

13 February 2019

John Pierce  
Chairman  
Australian Energy Markets Commission  
PO Box A2449  
Sydney South NSW 1235

Locked Bag 14051  
Melbourne City Mail Centre  
Victoria 8001 Australia  
T: 1300 360 795  
[www.ausnetservices.com.au](http://www.ausnetservices.com.au)

Reference code: ERC0275

Dear John,

**Draft Rule Determination: Introduction of metering coordinator planned interruptions**

The metering coordinator planned interruptions draft rule proposes to address more immediate issues that are impacting customers in jurisdictions where contestability for smart metering is applied and shared fusing is still prevalent. In Victoria, Distribution Networks Service Providers (DNSPs) are currently the exclusive provider of smart metering for small customers, where we are not for customers that consume more than 160 MWh per year.

For AusNet Services' network area, shared fusing arrangements are extremely rare. Network technical standards have required the installation of individual fuses to connection points for more than 30 years. Additionally, during our AMI meter roll out many shared fusing arrangements were rectified, when we assisted thousands of domestic and small business customers in making their metering installation to be compliant with safety and technical standards.

The metering coordinator planned interruptions draft rule would shift some of the responsibility of identifying and rectifying shared fusing arrangements from the metering parties to DNSPs. The implications for AusNet Services would be establishing costly B2B process and system changes for the unlikely situation where we identify a site on a shared fuse or are called by a metering coordinator or retailer.

A better alternative may be the development of changes to AEMO facilitated market systems that facilitate the cooperation of works and supply interruptions between multiple retailers. This change could be as simple as NMI discovery that reveals to one retailer nearby sites and the assigned retailers. Current controls that prevent the use of information obtained using NMI Discovery from being used marketing purposes should be adequate in preventing competition issues. This would not require a rule change and would avoid the need for costly changes by all DNSPs and retailers.

AusNet Services is, therefore, not supportive of the proposed alternative metering coordinator planned interruptions draft rule.

If you have any queries on our submission, please do not hesitate to contact Justin Betlehem on 03 9695 6288.

Yours sincerely,



Charlotte Eddy  
**Manager Economic Regulation**