulatory measures for enabling remote real-time data access through allowing an opt-in service via retailers.
2. If so, could the Commission adapt the current metering data provision procedures?	
3. Are there any standards the Commission would need to consider for remote access?	
4. What are the new and specific costs that would arise from these options and are they likely to be material?	The ETU notes that the costs associated with retrieving and providing data are likely to be material and should be considered separately to the costs for existing metering services currently provided.

17. Regulatory measures to enable innovation in local access to near-real-time data sooner

Discussion Question	ETU Response

1. **Do stakeholders support the Commission considering regulatory measures for local access to near real-time data? If so, would it be suitable to:** a. *Define a customer's right in access the smart meter locally for specific purposes?* b. *Outline a minimum local access specification, including read-only formatting and uni-directional communications? Are there existing standards that MCs can utilise?* **c.** *Codify a process for activating, deactivating, and consenting to a local real-time stream? If so, could the Commission adapt the current metering data provision procedures?*	The ETU supports the Commission considering regulatory measures for local access to near-real-time data. Access to this data may help to magnify the consumer engagement with smart meter functions and provide a more effective way of changing consumption behaviours, however stringent standards should be maintained to preserve the privacy, dignity, and choice of customers. Minimum standards will also be necessary to account for meters on the market that may be unable to support local near-real-time data feeds and maintain consistency in the processes for obtaining consent, activating, and deactivating local real-time data across all providers.
2. **Are there any other material barriers that the Commission should be aware of?**	

18. Addressing short term cost impacts and ensuring pass through of benefits

Discussion Questions	ETU Response
1. **Are stakeholders concerned about the risk of short-term bill impacts as a result of the accelerated smart meter deployment? To what extent would the above offsetting and mitigating factors address this risk?**	The ETU has concerns that the accelerated smart meter deployment will deliver bill impacts to consumers already struggling with cost-of-living pressures and high energy prices in the short term. Whilst acknowledging the benefits of the smoothed cost profile and proposed transparency measures, there is still likely to be a pass through of costs to consumers in the short-term before benefits materialise at scale.
2. **If stakeholders are concerned about residual cost impacts, what practical measures cold**	Short-term concessional finance may be a viable option to assist retailers in smoothing out their costs over the short-term.

be put in place to address these risks?	
3. What are the implications for AER revenue determinations for the upcoming NSW, ACT, & TAS DNSP regulatory control periods? Is there a risk that network cost savings as a result of the accelerated smart meter deployment will not be fully passed through to consumers under the regulatory framework?	The ETU considers that the risk of network cost savings from smart meter deployment not being fully passed through due to the timing of AER revenue determinations is negligible and will not have significant implications. NSW, ACT, & TAS will have all had a new AER revenue determination by the end of the accelerated deployment in 2030, in time to reap the benefits of deployment reaching a critical mass.