

Australian Energy Market Commission  
PO Box A2449  
SYDNEY SOUTH NSW 1235  
Attention: Alisa Toomey

Lodged online: [www.aemc.gov.au](http://www.aemc.gov.au)

13 February 2020

### **Introduction of Metering Co-ordinator Planned Interruptions**

The Australian Energy Council welcomes the opportunity to make a submission to the AEMC consultation on the introduction of metering co-ordinator planned interruptions.

The Australian Energy Council (AEC) is the industry body representing 23 electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. These businesses collectively generate the overwhelming majority of electricity in Australia and sell gas and electricity to over 10 million homes and businesses.

The AEC has considered the preferred rule proposed by the AEMC in the draft determination. This draft has been the subject of industry review across both networks and retailers, coordinated by the Competitive Metering Industry Group (CMIG). As a result of this review the AEC supports further change to the proposed approach in support of CMIG. This requires that consideration be given to:

1. Creating an 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 to 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 effected by shared isolation would be reduced meaning that a process to notify by 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 reduced (but not eliminated dependent on the complexity of the site). The meter could be installed either 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 then only affect the customer receiving the meter.
  
2. Change the requirements for time frames with which retailers and networks must comply.

- The complex nature of the shared isolation environment often means negotiation is required to find a time that is convenient for all customers affected to carry out the interruption.
- The use of the existing timeframe obligations under the rules will mean the energy consumer requesting the meter installation will be the focus of the time frame potentially placing the other affected customers in a position where they will not be able to negotiate when the interruption can occur, in as much as:
  - The 30 day timeframe placed on the network to complete the work basically prohibits retailers whose customers are also affected to undertake a retailer new meter deployment (under rule 59A), and;
  - This rule requires retailers to provide a notice no earlier than 60 Business Days and no later than 25 Business Days before planning on putting in a new meter. And then another no earlier than 10 business days. And the customer can opt out.
- We therefore recommend either removing the timing provision, or extending it to allow for retailers to conduct their due diligence and processes under rule 59A (civil penalty provision clause).
- The AEC also recommends strengthening the obligation on the network to tell all the affected retailers, in order for them to be able to explicitly make that call. This could be achieved through the B2B Procedures (and therefore requires time to implement).

3. Create requirements to use market B2B processes to inform participants of interruptions of customers on shared isolation.

- The existing typical network process for advising customers involves dropping a card in the consumers letterbox and nominating a date and time for the interruption. Retailers are typically advised of this through updates to the network outages web page.
- The introduction of a requirement for the network to proactively advise participants via B2B of an interruption of consumer will create the opportunity for retailers to take advantage of the interruption to have a new meter installed.

Any questions about our submission should be addressed to David Markham by email to [david.markham@energycouncil.com.au](mailto:david.markham@energycouncil.com.au) or by telephone on (03) 9205 3107.

Yours sincerely,

**David Markham**  
 Corporate Affairs  
 Australian Energy Council