

Alisa Toomey  
Project Leader – Metering Coordinator Planned Interruptions  
Australian Energy Market Commission  
Level 6 201 Elizabeth Street  
Sydney, NSW, 2000

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## **ERC0275 – Introduction of metering coordinator planned interruptions rule**

The Competitive Metering Industry Group (CMIG) welcomes the opportunity to make a submission to the Australian Energy Market Commission's (AEMC) Consultation Paper on the Introduction of Metering Coordinator Planned Interruptions.

The 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 wherever possible.
- Technical standards for metering installations.
- Safe work guidelines and practices.
- Coordinated industry representation on appropriate committees.
- Industry coordination of securing metering installations (Metering Keys and Sealing)

CMIG member organisations are members of 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 complying with jurisdictional regulatory regimes. MEA is an experienced and trusted adviser to governments and regulators on industry issues.

## **Response to Consultation Paper Questions**

### **QUESTION 1: PROPOSED NER AMENDMENT**

*1.1. What are the benefits of allowing metering coordinators to arrange and carry out planned supply interruptions?*

All electrical workers are required to interrupt supply such that they can carry out their work safely. Electricians typically identify the point of isolation, notify the affected consumers, carry out their work and then return the supply. In the case of metering, this cannot happen when customers of

other retailers are affected as a result of the interruption meaning the works cannot be completed. The primary benefit of this rule change is increased efficiency by creating a mechanism where the electrician doing the metering installation can complete the installation on the first visit if consent can be obtained from the affected customers. It is expected that this will allow more metering installations to be completed on the first visit that would otherwise have needed to be revisited. The coordination activities required under the current rules where either the customers retailer or distributor need to initiate all outage create overheads on the cost of metering installation services that provide little benefit to consumers. By allowing the metering coordinators to initiate planned interruptions under the same arrangements currently available to retailers and distributors, energy consumers will receive a more timely and efficient service regardless of who initiates the interruption with metering coordinator interruption able to happen quicker because the requirement to coordinate the interruption with retailers and distributors is removed.

*1.2. What is the magnitude of the issue that the rule change request is attempting to resolve? For example, how many meter installations are delayed due to inability to interrupt the supply of the retailer's customer without interrupting the supply of one or more other customers?*

Data provided by CMIG members indicate that on average around 5% of all meter installations are delayed by shared fusing with about 50% of that 5% relating to customer-initiated meter replacements. Based on current meter installation volumes, this equates to about 10,000 metering installations per year delayed because of shared fusing or 50 per day.

*1.3 Under what circumstances would the rule be used? Do stakeholders consider that there would be any issues if the proposed rule is made with how the rule would interact with retailers, DNSPs and metering parties existing obligations in the NER or NERR?*

It is expected that the vast majority (about 80% of all installations delayed by shared fusing) of cases where metering coordinators would elect to initiate a planned interruption is at smaller sites where only 1 or 2 other customers would be affected. The complexity associated with managing customer notifications at larger more complex sites (about 20% of all installations delayed by shared fusing) mean that meter coordinators are likely to continue to utilise distributor planned interruptions for complex sites. In a small percentage of cases, the metering coordinator may be able to manage notifications in large complex sites with the assistance of the building managers and the rules should not prevent this happening. A short supply interruption affecting multiple customer is notionally no more complex than managing lift of fire system maintenance which are common activities for many building managers

*1.4 Would additional or alternative amendments to the NER be required to address the underlying issues in the rule change request?*

As part of developing this rule change, CMIG ran workshops with AEC member retailers and ENA member distributors to consider alternative arrangements. The workshops resulted in a consensus view that the introduction of metering coordinator planned interruptions would provide the best experience for energy consumers while facilitating an efficient and low-cost outcome.

*1.5 Are there alternative solutions to introducing metering coordinator planned interruptions which would address the underlying issue of delays in installing or replacing meters in circumstances where there are*

*shared fusing issues?*

See response above to question 1.4.

*1.6 Should any restrictions be placed on the number of customers whose supply can be interrupted under a metering coordinator planned interruption?*

No restrictions should be placed on the number of customers whose supply can be interrupted. The framework of civil penalties that is proposed to be imposed by the rule change on metering coordinators will provide sufficient incentive to ensure metering coordinators only carry out planned interruptions on a number of customers on which they can manage their obligations under the rules.

## **QUESTION 2: REQUIREMENTS FOR METERING COORDINATOR PLANNED SUPPLY INTERRUPTIONS**

*2.1 Are retailer planned interruptions required if metering coordinator planned interruptions are introduced? Why or why not?*

Retailer planned interruptions are still required. Share fusing effects only about 5% of all meter installations with the vast majority (more the 85%) of all metering installations completed effectively and efficiently using retailer planned interruptions. There is no requirement to change this arrangement. This rule change seeks to lift successful installs above 90% by adding the option of metering coordinator planned interruptions to the existing arrangements in the rules. CMIG are open to accepting the removal of retailer planned interruptions if it can be shown that this will not result in a reduction to the number of successful first-time meter installs.

*2.2 Are additional or alternative amendments to the NERR required or appropriate to address the issues?*

No additional or alternative amendments beyond what is proposed in the rule change to the NERR is required.

*2.3 Are the methods of communicating planned outages, and the information provided in the planned outage communications with other market participants adequate? Are there any further amendments which should be considered?*

The use of the existing B2B framework is considered adequate for communicating planned outages.

## **QUESTION 3: OTHER ISSUES**

*3.1 Do metering coordinators require a specific level of access in MSATS in order to identify the customer who would receive a supply interruption? Is there an alternative method which would be more appropriate to obtain the required information? Are there any issues with providing metering coordinators with access to NMI Discovery?*

Metering Coordinators currently have access to NMI discovery in MSATS for the purpose of identifying if a NMI is “small” or “large”. This access could be extended to allow its use for planned interruptions.

NMI discovery is considered to be an appropriate method of obtaining the information required to affect a planned interruption and no alternative are required.

Metering Coordinators are market participants exposed to the penalties under the rules if NMI discovery is misused – there are no issues with Metering Coordinators access to NMI discovery.

*3.2 What is the most appropriate arrangements for a metering coordinator to determine whether a resident at any of the premises it intends to arrange a planned supply interruption uses life support equipment?*

Once the NMI has been identified as needing to be interrupted, a metering coordinator can send that NMI's retailer or distributor a customer data request (CDR) to confirm the customers details and status. In most cases, interruptions as a result of shared fusing are notified via a written notice being delivered to the affected customer on site. Compliance with the obligations under the rules can be met by corresponding with affected customer locally and any information shared between participants via market systems essentially strengthen what is already a compliant solution.

*3.3. Should customers have any access to dispute resolution or another form of recourse if a metering coordinator breaches any of the rules in relation to metering coordinator planned interruptions?*

No additional dispute resolution should be required. Customers have access to dispute resolution via their energy retailers. Energy retailers' contract with metering coordinators for services providing a framework for disputes to be resolved.

*3.4 Are there any other issues that the Commission should consider in relation to the proposed rule change?*

No

## Conclusion

The CMIG believes that the increased flexibility the proposed rule change facilitates will produce a better service experience for energy consumers on shared fuses while allowing electrical workers to better manage their time and 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](mailto:doug.ross@competitivemetering.com.au).

You Sincerely

For and on behalf of the Competitive Metering Industry Group



**Doug Ross**  
Chairman