



13 February 2020

John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

Project Reference Code: ERC0275

Dear John

Re: Introduction of metering coordinator planned interruptions

CitiPower, Powercor and United Energy welcome the opportunity to respond to Australian Energy Market Commission's (AEMC) draft decision on the introduction of metering coordinator (MC) planned interruptions.

We broadly support the draft decision to allow MC planned interruptions as it improves outcomes for customers on shared fuses that are switching to smart meters or have faulty meters. However, in Victoria the number of customers with contestable meters on shared fuses is expected to be very low. Therefore, the final rule should assess the cost of implementation of the rule to all customers against what is expected to be marginal benefit in Victoria.

Our submission raises concerns over the proposed timeframes in the draft rule and proposes the following alternative positions which deliver benefits at lower costs to consumers:

- timeframes for provision of shared fuse information to the Australian Energy Market Operator (AEMO) should be extended to after 1 July 2021
- planned interruptions timeframes should be increased by five business days to 35 business days.

Provision of shared fuse information should be implemented after 1 July 2021

The draft rule introduces a requirement for distributors to collect and provide shared fuse information to AEMO as far as reasonably practicable from 26 June 2020. To enable this functionality, we would be required to update our B2B systems as well national metering identifier (NMI) information in our Market Settlement and Transfer Solution (MSATS) systems. We estimate each update to the systems to cost more than \$0.5m per network.

We can achieve more cost effective solutions by aligning this upgrade with upgrades resulting from other new regulatory obligations, such as the upgrade expected to take place for the 5-minute and global settlement rule change starting from 1 July 2021. Equally, AEMO is currently reviewing standing data requirements for MSATS that are likely to take effect from or after 1 July 2021.

We therefore consider customers would be paying excessively for us to implement system upgrades by 26 June 2020 given other upgrades that will become effective on or after 1 July 2021. These additional costs outweigh the benefits to customers from retailers and MCs having shared fuse information through AEMO for those first 12 months. We propose this element of the rule should be pushed out to after 1 July 2021, to ensure we can deliver the necessary information to AEMO, retailers and MCs at least cost to customers.

The planned interruptions timeframes should be increased by five business days to 35 business days

The draft rule introduces a 30 business day timeframe for retailers and MCs to install new meters or rectify metering malfunctions for customers with shared fuses (without an exception from AEMO). Within the 30 business day window, the distributor must carry out the interruption within 25 business days to meet the

retailer's or MC's timeframe requirements. However, there are a number of limitations for distributors to carry out this interruption within 25 business days:

- distributors must engage a connections technical advisor to visit the site before the interruption to assess the shared fuse. Typically these advisors are given at least 10 business days' notice for site visits, after which there would only be 15 business days for the planned interruption.
- it may not be achievable for the distributor to meet the predetermined date agreed between the retailer/MC and the customer, leading to renegotiations of timeframes and reducing the distributor's ability to meet its obligations within 25 business days.
- if the shared fuse connection includes customers with special needs, such as life support customers or commercial customers that prefer interruptions outside of their business hours, this will add to the complexity of the planned interruption and make it harder to meet the required deadlines.

We therefore propose the rule is amended to increase the planned interruptions timeframes to 35 business days, to allow distributors at least 30 business days to carry out the planned interruption. The 35 business day timeframe should begin from the latest agreed date with the customer to allow for flexibility to re-negotiate the date of the interruption in response to its customers' needs. While this amendment may extend the time required for the customer on a shared fuse to receive a new meter, it allows reasonable time for a safe and achievable distributor planned interruption, particularly for customers with special needs.

Should you have any queries about this letter please do not hesitate to contact Sonja Lekovic on (03) 9683 4784 or slekovic@powercor.com.au.

Yours sincerely,



Brent Cleeve
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