Ausgrid Submission

Metering Coordinator Planned Interruptions Rule Change

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Attn: Mr Ed Chan
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Lodged online

Dear Mr Chan

Ausgrid is pleased to provide this submission to the AEMC's Introduction of Metering Coordinator Planned Interruptions rule change (ERC0275).

We welcome any recommendations that lead to improved customer outcomes in the provision of metering services. Importantly, the AEMC should ensure that appropriate safety and consumer protections are in place before any new metering arrangements are introduced.

Our submission provides views on a number of issues raised in the AEMC's consultation paper. Issues similar to these are also being considered by the NSW Government in its review of arrangements for digital metering.

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

Iftekhar Omar
Head of Regulation

1. Overview

A positive customer experience is key to the successful introduction of new metering products and services across NSW. Ausgrid supports any recommendations that improve the customer experience while ensuring that the safety of the customer, the public, and electrical workers is maintained.

The AEMC is considering a rule change request that seeks to introduce an ability for Metering Coordinators (MCs) to arrange planned interruptions for any electricity customer, regardless of the customer's retailer, for the purposes of installing, maintaining, repairing or replacing an electricity meter.

Consistent with the views of the Chair of the Competitive Industry Metering Group, we recognise that metering work associated with customer isolations where a common supply exits presents some difficult operational issues. This submission presents our views on some of these issues.

2. Planned outages requiring isolation of multiple customers

We recognise the difficultly in planning customer interruptions for metering work where the site electrical connections remain generally unknown to the MC.

Planned interruptions are often cancelled on site if the MC encounters a common electrical supply for multiple customers which was not foreseeable in the planning stages. Cancellations occur because the MC is only authorised to isolate a specific meter. This results in customer dissatisfaction and a costly process to arrange a distributor-led outage of all customers connected to the common supply.

The provision, within the Ausgrid franchise, of common fused supplies/ service protection devices for the supply of customer installations is an established practice and will continue in the long term. We note that changes to the NSW Service and Installation Rules made in 2017 provided for a meter isolation facility for new or upgraded meter installations.

If MCs are to manage planned interruptions, they will require access to relevant planning information and a higher level of authority to manage site conditions with a common electricity supply. For example, MCs could have access to NMI ‘discovery’ for outage planning purposes.

However, it is important that consumer protections and notification obligations under the National Electricity Customer Framework (NECF) are not eroded by new interruption arrangements, particularly for life support and vulnerable customers.

3. Planned isolation that includes DNSP-owned equipment

A planned outage involving the isolation of electrical equipment that is owned by the distributor but is within the customer’s installation must be authorised by the distributor as part of the outage planning process. Only distributor authorised persons may conduct outages involving distributor owned assets.

4. Switching of electrical equipment to achieve isolation

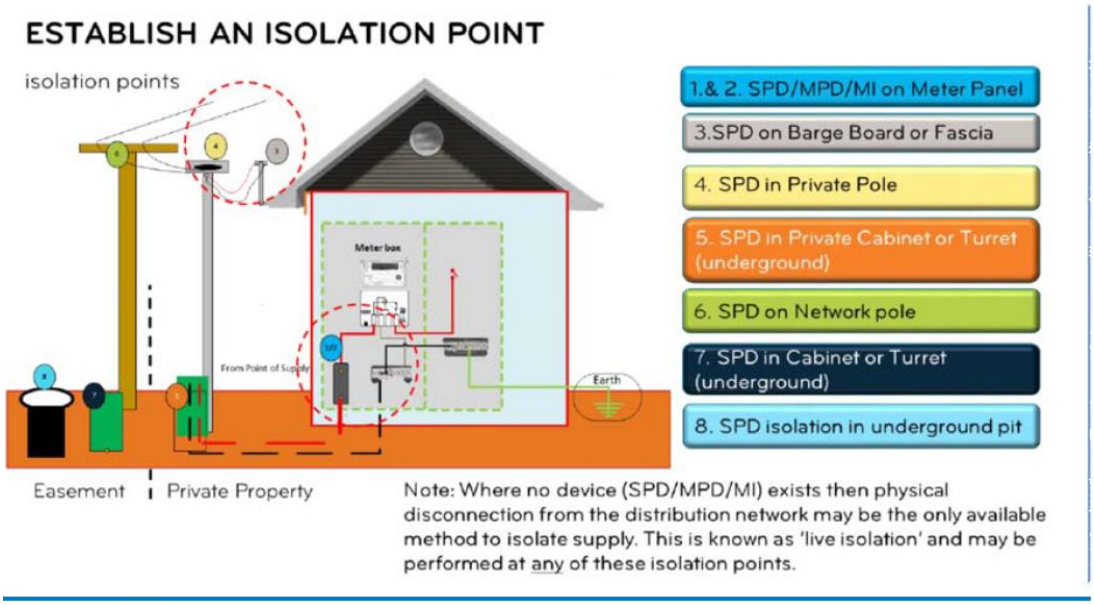
In our view, the physical operation of any electrical equipment associated with electrical work must be carried out by appropriately qualified and authorised personnel.

There can be various physical isolation points to enable safe work to replace or install meters. Such points may physically be a fuse, or an isolation device. Figure 1 shows where typical points of isolation may be found associated with an installation.

We consider there is potential scope to allow the operation of Service Protection Devices (SPDs) in situations 1-5 (on the customer premises) in Figure 1 subject to the work being carried out by appropriately trained and qualified personnel.

The work to carry out switching /isolation work for situations 6-8 in Diagram 1 carries a significant safety risk and must be only be undertaken in accordance with Network Operator requirements including the Electrical Safety Rules, training and authorisations. The ASP accreditation scheme in NSW would be considered adequate for this purpose.

Figure 1 The range of different isolation points



Data source: Vector.

5. Registration of metering coordinators with EWON

Electricity retailers and distributors are required to become members of the Energy and Water Ombudsman NSW. Customers can complain to EWON about supply issues, including planned outages.

In our view, MCs should be subject to the same obligations as retailers and distributors for planned outages. This includes being subject to civil penalties for breach of the relevant

provisions as well as membership of the NSW ombudsman scheme. This would provide customers with an alternative mechanism to resolve disputes about planned outages.

We also support the development of a system for the registration of Metering Coordinators as discussed in the AEMC Workshop (19 September 2019) to optimise and facilitate works between multiple retailers.

6. Notification of planned outage work

We consider that it is in the best interests of customer management that all planned MC outages be digitally notified to Ausgrid by the B2B systems with such notifications to be effective only for the planned outage dates.


Thank you
Ausgrid