

9 October 2019

Mr John Pierce
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Ms Allison Warburton
Mr Charles Popple
Ms Michelle Shepherd
Australian Energy Market Commission
PO Box A2449
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Submitted electronically

Dear Commissioners

ERC0275 – Metering Coordinator Planned Interruptions

EnergyAustralia is one of Australia's largest energy companies with over 2.6 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. We also own and operate a multi-billion dollar energy generation portfolio across Australia, including coal, gas, and wind assets with control of over 4,500MW of generation in the National Electricity Market (NEM).

EnergyAustralia welcomes the opportunity to make this submission to the Australian Energy Market Commission's (AEMC) consultation paper Metering Coordinator (MC) Planned Interruptions. We strongly believe that allowing MCs to carry out planned supply interruptions will greatly reduce the delays that customers are experiencing in single-isolation point connections. This will improve the customer experience and drastically reduce resourcing and timeframes impacted by these scenarios.

The AEMC rule change focuses on improving one specific scenario that impacts the installation of customers' meters; single isolation device limiting the ability of an MC to interrupt the supply of only the customer that required the meter exchange. The rule changes will enable the supply interruption to occur on the same day – with recorded consent from the neighbour – or an MC can provide Planned Interruption Notification (PIN) to impacted properties to schedule an interruption for a future date, min 4 bus days in the future.

The MC planned interruption reduces/removes the requirement for a distributor initiated planned interruption, and its associated ~\$500.00 temporary interruption group supply charge.

The rule should not limit the size or number of customers that an MC can conduct a planned interruption for, as allowing an MC to complete these sites where possible is productive for competition; however, it is understandable that large single isolation point sites will likely be handled by distributors, as realistically it will be difficult to coordinate the planned interruption in these situations.



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EnergyAustralia has some concerns with the proposed rule change, in particular how retailers are notified of the interruptions, and how the correlating notification is provided to their customers.

Retailers have concerns with their branding used on an MC PIN as it will confuse customer and will imply that the retailer is liable, and if there is no retailer branding it is unlikely customers will be aware of whom is conducting the work. EnergyAustralia believes the MC PIN is the preferable option, and that retailers will need to ensure that appropriate education is provided to customers to ensure any concerns are addressed. Our preference is that the retailer PIN is no longer required in any instance and is entirely replaced with the MC PIN.

MCs should have obligations to advise retailers and distributors of the planned MC interruption, to facilitate this MC's will need to be able to access customer details via the Customer Detail Request, this will confirm important details such as if there are any life support requirements. The current provisions in the AEMO procedures for use of NMI discovery will need to be expanded, allowing MCs to determine who the FRMP is for other impacted customers.

We believe that the MC should only have access to NMI discovery when it is able to demonstrate the discovery is for the purpose of an MC planned interruption. This is predominantly due to the possibility that it might be used for commercial gain, and the increased privacy concerns with MCs being provided additional details of customers. We understand that this is not something currently identifiable in MSATS (as MCs will be able to obtain details of sites they will have no relationship with), as such we request the AEMC consider how the commercial and privacy risks can be addressed.

EnergyAustralia supports the proposed rule change, and with minor improvements to the PIN process, considers there will be material consumer benefit which will outweigh any costs.

If you would like to discuss this submission, please contact me on 03 8628 1704 or Travis.Worsteling@energyaustralia.com.au.

Regards

Sarah Ogilvie

Industry Regulation Leader