



Ausgrid Submission

AEMC draft rule determination – metering installation timeframes
October 2018



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Attn: Ms Jess Boddington
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

Lodged online

Dear Ms Boddington

Ausgrid is pleased to provide this submission to the Australian Energy Market Commission (AEMC) draft determination for metering installation timeframes (the draft decision).

Since 1 December 2017 there have been many reports of poor customer outcomes in relation to the provision of new meters. As the AEMC points out in its draft decision, this rule change will result in better customer outcomes by giving customers more certainty about when their meter will be installed.

This submission provides high level views on a number of issues that are of relevance to Ausgrid, such as the role of accredited service providers in NSW.

Should the AEMC have any questions in relation to this submission, please contact John Skinner, Regulatory Policy Manager on 02 9269 4357 or john.skinner@ausgrid.com.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Iftekhar Omar", written in a cursive style.

Iftekhar Omar
Head of Regulation

Submission

Customers must have confidence in the service they will receive from energy providers in order to adopt new products and services. This is especially the case for electricity meters, which play a pivotal role in helping customers manage their energy use.

Since 1 December 2017 there have been many reports of poor customer outcomes in relation to the provision of new meters. The AEMC's draft determination will help improve the customer experience by giving customers more certainty about when their meter will be installed.

This submission provides high level views on a number of issues that are relevant to Ausgrid. Ausgrid suggests that these issues be addressed in the AEMC's final decision.

The role of accredited service providers in NSW

In NSW, connection services are generally provided by Accredited Service Providers (ASPs) who are directly engaged by the customer rather than the local distribution network service provider (DNSP). The ASP scheme rules are managed by the NSW Department of Planning and Environment and are established under Part 3 of the *Electricity Supply Act 1995* (NSW).

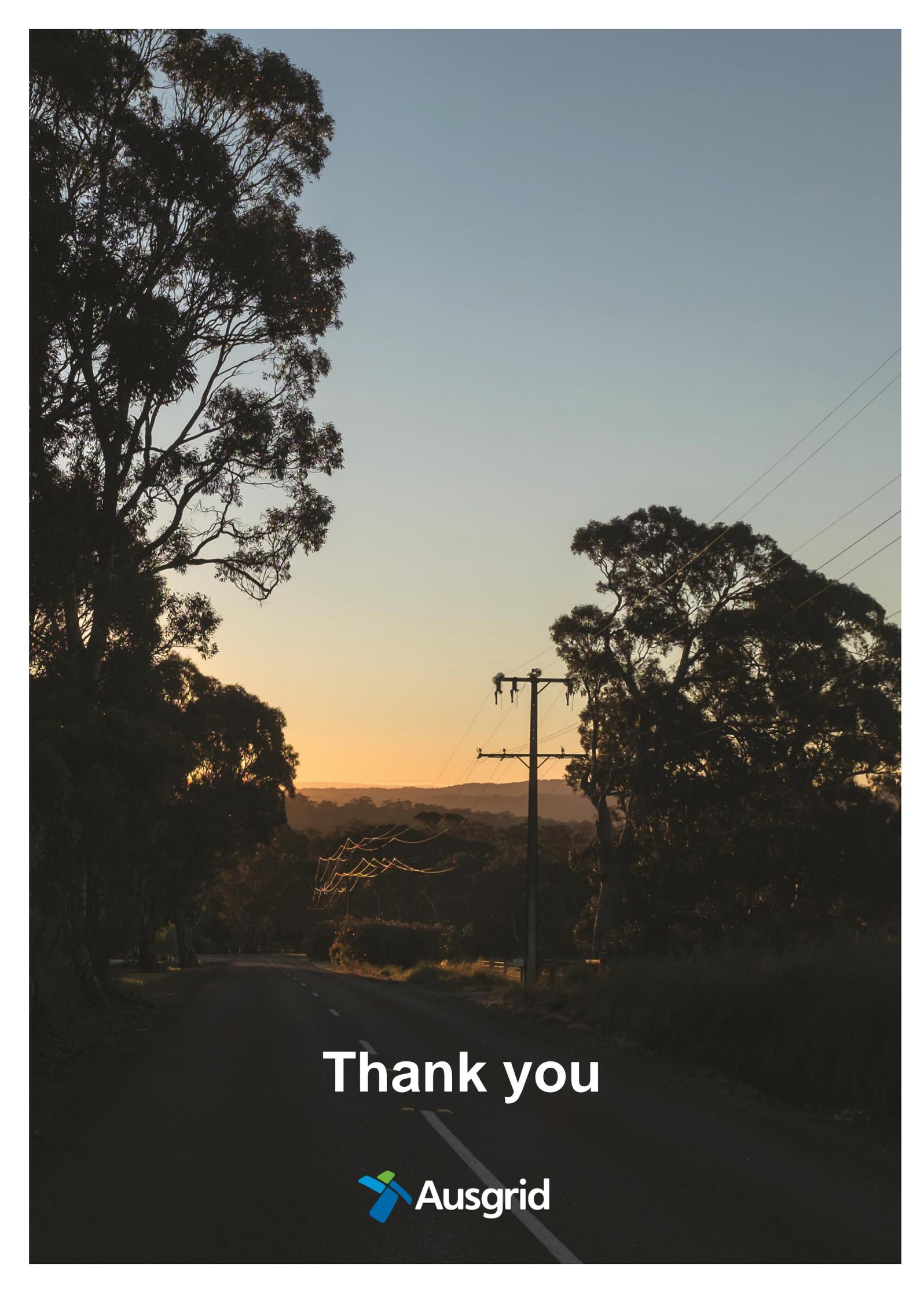
Due to the role of ASPs in providing connection services in NSW, many of the provisions of the draft rule do not apply to the NSW DNSPs, although this is not clearly drawn out in the draft determination. Ausgrid requests that the AEMC clearly outlines which components of the new rule apply to a DNSP where the ASP scheme operates.

For new connections, the involvement of DNSPs is largely limited to allocation of National Meter Identifiers (NMIs) into the market on behalf of the retailer. The DNSP has no involvement in the physical installation or connection process except to ensure that safety standards of the network connection are maintained. Ausgrid operates an installation inspection audit regime to inspect the work of ASPs and ensure that safety standards are maintained.

With requests for alteration of connections in NSW the customer engages an ASP to conduct any service alteration works. The only involvement from a DNSP's perspective is to review (and approve if accepted) the alteration upon receipt of a connection alteration request from the customer's agent.

The proposed clause 7.8.10C which deals with these situations implies that the retailer meets its obligations under the proposed rule simply by informing the DNSP. This may not achieve the desired outcome under the ASP scheme as the DNSP will not be in a position to (and should not be) responsible to coordinate the metering installation with the ASP on behalf of the retailer.

When a customer requests alteration services directly from a retailer, there may be merit in including an obligation on the retailer to interact with and inform the appointed ASP or customer's agent.

A scenic landscape at sunset. The sky transitions from a pale blue at the top to a warm orange glow near the horizon. Silhouetted trees frame the scene on both sides. A utility pole with power lines stands in the middle ground. The overall mood is peaceful and serene.

Thank you

