Power of choice – giving consumers options in the way they use electricity

Submission from Jemena Limited to the Australian Energy Market Commission

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1 Background to Jemena

Jemena directly owns two network businesses: Jemena Gas Networks (NSW) Limited (**JGN**) and Jemena Electricity Networks (Vic) Limited (**JEN**). Additionally, Jemena owns two major gas transmission pipelines.

JGN is a covered pipeline service provider, within the meaning of the National Gas Rules (**NGR**), that serves 1,100,000 consumers in Sydney, Newcastle, Central Coast and Wollongong and over 20 regional centres across NSW.

JEN is an electricity distribution network service provider (**DNSP**) that serves 320,000 consumers in north western Melbourne.

Jemena provides widespread services to a range of gas and electricity assets in Australia. Overall, Jemena manages $8 billion worth of gas and electricity assets.

2 Introduction

Jemena appreciates the opportunity to respond to the AEMC on the Power of Choice draft report (**draft report**).

Jemena considers the emergence of the active demand side participation (**DSP**) to be the next important stage in the evolution of the national electricity market (**NEM**). We are supportive of changes to some aspects of the market conditions to facilitate efficient DSP. The key factor to realising the benefits of DSP is to get consumer engagement. To this end, we believe the Power of Choice review has made good progress in indentifying opportunities for consumers to make informed choice about the way they use electricity.

We agree that effective communication and education strategies are needed to build consumer confidence in the take up of some of the DSP initiatives.

Of the initiatives identified, Jemena considers we need to first implement those initiatives that will produce significant DSP outcomes. We believe they are:

- Enhancing consumers' ability to access consumption information
- Gradual phasing in of time varying network tariffs
- Putting in place arrangements to protect vulnerable consumers, including the choice to opt-out of proposed pricing schemes
- Addressing the constraints in the current design of the Demand Management and Embedded Generation Connection Incentive Scheme (**DMEGCIS**) to improve the incentives for DNSPs to engage in DSP investments.

3 Chapter 2 – Facilitating consumer access to electricity consumption information

Questions

1. *What should be the minimum standard form and structure of energy and metering data supplied to consumers (or their agents)? Should these arrangements differentiate between consumer sectors (ie industrial/commercial and residential)*
2. *When do you think it is appropriate for a retailer (or responsible party) to charge a fee for supplying energy and metering data to consumers or their agents?*

3.1 Question 1

Jemena is broadly supportive of the recommendations provided in the section 2 summary of the draft report. Jemena believes that facilitating consumers' access to their consumption data will not only provide consumers with the necessary tools to make more informed choices about their energy use. This is also a positive step towards DNSPs and retailers providing more engagement with consumers to help them understand how their energy consumption translates to cost impacts.

Jemena recommends that the minimum standard form and structure of consumption data supplied to a consumer should be in CSV format. CSV format is a specially formatted plain text file that stores spreadsheets or basic database-style information in a very simple format. This format has the added benefit of being readable by a person and can be directly imported into spreadsheet tools for analysis.

The CSV structure should include the National Meter Identifier (**NMI**), meter serial number, consumption (KWh), date, estimated or actual read followed by 48 half hourly interval meter reads per day. The format of the data and in particular the content of the data must be easily understood by a lay person if residential consumers are expected to make meaningful use of their energy consumption data. When the minimum standard form and structure of the energy and metering data is settled, there needs to be educational information made available to consumers to ensure their understanding of their energy consumption in an agreed industry format.

Metering data in CSV format is also currently widely applied throughout the NEM. It can therefore be expected that supplying information in this format will minimise further cost burden to the industry.

Consumers in the Jemena Electricity Networks **(JEN**) distribution area are currently able to directly download historical consumption data in a simple flat file CSV format via Jemena's Electricity Outlook portal.

3.2 Question 2

Jemena agrees with the National Energy Customer Framework (**NECF**) mandate that requires historical metering data to be provided to residential and small business consumers at no cost – however, there will be circumstances where fees may apply. Jemena supports the AEMC position[1] that:

- Standardised format data is supplied to consumers – this should be at no cost to the consumer;
- Where additional data services are provided by the retailer or responsible party – a reasonable fee should apply; and
- Where consumers (or their agents) request information more than once per billing cycle over a twelve month period, a retailer (responsible party) should be able to charge a reasonable fee. This is consistent with existing NECF provisions.

Questions

3. *Do you agree that general market information should be published on consumer segment load profiles to inform the development of DSP products and services to consumers?*
4. *Is AEMO the appropriate body to publish such information, or should each DNSP be required to provide such information particularly where data will be at the feeder level where accumulation meters are installed?*

3.3 Question 3

Jemena agrees that general market information should be published on consumer segment load profiles to inform the development of DSP products and services to consumers. Jemena believes that educational initiatives such as these promote

[1] Ibid, p28

development of DSP, general consumer awareness regarding energy consumption and inform sound policy development.

3.4 Question 4

Jemena supports the proposal that the Australian Energy Market Operator (**AEMO**) is the appropriate body to publish such information. However, it should be noted that AEMO only holds second tier energy and meter data and not first tier. The exception to this being in Victoria where distribution businesses are required to send AMI meter data to AEMO for all customers with a smart meter. AEMO is best placed to publish standard market information on average consumer sector profiles. Jemena does not support any requirement for DNSPs to provide such information at a feeder level. To utilise any information published at a feeder level, a customer would have to know the feeder they are connected to. This would add a level of complexity that would exceed the general level of energy literacy and would not be helpful given consumers' knowledge of electricity use is already limited. Jemena believes there is a greater likelihood of customers responding to DSP if the information relating to energy consumption patterns is kept as simple as possible.

The AEMC notes that currently AEMO publishes information on the Net System Load (**NSL**) profile for each of the distribution network areas. Jemena considers a requirement for DNSPs to provide a link on their website to the AEMO information to be useful in order to inform the development of DSP products and services to consumers.

4 Chapter 3 – Engaging with consumers to provide DSP products and services

Questions

5. *What specific criteria could be used to determine whether elements of the NECF (ie marketing code) apply to third parties providing DSP energy services to consumers? That is, beyond Australian Consumer Law?*

6. *What requirements should be in place for these third parties? For example, what should be the form of authorisations/accreditations?*

4.1 Question 5

Jemena supports a centralised accreditation process for third party providers of DSP energy services. We believe all parties offering DSP energy services directly to consumers should as a minimum obtain explicit informed consent and comply with the marketing obligations in NECF and Australian Consumer Law (**ACL**). Additionally, we support AER guidelines that sets criteria and outlines circumstances where accreditation (or exemption) of parties is required. The guidelines should also set out the relevant NECF market, enforcement and monitoring provisions that will apply.

The ongoing accreditation may be subjected to an independent audit regime of third party's processes and procedures to ensure compliance.

4.2 Question 6

Jemena considers the type of services provided by third parties should be the determining factor as to whether they should be authorised or accredited. There needs to be a clear distinction between services that affect the consumer's ability to get a reliable supply of electricity (e.g. services that include supply interruption) and those services that provide home energy management systems, displays and energy efficiency control. In our view, third parties who provide services that have the potential to interrupt supply should be made to seek some form of authorisation or accreditation.

Questions

7. *Do you agree that existing rules and guidelines should be amended to clearly outline the circumstances when distribution businesses are able to directly contract with residential and small consumers to deliver DSP network management services/programs?*

4.3 Question 7

Jemena does not agree that amendments to existing rules and guidelines are necessary. The DNSPs have to comply with the ACL in their dealings with consumers. Jemena believes that this requirement, along with existing rules and guidelines is sufficient. We are not aware of any evidence to date that suggests DNSPs have undertaken marketing services with respect to DSP network management services that warrants further regulatory intervention.

5 Chapter 4 – Enabling technologies for DSP

Questions

7. Should the minimum functionality specification for meters be limited to only those functions required to record interval consumption and have remote communication? Alternatively, should the minimum functionality include some, or all, of the additional functions specified in the SMI Minimum Functionality Specification?

5.1 Question 7

Jemena believes the National Electricity Rules (**NER**) should not limit the minimum functionality specification to only those functions required to record interval consumption and have remote communication. Jemena believes that the NER should include all the SMI Minimum Functionality Specification for the following reasons:

- Additional cost of energy management (Home Area Network (**HAN**) interface) and smart grid functions (mains contactor & quality of supply measurement) to a meter is marginal (as a guide less than $50);
- Long terms benefits are expected to exceed costs e.g. remote disconnect and reconnection reduces the cost of customer move-outs and move-ins, network outage detection, emergency load management;
- Adding smart grid functionality on an incremental basis after a meter is installed could be cost prohibitive;

Additionally, we propose the minimum functional specification in NER should:

- In the case of Victoria, specify that a third party can only replace an AMI meter with a meter of equal or better functional specifications – ie. accommodate the Victorian Government's specification;
- Define a common protocol for interfacing data (interval and control) between a Meter Provider (**MP**) and Meter Data Provider (**MDP**). Failure to do this may become a significant cost barrier to MP switching i.e. an MDP will need to customise their systems for each unique MP
- A common interface will also reduce the costs to retailers should a MP business fail.

Where energy management and smart grid functions are deemed to be optional, this should not preclude inclusion of the minimum specification for these services.

Under a jurisdictional arrangement, like the one Victoria, it would be a poor outcome if – following the end of the exclusivity derogation for the provision of metering services – retailers and third party meter providers could remove a Victorian AMI meter and replace it with an inferior meter that does not have the capability to enable smart grid functionality and the associated longer term customer benefits and improvements to network operations. Jemena is of the view that further analysis of the implications that each model will have on enabling smart grid functionality is required before deciding on the appropriate roll out model.

Questions

8. *Does the separation of the provision of metering services from the retail energy contracts remove the need for meter churn when a consumer changes retailer? Does this cause any unforseen difficulties or create any material risk? Are there any alternative approaches to reducing the need for meter churn?*

9. *Are there sufficient potential metering services providers to facilitate a contestable roll out of AMI? Does the proposed model mitigate all the material risks of a contestable roll out? If not, should a monopoly roll out be adopted?*

10. *What should the exit fee be when a consumer upgrades its meter from one provided by the local distribution business? Is the proposed fixed 30% of the cost of a replaced meter appropriate?*

11. *Does the option of a government mandating an AMI roll out within its jurisdiction act as a strong disincentive to a commercial roll out? Should the ability for these governments to mandate an AMI roll out be removed from the NEL?*

5.2 Question 8

Under the proposed model, the AEMC notes that in most circumstances, the retailer is responsible for ensuring the meter installation reflects the consumers' needs. If a consumer changes to a new retailer, the metering services contract will remain with the consumer – only the retail energy contract will change to the new retailer. If this is the case, Jemena considers the separation of the provision of metering services from retail energy contracts will remove the need for meter churn when the customer changes retailer.

The AEMC has addressed the issue of avoiding the need for meter churn when the consumer changes retailer (whilst contracted for meter provision services) however

it appears the AEMC has not considered the arrangements when a consumer moves premises. Will the new tenant pick up the contract for the higher meter provision charges or will the meter need to be removed and follow the consumer moving premises – with whom the original agreement was signed? Jemena considers that in this situation, there is no option but for the new consumer and retailer to take over the original metering contract at the site or arrange for a new meter installation – ie. meter churn.

In order to recover the cost of meter churn, the retailers who are responsible for metering are likely to include an exit fee in the metering contract. It should be noted that this will equate to consumers potentially having to endure bill shock, when moving out of a premise – similar to breaking a contract period on a mobile phone or cable TV connection.

5.3 Question 9

Jemena considers there are insufficient potential meter providers to facilitate a rapid contestable roll out of AMI. If not for the mandated roll out in Victoria, deployment of AMI would have been significantly slower due to the material risks that associate with a contestable roll out. Therefore, it is important to retain the ability of governments to mandate a roll out of AMI initially and the roll out should comply with the SMI Minimum Functionality Specification. The party undertaking the mandated roll out should be afforded a period of exclusivity during the roll out. This allows for a rapid roll out of AMI in a jurisdiction where the market for competitive metering is not deep.

In Victoria, beyond 31 December 2013 – the cessation of the exclusivity derogation for meter provision services for consumers consuming less than 160MWh per year – retailers will be able to offer remotely read interval meters to consumers. The draft report however, presumes that contestable metering and a partial roll out will serve consumers better in the long term than a monopoly roll out of meters. Jemena wishes to note however that under a retailer lead partial roll out, distributors will incur additional costs due to issues with meter registering and data streams and maintaining existing load control with a different meter. It could also be expected that increased manual meter reading costs as meter read routes become less efficient will create additional costs. Jemena does not oppose a contestable roll out, however it is important to recognise that there may be additional material costs under a partial roll out. Jemena request further consultation with the AEMC in relation to the application of these issues in the Victorian jurisdiction.

5.4 Question 10

Jemena queries the logic in setting a fixed exit fee at 30% when a consumer upgrades its meter from one provided by the DNSP, as the remaining economic life of the meter – its written down value (**WDV**) – is the true cost to be recovered due to the consumer for opting to upgrade. If these consumers were charged only a

fixed exit fee for a proportion of the WDV and the residual amount is then absorbed into the remaining regulatory asset bases, to be recovered through DUOS charges, then the remaining consumers are effectively cross-subsidising the individual consumer's decision to up-grade their meter. Jemena considers this to be poor policy not only on economic principle, but also from the view of equity in the provision of metering services to consumers. Moreover, causes the short term cost of the consumer wishing to upgrade the meter to be spread out over the remaining consumer base and paid off over a longer time period. Such an outcome is not efficient, and is unlikely to be in the long term interest of consumers.

Jemena considers the exit fee should be based on the average remaining life of the meter and the average cost of the replaced meter. The exit fee of meters provided by third party meter providers would be commercially agreed between the consumer and the third party meter provider. Any disputes, where a commercial arrangement cannot be reached, could be settled by the AER, subject to the principle that the remaining economic value of the meter, as well as any incremental costs caused by the switch, should be recoverable.

5.5 Question 11

Jemena believes governments should have the option to mandate an AMI roll out and therefore supports the retention of this ability in the National Electricity Law (**NEL**). In support of this position, please refer to our response to question 9.

6 Chapter 5 – Demand side participation in wholesale electricity and ancillary services markets

Questions

12. Participation in the wholesale market:

(a) Do stakeholders agree that the proposed demand response mechanism is likely to result in efficient consumption decisions by end users? If not, are there any changes you recommend to the mechanism to facilitate this?

(b) On balance, is a new sub-category of market generator required for consumers providing a demand that enables aggregation? What types of issues should be considered when developing the registration process?

13. Consumer baseline consumption:

(a) What factors should be taken into consideration when developing a baseline consumption method?

(b) Have we identified the correct three key principles for developing a baseline consumption method (data refresh, accuracy, metering)?

(c) Are there any substantial changes to metering and settlement arrangements required for this mechanism to be implemented? Can these issues be resolved through AEMO's consultation process and procedures or are broader amendments to the rules required?

Questions

14. Incorporating demand response into central dispatch:

(a) Do you agree that similar arrangements for generation should apply to demand resources in terms of thresholds for registering as scheduled or non-scheduled basis?

(b) What are the ways in which the regulatory arrangements can be adapted to facilitate the participation of scheduled and non-scheduled load in AEMO's central dispatch process? Are there any specific changes to reporting, telemetry and communication requirements?

(c) Should both market and non-market loads above a certain size be required to provide information to AEMO regarding their controllable (and therefore interruptible) load blocks?

(d) Should there be a trigger in the monitoring and reporting framework that requires consumers to provide greater detail regarding their demand resource to AEMO or affected DNSPs?

15. How should AEMO's powers be expanded to improve demand forecasting? Should retailers and other market participants be obliged to provide information regarding DSP capabilities? Will non-obligatory requirements achieve the desired accuracy in reporting requirements?

16. In what ways can AEMO improve its survey questions regarding DSP capabilities? How should AEMO be required to update its expectations on DSP capabilities in the NEM?

17. Would a pre-dispatch that includes active and price-responsive DSP improve decision making processes for C&I users and aggregators? If not, do you have any other suggestions for improving the ability for AEMO to accurately forecast demand?

The AEMC recommends a demand response mechanism that rewards changes in demand via the wholesale market. The proposed mechanism requires network tariffs to be based on actual meter reading but the retail tariff (energy only) be based on the baseline or calculated metering data (if there had been no demand response). This requires the bill to the consumer to have unbundled network and energy tariffs and charges.

Jemena considers the recommendation is more suited to large commercial and industrial consumers. Such a demand response mechanism could be adopted for residential and small business consumers, but we believe it will be a complex

process that will require extensive customer education to make sense of the various demand figures in play.

7 Chapter 6 – Efficient and flexible pricing options

Questions

18. *Do stakeholders agree with our approach for phasing in cost-reflective pricing? If not, how can the policy be improved to transition to cost-reflective pricing?*

19. *Have we identified the main issues with transitioning to cost reflective pricing? If not, what other issues need to be considered?*

20. *How should consumption thresholds be determined?*

21. *We seek stakeholder comments on appropriate pricing principles for distribution businesses and the appropriate time period for stakeholder consultation on distribution network pricing proposals.*

7.1 Question 18

Jemena is broadly supportive of the AEMC's approach of phasing in cost-reflective pricing. We believe cost-reflective tariff structures play a vital role in facilitating consumers' ability to manage their energy consumption.

The draft report proposes segmentation of residential and small business customers into three bands to allow a gradual phased approach to providing better price signals in the NEM. Jemena agrees that the key to successful implementation of time varying tariff structures in the residential consumer segments is to introduce these signals in an orderly, coordinated way whilst providing consumers the choice to participate or to remain on a flat tariff.

Jemena is of the view that the three banded approach is a careful step in the right direction. However we believe it could be simplified with only two consumer bands instead. The preferred band to remove is Band 3, which includes small to medium consumers who remain on a flat network tariff but have the option to opt-in to an offer that includes a time varying network tariff. The two-band arrangement would see all residential consumers assigned to a time varying network tariff – but importantly, still have the option to opt-out if they considered it were in their interest to do so.

Jemena sees this arrangement as an appropriate approach to implementing the time varying network tariff, whilst still allowing consumers the choice of flat network tariffs however they prefer.

Under the three tariff bands, there is another level of choice but it adds another level of complexity. Jemena believes that these tariff reforms must be simple for consumers to understand; they must offer consumers choices and empower consumers to take responsibility on how they manage their consumption. However, too many choices create unnecessary complexity and unintended barriers to adoption of time varying network tariffs.

7.2 Question 19

Jemena considers that the AEMC has identified many of the main issues involved in transitioning to cost reflective pricing however there are other issues that warrant further consideration. Under the approach described in the draft report, retailers are free to choose how to include the relevant network tariff into their retail offers. However, they are not obligated in any way to reflect time varying network tariffs in their retail offers. Retail businesses have the opportunity to pass the network tariffs through as a flat rate if they wish. They may do this in order to manage their price exposure to time varying volume risks imposed on them by networks.

Therefore, it could be anticipated that retailers will pass on a larger, flat network charge to consumers in their retail offers to manage these risks – unless retailers are obliged under the rules to closely align their retail tariff to the time varying network tariff. There are legitimate competitive pressures between the retailers that could see the networks' time varying tariffs be partially reflected in consumers' retail offers – however, if the AEMC is not confident that these pressures are sufficient, obliging retailers to pass these tariffs through would ensure that the changes are reflected as the policy is intended.

7.3 Question 20

Jemena notes that the draft report did not provide any clear direction as to how the consumption thresholds should be determined. There are a number of thresholds that are applied throughout various jurisdictions in the NEM – however none that are consistent across all jurisdictions. The NMI classifications in AEMO's Market Settlements and Transfer Solutions (**MSATS**) policies may provide a useful starting point for developing the thresholds.

Jemena would actively participate in further consultion further with the AEMC on determining the appropriate consumption thresholds.

7.4 Question 21

The draft report proposes that the AER establish distribution pricing principles that have regard to:

- a requirement for network tariffs to signal the time varying nature of network costs and in particular how consumers' demand drives network investment;
- the possibility that drivers for network costs differ to those for wholesale costs and thus a different tariff structure might be appropriate; and
- the range of possible different tariff options which provide a more efficient signal.

Jemena currently offers a range of time varying network tariffs that include demand components. Jemena does not support including further guidance by changing the pricing principles in the NER. The more guidance is prescribed, the greater the constraint on the DNSP to offer innovative tariff structures that meet consumers' changing needs and requirements.

Jemena already engages actively with consumers through our stakeholder consultative committee. This committee meets quarterly with representatives from consumer groups and larger customers to discuss tariff structures, other pricing arrangements and network issues. The draft report suggests that the AER may require a longer period to allow for consultation with external stakeholders on the structure of the network tariffs and that changes will be required to the annual tariff setting process to give the AER sufficient time to complete this extended role.

Jemena is not opposed to further in principle consultations with its own stakeholder groups to discuss network tariff structures however notes that the current submission timeframe is already very tight and it would be problematic if the submission timeframe were brought forward (to enable a longer consultation time). The only practical solution would be to extend the entire submission timeframe to allow greater consultation time for the AER and to ensure that the tight timeframes that exist for DNSPs are not squeezed tighter.

8 Chapter 7 – Distribution networks and distributed generation

Questions

22. Would it be beneficial to include reference to the suggested mechanisms and provide more guidance and an overall objective in the Rules governing the demand management incentive scheme?

23. Should separate provisions for an innovation allowance be included into the rules? Given that the costs of the allowance would be borne by electricity consumers, is it more appropriate for such innovation to be funded through government programs?

24. Should the provisions for a demand management incentive scheme be included in the regulatory framework for transmission businesses?

25. What amendments are required to the current distribution pricing principles as set out in clause 6.18.4 of the NER?

The draft report recommends that the AER considers reforming the application of the current DMEGCIS to provide an appropriate return for DSP projects that deliver a net cost saving to consumers.

Jemena confirms the views contained within the report that DNSPs need to receive a return on broad-based DSP initiatives at least equivalent to investing in traditional network infrastructure. Section 7A (5) of the Revenue and Pricing Principles in the NEL state that allowed expenditure for the provision of a network service should allow for a return commensurate with the regulatory and commercial risks involved in providing the relevant network service. The draft report correctly identifies that there are additional risks and uncertainties associated with DSP investments. DSP initiatives need to be incentivised so they are at least on a like for like basis with traditional network infrastructure investments.

The draft report acknowledges that to date the DMEGCIS has been applied in a very limited manner and that there is a need to develop an incentive scheme with a wider scope. The draft report also proposed principles and two mechanisms for how this could be achieved.

The first proposed mechanism provides a positive incentive payment to the DNSP that reflects a deemed share of the actual and future benefits of the DSP activity to the wider electricity supply chain and consumers. This payment is made where a

DSP project delivers sufficient wider market benefits. Jemena is broadly supportive of a scheme with these principles.

The second suggested mechanism has a reward payment that is made when corresponding net benefits to consumers are achieved. This mechanism involves coupling the incentive payment with the value of savings in capital infrastructure. The value of the savings – retained by the DNSP – depends on the number of years the business keeps the savings before passing them through to consumers. The draft report notes that in the absence of an efficiency benefit sharing scheme (**EBSS**) for capex, this is constrained by the number of years remaining in the five year regulatory period.

Jemena is concerned, that under the second mechanism, a direct correlation exists, where a DNSP will be less motivated to pursue efficient DSP when the business' share of the savings decreases. As the share of savings is linked to the remaining years in the regulatory period, there is a diminishing incentive to make savings as the regulatory period progresses. This is a particularly weak element of the incentive scheme design as business should be encouraged to make these savings at any time within the regulatory control period.

The draft report also recommends a two-part approach to address the issue of business profits being dependent upon actual volumes. Firstly through improvements to the pricing principles to guide network tariff structures and secondly through the inclusion of an allowance for foregone revenue under the DSP incentive scheme. Jemena is supportive of recommendations in the paper for the AER to consider expanding the current application of the foregone revenue component of the demand management incentive scheme to also cover DSP projects. However, we do not support prescribing more guidance and amending the pricing principles in the NER. The greater the level of prescription in the pricing principles with regard to setting network tariff structures – the greater the constraint on the business to develop innovative pricing structures that meet consumers changing needs.

Jemena considers that it is not necessary to include provisions for a demand management incentive scheme to be included in the regulatory framework for transmission businesses. As Transmission Use of System (TUoS) charges are reflective of the highest capacity used by a DNSP, transmission businesses have little ability to control their load in this regard and therefore contribute to demand management.

In answer to question 25, Jemena refers to the report commissioned by the ENA from PriceWaterhouseCoopers (PwC) titled 'Incentives for network driven DSP'. A copy of the report is attached to the ENA submission to this draft report. Jemena would like to indicate our intent to engage with the AEMC on any amendments that are proposed to be made to the RPP.