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Australian Energy Market Commission  
Attention: Ms Alisa Toomey  
PO Box A2449  
Sydney South NSW 1235

Reference: ERC0275

Dear Ms Toomey

### **Introduction of Metering Coordinator Planned Interruptions**

Meridian Energy Australia Pty Ltd and Powershop Australia Pty Ltd (MEA Group or Powershop) thanks the Australian Energy Market Commission (AEMC) for the opportunity to provide comments on the Introduction of Metering Coordinator Planned Interruptions Consultation Paper (the Paper).

#### Background on the MEA Group

MEA Group is a vertically integrated generator and retailer focused entirely on renewable generation. We opened our portfolio of generation assets with the Mt Millar Wind Farm in South Australia, followed by the Mt Mercer Wind Farm in Victoria. In early 2018 we acquired the Hume, Burrinjuck and Keepit hydroelectric power stations, further expanding our modes of generation. We have supplemented our asset portfolio by entering into a number of power purchase agreements with other renewable generators, and through this investment in new generation we have continued to support Australia's transition to renewable energy.

Powershop is an innovative retailer committed to providing lower prices for customers and which recognises the benefits to customers in transitioning to a more distributed and renewable-based energy system. Over the last five years, Powershop has introduced a number of significant, innovative and customer-centric initiatives into the market, including the first mobile app that allows customers to monitor their usage, a peer-to-peer solar trading trial and a successful customer-led demand response program. Powershop has also been active in supporting community energy initiatives, including providing operational and market services for the community-owned Hepburn Wind Farm, supporting the Warburton hydro project, and funding a large range of community and social enterprise energy projects through our Your Community Energy program.

MEA Group offers its customers innovative tools that enables them to monitor their usage. For these tools to be of most benefit to customers, smart meter data is required, hence MEA Group supports the installation of smart meters for customers with a basic meter.

The current prohibitive rules and legislation are a significant impediment to the deployment of smart meters to customers. Sub-rule 59C of the National Energy Retail Rules (NERR) allows MEA Group to initiate an interruption of supply only for our own customers. This limitation has led to our Metering Coordinators (MCs) terminating meter installations due to multi-occupancy isolation issues.

Legislation provides for distribution networks to install a smart meter for multi-occupancy sites due to exemptions granted to them under workplace health and safety legislation. This exemption does not exist for MCs and their technicians.

Please find below our responses to the questions raised in the Paper.

#### QUESTION 1: PROPOSED NER AMENDMENT

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

The primary benefits of allowing MC's to arrange and carry out planned supply interruptions are that:

1. when retailers allocate work to a MC, it would be logical for the MC to have the ability to interrupt supply should they need to and send the Planned Interruption Notices (PIN's); and
2. customers who have requested a smart meter can have their smart meter installed on the date that they requested.

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

The magnitude of this issue is significant from both a customer experience and cost-to-serve perspective. Approximately 50 – 60% of meter installation jobs we raise each month are not completed due to isolation issues/shared fusing.

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?

MEA Group and our MCs would use this rule for customers who require a meter exchange and have shared fusing with a neighbouring property. Anecdotal feedback suggests that several of the shared fusing sites relate to smaller groups of properties (1-4 customers), consequently this rule would enable MC's to interrupt the supply of up to 4 customers. MEA Group's view is that larger more complex sites should still utilise distributor planned interruption processes. However this should not limit a MC's ability to be involved in the planned interruption and PIN processes if it led to more efficient meter installation.

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

MEA Group is not aware of any additional NER amendment requirements.

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?

In the case of a family meter failure (MFM) or a meter fault, the current process is:

- the retailer will receive a MFM/ meter fault notification from the distributor;
- the retailer allocates the site to a MC;
- a MC attends site only to find a shared fuse and as a result cannot install the meter;
- that MC issues the retailer an 'unable to complete installation' transaction notice (which retailers are charged for); and
- the process starts again with input from the distribution network.

To remove inefficiencies in the above process, distribution networks could include in their FMF / meter fault notification that the site in question will require isolation due to a shared fuse. Information on the number of sites connected to the shared fusing would be beneficial for customers and industry.

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

Larger more complex sites should still utilise distributor planned interruption processes, in conjunction with the MCs (as noted at 1.3).

## 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?

In the case of a MC planned interruption as a result of an isolation issue identified onsite, a retailer planned interruption will not be required. In the case of a normal meter installation, it will depend on the agreement between the retailer and MC. Some retailers may require their MCs to issue PINs on behalf of the retailer.

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

MEA Group is not aware of any additional NERR amendment requirements.

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?

MEA Group view the existing communication methods as adequate.

## 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?

MCs currently have access to National Metering Identifier (NMI) discovery which holds site information, but it does not hold customer information. MEA Group would support providing MCs with greater access to NMI discovery in order to help them comply with relevant obligations under the NER.

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?

Life support information can be obtained from the retailer and shared with the MC. MCs can also determine life support requirements during consultation with the customer.

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?

MEA Group supports customers having greater access to dispute resolution however implementation would be complicated. We suggest the AEMC approach this question outside of this draft decision in consultation with industry and the respective ombudsman schemes.

If you have any queries or would like to discuss any aspect of this submission please do not hesitate to contact me.

Yours sincerely,



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