

12 July 2018

Mr John Pierce
Chair
Australian Energy Market Commission
PO BOX A2449
Sydney South NSW 1235

Via online submission

Dear Mr Pierce,

RE ERC0236 – National Electricity Amendment (Metering Installation Timeframes) Rule 2018

TasNetworks welcomes the opportunity to make a submission to the Australian Energy Market Commission (**AEMC**) on the National Electricity Amendment (Metering Installation Timeframe) consultation paper.

As the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and jurisdictional planner in Tasmania, TasNetworks is focused on delivering safe and reliable electricity network services while achieving the lowest sustainable prices for Tasmanian customers. This requires the prudent, safe and efficient management and development of the Tasmanian power system. In this regard, TasNetworks would like to make several comments on metering installation timeframes with a particular focus on the Tasmanian context.

Meter Installation Timeframes

As acknowledged in the consultation paper, the process complexity and coordination issues resulting from the contestable metering rule changes have meant customers are experiencing poorer metering outcomes. TasNetworks is, therefore, appreciative of the AEMC's efforts to improve this situation but notes that the rule change, somewhat confusingly, seeks to both shorten (new installation) and lengthen (faulty) metering timeframes. TasNetworks considers that customer outcomes should be of primary importance but acknowledges sufficient flexibility needs to be given by the rules to allow for rarer, more complicated metering works. In this respect, TasNetworks suggests that harmonising the allowable completion timeframes for different metering work and supplementing them with an incentive and/or penalty regime to promote faster meter installation timeframes, would be beneficial.

Shorter Planned Interruption Notice

TasNetworks supports allowing customers to schedule an alternative date with a retailer for a planned interruption inside the traditional four day window and considers this will improve customer outcomes. As noted in the competition in metering final rule determination, it was the AEMC's stated

intention that rules relating to planned interruptions should be applied equally to both distributor and retailer planned interruptions. However, owing to different jurisdictional derogations between retailers and distributors, this intention has not been fulfilled.

TasNetworks understands there are existing derogations related to retail and distributor planned interruptions for New South Wales, Queensland and South Australia. In addition, there is a forthcoming distributor derogation for planned interruptions in Tasmania. TasNetworks considers there would be administrative benefits to harmonising these arrangements by formalising planned interruption notices for both retailers and distributors within the rules. TasNetworks therefore strongly supports customers being allowed to schedule an alternative date with a distributor, as well as a retailer, for a planned interruption inside the traditional four day window.

TasNetworks considers that these notice options should be offered to all customers, including life support customers. Similarly, flexibility in the method for agreeing to alternate planned interruption dates is likely to promote the best customer outcomes. That is, agreement recorded with a retailer, distributor or metering coordinator in writing or via electronic communication should be options supported by the rule change. Verbal agreement should also be allowed so long as the agreement is evidenced in such a way that it can be verified at a later date, e.g., a recording of the conversation.

A key addition to the proposed Tasmanian distributor derogation has been the term co-habitant. This is a person, other than the customer, aged 18 years or older, who lives at the premises and who can provide consent to a shorter planned interruption notice. This was added to promote flexibility in agreeing to shortened notice in those situations where the customer does not live at, or is temporarily away from, the premises. TasNetworks suggests that similar terminology and flexibility be considered for incorporation with this rule change.

Other proposed amendments to the Tasmanian distributor derogation include an exemption from providing notice where the planned outages is expected to last no longer than 15 minutes; an obligation for the distributor to keep a record of the shortened notice agreement for at least 2 years; and the obligation for the distributor to provide a copy of the agreement at no charge to the customer if requested. Similar considerations might be useful additions to this rule change.

TasNetworks would welcome the opportunity to discuss this submission further with you, including fuller details of the forthcoming Tasmanian distributor derogation and suggestions for improving metering installation timeframes. Should you have any questions, please contact Tim Astley, Team Leader NEM Strategy and Compliance, via email (tim.astley@tasnetworks.com.au) or by phone on (03) 6271 6151.

Yours sincerely,



Wayne Tucker

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