



13 February 2020

Mr Ed Chan  
Director  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Email: [aemc@aemc.gov.au](mailto:aemc@aemc.gov.au)

Dear Mr Chan

**RE: ERC0275 Introduction of metering coordinator planned interruptions**

Origin Energy appreciates the opportunity to respond to the AEMC's draft decision *Introduction of metering coordinator planned interruptions*.

Origin supports the AEMC's more preferable draft rule to introduce timeframes for the installation and repair of meters at premises with shared fusing. However, we consider that the new timeframes should extend to all situations where a Metering Provider cannot isolate a meter. We consider that this approach will support the more efficient installation of a smart meter while maintaining the appropriate level of customer protections.

Origin's views on these issues are set out below.

**Ensuring each meter is able to be isolated**

Origin considers that the most efficient way to ensure that customers can access the additional benefit of smart meters in a timely manner is to ensure that all meters are able to be effectively isolated. The current AEMC more preferable rule resolves circumstances where there is a shared fuse. That is, the draft rule imposes timeframes when the circumstance 'requires interrupting supply to another retail customer'.

However, we do not believe this covers circumstances when the Metering Provider (MP) cannot isolate the meter where there are no additional customers affected. This occurs when a site does not have a fuse or isolation point, or the isolation point is not accessible by the MP.

At present we understand that there are no time obligations on the distribution business to resolve the meter isolation issue in this circumstance. As a result, this can lead to significant delays in isolating the site and installing the meter.

To resolve this issue, Origin proposes extending the timeframes to capture all circumstances where a MP cannot isolate the meter. We believe that this will result in a consistent treatment of isolation works and would result in the provision of more efficient metering services.

**Updating information where there is shared fusing**

Origin supports the AEMC's draft decision to require distribution businesses to include shared fuse data in the customer site details. However, we consider that the proposed changes to the Rules should also require more specific and functional information being included in the site details (e.g. sites that share the same fuse).

Origin considers that the fuse detail flag should identify which additional addresses share the fusing, to allow the retailer to identify whether it is also the FRMP for the additional site(s) and thus avoid unnecessary future requests to the distribution businesses. We consider that the inclusion of this information would also allow customers to avoid incurring delays and additional fees where there are a small number of sites, for example a house and a granny flat which may be supplied by the same retailer under different customer names.

We consider that this information would aid in the efficient notification to customers, since retailers also have an obligation to provide notice of the outage to affected customers and this information could be made available in advance.

Origin believes it is imperative that a specified timeframe from 'becoming aware' of shared or no fusing at a site to 'entering the information' into MSATS be included in the Rules. This would avoid creating an incentive not to enter the information, in order to delay the commencement of works. We consider it would be reasonable that the distribution business be required to update MSATS within 5 business days of receiving this information, either from market participants or via distribution business site visits.

### **Implementation timeframes**

The AEMC has proposed two dates for implementation. The earlier date of 26 March 2020 includes the application of changes to Chapter 7 and NER clause 11.86.7 and NERR sub-rule 59C and 91A.

The AEMC also proposes that the changes to MSATS procedures, which would capture information regarding shared fusing, commence on 26 June 2020.

Origin considers that the three-month timeframe between March and June is not sufficient to successfully design, test and implement both MSATS changes and the stakeholder interfaces. Depending on the approach taken, the interface into user systems may need to occur after the changes to MSATS for appropriate testing to be undertaken

Origin also considers that the implementation of Rule 91A may take longer than one month, as retailers must allow for:

- appropriate processes to be developed between all market participants, (including additional reporting fields between Metering Providers, Metering Coordinators and Retailers);
- existing backlogs (which extends to April) to be resolved; and
- continued inability to identify requests affected by shared fusing until the second portion of the rule change is completed.

The stepped approach to implementation also raises challenges regarding visibility of fuse detail, where timeframes exist to complete works. Until the MSATS updates are complete, stakeholders may struggle to meet the timeframes because of an information vacuum. We do not consider that distribution businesses or other market participants should be in breach of the new rules where existing conditions do not allow for their initial compliance.

In light of this, Origin suggest a 6-month transitional period apply while the resulting interface between distributor interruptions and customer initiated metering requests is developed. We also consider that a transitional period would assist in accounting for the lack of information regarding shared fusing that is currently available, while ensuring that the customer experience can be effectively managed while this information is being collated.

*Closing*

If you have any questions regarding this submission, please contact Courtney Markham in the first instance on 03 9821 8086 and or [Courtney.Markham@originenergy.com.au](mailto:Courtney.Markham@originenergy.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sean Greenup', written over a light grey rectangular background.

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