

7 February 2020

Mr John Pierce
Chairman
Australian Energy Market Commission
Level 6, 201 Elizabeth Street,
Sydney NSW 2000.

Submitted online: www.aemc.gov.au/contact-us/lodge-submission
Your reference - ERC0275

Dear Mr. Pierce

AEMC Rule Change Draft Determination: Introduction of Metering Coordinator Planned Interruptions

Thank you for the opportunity to provide a submission in response to the Australian Energy Market Commission's (AEMC) Rule Change Draft determination covering the National Electricity Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule 2020 and the National Energy Retail Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule 2020.

Momentum Energy is a 100% Australian-owned and operated energy retailer. We pride ourselves on competitive pricing, innovation and outstanding customer service. We retail electricity in Victoria, New South Wales, South Australia, Queensland and the ACT. We offer competitive rates to both residential and business customers along with a range of innovative energy products and services. We also retail natural gas to Victorian customers.

Momentum Energy is owned by Hydro Tasmania, Australia's largest producer of renewable energy.

Generally Supportive of Alternative Solutions and Draft Rule

Momentum Energy agrees with the AEMC's assessment that the proposed draft rule put forward by the Competitive Metering Industry Group (CMIG) did not appropriately address the situation where shared fusing exists at multiple sites supplied by different retailers. The additional complexities for sites, with shared fusing, requires the mandated involvement of the Distributor, who has access to the relevant customer data and in some cases owns the relevant isolating assets.

Based on our initial assessment of this issue we believed that the rule change solution was relatively simple. However, the industry workshop conducted by the AEMC and the consultation process revealed the additional matters related to sites with shared fusing, customer information asymmetries, and regulated timelines for planned meter installations.

Therefore we applaud the AEMC's approach to this rule change and fully support their proposed alternative draft rule as it addresses all sites and includes an amendment to the metrology procedure requiring distributors to progressively record shared fusing information. Going forward, this information will assist metering coordinators (MCs) and retailers to identify shared fusing, prior to visiting these sites, resulting in improved efficiencies for MCs and enhanced customer experiences.

Specific aspects of the AEMC alternative solution that will support positive outcomes for customers and market participants include:

- Regulated timelines (30 business days) for retailers and MCs for meter installations where an interruption to other customers is required, together with a regulated timeline (25 business days) for the distributor to coordinate a planned interruption activity when requested by a retailer;
- Minor rule changes that provide clarity allowing retailers to interrupt supply to any of its own customers for metering activities;
- Changes to rules that will cause amendments to metrology procedures requiring market participants to record sites with shared fusing as soon as practical after they are identified;
- Changes to information provision, regarding shared fusing sites, when distributors are advising retailers of metering malfunctions; and
- Changes to information provisions for retailers, requiring them to include in their planned interruption customer notice whether the purpose of the interruption is for a meter installation, replacement or repair of the customer's meter or for another customer such as when a shared fuse exists.

Should you require any further information regarding this submission, please don't hesitate to contact me on 0478 401 097 or email randall.brown@momentum.com.au

Yours sincerely

[Signed]

Randall Brown
Regulatory Manager