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Australian Energy Market Commission
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About the submitter

The Competitive Metering Industry Group (CMIG) Represents the accredited metering service providers currently providing metering installation services in the NEM. The CMIG works to promote the development of an efficient, effective and nationally consistent competitive metering market in the NEM by representing the metering industries views on policy and regulation to government, regulatory and industry bodies while supporting the development and publication of:

- Metering equipment standards that are relevant for the Australian environment but align to international standards where ever possible.
- Technical standards for metering installations.
- Safe work guide lines and practices.
- Coordinated industry representation on appropriate committees.
- Industry coordination of securing metering installations (Metering Keys and Sealing)

Effective October 2018, the CMIG member organisations have joined Master Electricians Australia and the CMIG has been convened as a sub-branch of Master Electricians Australia

Master Electricians Australia (MEA) is the nation's leading advocate for improved quality, safety and efficiency in the electrical contracting industry. MEA have members in every state and territory, giving it direct experience in navigating jurisdictional regulatory regimes. MEA is an experienced and trusted adviser to governments and regulators on industry issues.

Comments on draft determination

The CMIG commends the AEMC on focusing the metering installation time frame rule change on engaging with energy consumers to agree an installation date. CMIG's members are committed to ensuring energy consumers metering is delivered in a timely manner. However, the experience of CMIG members since the commencement of the metering competition rule change has highlighted that many things can happen to prevent a meter being installed on a specific date.

CMIG members are currently installing approximately 2000 meters per day across the NEM with around 500 technicians on the road on any given day. The provision of field installations services is a highly dynamic environment that is impacted constantly by things like, weather, traffic, and unexpected conditions found on sites creating longer install times. For example, if a technician finds a hazardous situation on a site when installing a meter, they are typically required stay on site while the hazard is investigated and corrected. This will impact the technician's subsequent appointments on that day. It must also be remembered that metering installations occur in a largely uncontrolled environment where

it can be difficult to predict what will be encountered during the meter installation.

While metering equipment is installed by AEMO accredited metering providers under the NEM rules, installers are also licensed electrical workers and contractors with obligations under jurisdictional regulations. CMIG members are concerned that the AEMC's current focus in the draft rule on agreeing a specific date with a customer coupled with the requirement to install a meter in 6 or 15 business days if a date cannot be agreed with a customer, may create an environment that places pressure on electrical workers to carry out metering works in scenarios that could be considered unsafe or in breach of their licence obligations. Our members' experience in installing meters across the NEM has found that a significant percentage of metering installations present compliance challenges for our members' electrical workers health and safety and licence obligations. These challenges include things like inability to isolate supply, presence of asbestos, insufficient space to install equipment, no clear access or no safe access to the metering installation.

The recent review in to [Retailers' metering practices in NSW](#) by the Independent Pricing and Regulatory Tribunal explored some of the challenges typically faced when installing meters and has made some recommendations that CMIG encourages the AEMC to consider in its final rule.

The CMIG requests that the AEMC consider incorporating more flexibility in its final rule by allowing for the option of agreeing a **"date range"** with a customer or a specific date if a range is not acceptable to the customer. The CMIG believes a **"5 business day window"** agreed with a customer for a meter installation would set an appropriate customer expectation and provide the flexibility to accommodate the highly dynamic environment CMIG members experience when installing meters across the NEM. The requirement for outage notifications in Rule 59C should be adjusted to also match the date range.

The CMIG is currently working closely with a number of stakeholder groups (including Networks and Jurisdictional regulators) to produce codes of practice and technical guidelines that will improve the efficiency of the meter installation process by creating a consistent industry approach to work practices, testing and metering installation design. This work will be progressed through the balance of 2018 and into 2019 and is expected to improve outcomes for energy consumers.

Conclusion

The CMIG believes that increased flexibility when agreeing a date with a customer will produce a better service experience for energy consumers while allowing electrical workers to better manage their time traveling to and at customers sites to carry out metering works safely. Should you have any questions in relation to this submission please contact Doug Ross on 0417205395 or doug.ross@competitivemetering.com.au.

You Sincerely

For and on behalf of the Competitive Metering Industry Group



Doug Ross
Chairman