

24 October 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 Timeframes) draft determination.

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 is supportive of the AEMC's efforts to provide customers with greater control and certainty on meter installation timeframes.

TasNetworks supports the full range of measures introduced through the draft rule determination for both retailers and distributors. This includes supporting retailers in Tasmania to meet their meter installation timeframe obligations by coordinating the connection changes as required by the draft determination. TasNetworks considers that mandating maximum meter installation timeframes will provide greater confidence to customers regarding when works will be completed and help avoid unnecessary installation delays.

TasNetworks also considers that allowing customers to agree on dates for installation works that can take place within the retailer planned notification period, or outside the maximum installation time frame of 15 days, will give greater flexibility and control to customers. Similarly, the recommendation to AEMO that they streamline the appointment process for metering parties in certain circumstances should help to speed up overall installation timeframes.

In TasNetworks' earlier submission to the consultation paper, it was highlighted that there would be customer benefits to aligning the rules around the notification of retailer and distributor planned interruptions. That is, allowing distributor planned interruptions to occur within the notification

period with customer consent. Although large distributor planned interruptions, that involve de-energising many customers, makes obtaining customer consent impractical, there are many cases where smaller distributor planned interruptions are undertaken. For example, as noted in the ENA and AMEC teleconference, upgrading infrastructure or pole replacements where only a handful of customers are affected. In these cases, obtaining customer consent is eminently feasible and would result in more efficient scheduling and execution of interruptions, ultimately resulting in improved customer outcomes.

Further to this, and as also noted in TasNetworks' earlier submission, TasNetworks has proposed several amendments to Tasmanian regulations to provide different obligations for distributor planned interruptions. TasNetworks considers that these amendments, which are similar to those already in place in other jurisdictions, might also be reasonably included as part of any national planned outage notification harmonisation exercise. For example, improvements to the notification consent process from use of the new 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 suggested 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.

A second proposed amendment adopts drafting applied in South Australia that derogates from the requirement under rule 90 of the National Electricity Retail Rules (**NERR**) by exempting DNSPs from having to provide notice where the planned outage is expected to last no longer than 15 minutes. Reducing customer inconvenience, service interruptions and administrative burden should ultimately flow through to lower customer bills and improved customer outcomes.

TasNetworks would welcome the opportunity to discuss this submission further with you. Should you have any questions, please contact Bradley Woods, Senior Regulatory Analyst, via email (bradley.woods@tasnetworks.com.au) or by phone on (03) 6271 6187.

Yours sincerely,



Kirstan Wilding
Leader Regulation