

25 October 2018

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Confidential information has been omitted for the purposes of section 24 of the Australian Energy Market Commission Establishment Act 2004 (SA) and sections 31 and 108 of the National Electricity Law, and sections 223 and 268 of the National Energy Retail Law

Dear Sir/Madam,

Draft Rule Determination

National Electricity Amendment (Metering Installation Timeframes) Rule 2018

National Energy Retail Amendment (Metering Installation Timeframes) Rule 2018

PLUS ES welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) draft rule change.

The rule change indicates a change in the connection timeframe obligations placed on Retailers, Metering Coordinators (MC) and Network Service Providers (DNSPs) for New Connections, Adds & Alts, Asset Replacements and Faults.

Timeframes for Customer-Initiated Meter Installations

PLUS ES understands that the timeframes proposed for new and upgrade connections will be 6 and 15 business days respectively unless the exemption criteria of Clauses 7.8.10A/B/C (b) are met. At the 'Meter Installation Timeframes Stakeholder Workshop' on 12th October 2018, the AEMC clarified that where there is no agreed date with the customer, then the installation can occur before the nominated date as long as it is within 6 or 15 business days as applicable. PLUS ES supports this clarification and agrees with the AEMC that it will be a good customer experience.

PLUS ES also requests that the AEMC considers updating clauses 7.8.10A (a)(1), 7.8.10B (a)(1) and 7.8.10C (a)(1) of the NERR to "on a date or date range agreed with the *small customer*". It is PLUS ES' experience, over the course of several years, that the majority of customers do not require a nominated date or require to be home for their installation. PLUS ES would support a 10 business day range for the installation

[Redacted text block]

[REDACTED]

[REDACTED]

[REDACTED] Enabling customers to agree to a 10 business day installation range will give greater flexibility for meter technicians to adjust their schedules to compensate for any unforeseen circumstances such as weather events, traffic delays or for jobs that take a shorter or longer than expected timeframe to complete (eg. presence of asbestos, access issues, etc.). The technician will accordingly be able to bring forward or push back installation jobs within the 10 business day window and still meet customer expectations. This will also alleviate any pressure on the meter technician to carry out metering works where it may be considered unsafe.

Meter Exchange - Reasons

To support the ability to monitor and meet the timeframes proposed for the new and upgrade connection requests, PLUS ES requests the use of a Service Order Reason for all Meter Exchange Service Orders (as per Disconnection Service Orders). This will allow the market to distinguish the different categories of Metering Service Works in the Meter Exchange space and apply the appropriate timeframes. PLUS ES proposes the reasons of:

- Fault- Meter Fault requires meter replacement;
- Customer- Customer initiated meter replacement;
- Family- Meter replacements due to family failure;
- Emergency – Emergency Meter Exchanges;
- Retailer – New meter deployment as initiated by Retailer.

DNSP Notification of Completion of Connection Work

The rule change to require the DNSP to notify Retailers as soon as the connection work is completed is a positive enhancement for the market. Whilst many jurisdictions already utilise AEMO's B2B e-hub and send a completion notice for a Supply Service Works Service Order, the requirement for all DNSPs to use this process will allow uniformity across the industry. Receipt of this notification from all jurisdictions via the B2B system, unless an ASP is undertaking the service in NSW, will support an improved customer experience with the status



of the key stages of the installation process being available to all parties.

Planned Interruption Notification and Customer Consent

PLUS ES supports the rule change proposed to the NERR Rule 59C where customer consent to a specified date overrides sub-rules (2), (3) and (4). We believe that this proposal will significantly assist in achieving installations in a timeframe that is satisfactory to the customer. Where customer consent is obtained, PLUS ES' view is that the requirement for a planned interruption notification to the retailer and the distributor should not apply.

Clause 59C Planned Interruption Notification will also need to be amended to allow a date range to be provided within the notification.

PLUS ES requests that the AEMC considers amending clause 59C so that the record of the customer agreement only needs to be retained for 2 years rather than 7 years.

Objection Period Reduction

The reduction of the Objection Period where an existing accumulation or manually read interval meter is being replaced with an advanced meter to zero is supported by PLUS ES as a positive step to smoothing the replacement meter process. PLUS ES would like confirmation that the existing objection rules will be retained and the objection period will (simply) be reduced to zero days. This will allow Participants to continue to object on the day of receipt (whilst CR is at REQ status) albeit CRs will go to PEND a day earlier than the current process.

PLUS ES notes that the change does not benefit prospective CRs where a CR1500 is required for completion.

Customer Consent to Appointment Date and the Retailer Interruption to Supply (Rule 59C)

PLUS ES welcomes the more flexible notification requirements for Retailer Planned Interruptions of electricity supply and expects this positive development will result in more efficient meter installations for customers.

PLUS ES support the rules changes proposed to the NERR Rule 59C where customer consent to a specified date overrides subrules (2), (3) and (4). We believe that this proposal will significantly assist in achieving installations in a timeframe satisfactory to the customer. PLUS ES notes the proposed obligation to continue to provide the *retailer planned interruption* notification to the customer and the Retailer's obligation to provide the notification to the distributor in this scenario even though timeframes may be significantly shorter. We understand

that a physically delivered notification may indeed arrive after the customer agreed appointment date due to lead times for mailing if that is the method chosen by the Participant.

Exception Types Preventing Installing on the Nominated Day

At the 'Meter Installation Timeframes Stakeholder Workshop' on 12th October 2018, the AEMC requested provision of exception types encountered by the Metering Providers that have proved barriers to installation on the nominated day. PLUS ES provide the following in response:

- No Access to metering installation
- Supply not connected on expected date
- Electrical & other safety constraints, including asbestos, requiring additional works, not able to be completed at appointment time
- Jurisdictional Service Rules obligations requiring additional work, not able to be completed at appointment time
- Customer refusal at time of metering installation
- Shared Fuse Isolation affecting third party customers.
- Customer requesting alternative date for metering installation
- Force Majeure.

PLUS ES would welcome any further discussion in relation to this submission. If you have any questions or wish for further discussion, please contact Linda Brackenbury on 02 4951 9921 or at Linda.Brackenbury@pluses.com.au.

Sincerely,



Darren Ferdinands

Head of Metering - PLUS ES