

13th February 2020

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Australian Energy Market Commission
Level 6 201 Elizabeth Street
Sydney, NSW, 2000

Lodged online: www.aemc.gov.au

RE: AEMC Rule Change Draft Determination: ERC0275 – Introduction of Metering Coordinator Planned Interruptions

Powermetric welcomes the opportunity to make a submission to the Australian Energy Market Commission's (AEMC) Draft Rule on the Introduction of Metering Coordinator Planned Interruptions.

About Powermetric

Powermetric Metering Pty Ltd (Powermetric) is an Australian Electricity Market Operator accredited Metering Provider and Metering Data Provider and registered Metering Coordinator operating in Australia's National Electricity Market. Powermetric, which is wholly owned by ERM Power Limited, offers a range of products and services including installation, testing, maintaining and reading meters for corporate, government and industrial electricity customers. Powermetric's systems are specifically designed to help large electricity users manage their complex electricity needs.

General comments

Powermetric recognises AEMC's concerns around customer protections but feels more could have been done to overcome these concerns.

Powermetric also believes there is little benefit for Metering Coordinator on the proposed changes and we would like to see further enhancements in these rule changes to reduce the cost to future customer metering works.

Opportunity to enhance the Draft Rule

Powermetric is concerned that every time a customer or retailer requests metering works on a meter with shared isolation points there is a minimum of three site visits required in order to carry out those works.

To reduce the number of meters with shared isolation points Powermetric suggests implementing a regulatory obligation for the network businesses to use reasonable endeavours to install isolation points on all customers affected by shared isolation during the first interruption.

The benefits of this obligation would be:

- Costs would be reduced for energy consumers by resolving all of the isolation issues for a site during initial meter install once and for all.
- Existing network regulatory cost recovery mechanisms can be used to ensure network businesses are compensated for the efficient delivery of the service to install isolation.
- The need to record customers affected by shared isolation would be reduced meaning that a process to notify retailers and metering coordinators and record by networks would not be required.
- The need for coordinated site visits by network and metering field crews would be significantly reduced (but not eliminated dependent on the complexity of the site). The meter could be installed at the time of the initial interruption or after the isolation points have been installed. Any further interruptions for meter installations at the site would only affect the customer receiving the meter.

If you have any questions in relation to this submission, please contact the undersigned.

Yours sincerely,



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