



6 January 2020

Alisa Toomey
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Alisa,

Draft Determination (Introduction of Metering Coordinator Planned Interruptions - ERC0275)

The Intellihub Group welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) draft determination on the Introduction of Metering Coordinator Planned Interruptions – ERC075.

Intellihub Group supports the rule change as proposed by the Chair of the Competitive Industry Metering Group as we believe that barriers slowing down the rollout of smart meters should be removed where safe to do so. The risks put forward by other stakeholders of which seems to have influenced the overall outcome of this draft determination can be overcome a number of ways and therefore Intellihub provides the following:

- **the lack of a contractual relationship between the MC and customers**

Why does there need to be a contractual relationship between the MC and the customer? There is no such relationship today. These contractual relationships are between the retailer and the MC. It is agreed in advance with retailers what MCs can and cannot do with each retailers' customer.

- **customer recourse is limited if supply is not restored within timeframes or if planned interruption notification requirements are not followed and customers are unable to access dispute resolution in relation to actions undertaken by MCs**

Dispute resolution can be managed either via the retailer or as suggested by most other stakeholders, MCs could register with the energy ombudsman schemes. Just because something seems a little complicated it should not be overlooked for the greater good of increasing smart meter rollout programs.

- **customers may ignore, or be confused by, planned interruption notices from MCs as they will not know who the MC is**

This comment has very little merit. I have personally worked for a DNSP for over 15 years and most customer

do not know who the DNSP is, inferring confusion by an MC outage notice is drawing a long bow. Regarding a comment made in reference to not use retailer branding, again this is contradictory to what we do today, notices are left to customers today by the MC on behalf of the retailer. The same methodology would apply here.

- **Some MCs are likely to have less access to customers' data and life support information than retailers or DNSPs**

Intellihub is confused with this comment and believes that parties are clutching at straws to deliberately slow this down. Each MC that intends on conducting these outages should have commercial agreements in place with each retailer present on site. This agreement would cover off the need to exchange/request life support information before an outage is entertained. Endeavour Energy's comment regarding potential registration of a Life Support customer in between when the MC raises a request via B2B and when supply interruption is carried out, exists today between retailers and DNSPs.

- **privacy concerns with MCs accessing customer data where they do not have a relationship with the customer**

MCs do not have relationships with customers to date. The relationship is with the retailer and as stated above, if there are no commercials in place with each retailer on site to conduct these activities on behalf of the retailer then the work does not proceed, and the information is not sort by the MC from the retailer.

- **situations may arise where the MC is unable to restore the customers' supply in a timely manner**

Understood albeit it very rare, there would be an expectation as there is today that the MC would engage the DNSP and remain on site until the DNSP arrives to address the concern.

- **site visits would only be saved if the other impacted customers are home at time of the installation attempt**

This statement may be somewhat true dependant on the commercial arrangements each MC has with each retailer. Having said that the proposed rule change is not looking not necessarily looking for a silver bullet in every instance but alternate options to help expedite the meter roll out program.

- **there are other isolation issues that the rule change would not solve.**

Understood, just because this proposed rule change does not solve for every instance, I'm not sure that it should be discounted entirely. This infers that the rules as they are written today cater for every instance and they do not.

The Intellihub Group would welcome any further discussion in relation to this submission. If you have any questions or wish for further discussion, please contact Robert Lo Giudice on 0419 539 638 or at robert.logiudice@intellihub.com.au.

Sincerely,

Robert Lo Giudice

Manager, Metering Coordinator & Operations - Intellihub Group