



8 October 2019

Alisa Toomey
Project Leader – Metering Coordinator Planned Interruptions
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

Lodged online: www.aemc.gov.au

Dear Ms Toomey,

RE: Introduction of Metering Coordinator planned interruptions rule change

Origin Energy appreciates the opportunity to provide a submission in response to the Australian Energy Market Commission (AEMC) consultation paper *Introduction of Metering Coordinator planned interruptions rule change*.

Origin conceptually supports allowing the attending Metering Coordinator to be able to undertake interruptions to other sites, however the practical application of this is complex and raises several issues that require consideration.

In its consultation paper, the AEMC has raised a series of questions for stakeholder comment. Origin's views on these issues are set out below.

Question 1: Proposed NER amendments.

Currently, under the NER, customers who are changing from an accumulation meter are not able to access the benefits of advanced meters until the new metering installation has been completed. Origin considers that the proposed rule change will not resolve all issues relating to supply interruptions for sites requiring an interruption to multiple customers, but the proposed amendments will provide an improved service in certain circumstances.

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

Metering coordinators arranging and carrying out planned interruptions would result in a more efficient process to allow for meter exchanges and other required works, in shorter timeframes for customers. After initially attending the site and determining that the work cannot be completed without also taking other customers off supply, the Metering Provider (MP) would be able to identify which additional addresses would require interruption and develop a plan with the relevant Metering Coordinator (MC) to notify these parties of a future planned interruption.

The MP and MC will not always be the same party. In such cases the MC would send notices to enable the supply interruption for the works to be completed by the MP. The notification must also include the affected

NMI. As these customers may not be customers of the retailer who requested the initial works, the MC must obtain the correct contact information from the distributor, as this is the only party who has all customer information, including life support requirements, as supplied by retailers through Customer Data Notification (CDN) transactions. We have further detailed why we believe the information is most appropriately provided by the distributor in response to question 3.2.

It should be noted that the MP and MC will be working with addresses obtained via physical visit to sites. The MSATS database does not use the same address structure as Australia Post. This may lead to discrepancies in address as it applies to discovery of the relevant NMI.

1.2 What is the magnitude of the issue that the rule change request attempts to resolve?

It is difficult to assess the magnitude of the problem, because the driver of the exception is relevant to whether the issue would be resolved through this proposal. Many sites are unable to be isolated because it requires other sites to be isolated at the same time. These would be addressed by this rule change.

However, in NSW MP's are unable to operate isolation devices due to a jurisdictional derogation. This is the driver of most works being unable to complete in NSW. While Origin supports the rule change proposal, in isolation this will only be an incremental improvement and is unlikely to fully resolve the issue.

1.3 Under what circumstances would the rule be used? Would there be issues with how this rule would interact with retailers, DB and metering parties existing obligations under the NER or NERR?

Origin considers that the rule would be used in cases where the MC is not prohibited from operating isolation devices, and in instances where there are a small number of affected sites that it would be reasonably practical to take off supply in order to perform works.

In order to meet the current market obligations there will be considerable distributor involvement in providing information to allow the MC and MP to be sure that notices are issued correctly for the right properties. The reason for this is detailed further in response to question 2.1.

We are also concerned about the management and notification of customers who have life support requirements, as retailers face significant penalties for contravention of notice periods. Origin expects that the relevant obligation and associated liability would rest with the party actively requesting the works. It is not clear from the proposal how life support customers would be managed, where liability for non-compliance, or requirement to report on breaches of these obligations would lie.

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

Origin has not identified further amendments to the NER that would be required to address the underlying issues raised in the rule change request.

1.5 Are there alternative solutions to introducing meter coordinator planned interruptions which would address the underlying issue of delays in installing or replacing meters where there are shared fusing issues?

The 2018 IPART review identified a range of improvements that can be undertaken to provide the meter providers greater ability to complete the work in a cost-effective manner through operating isolation devices. The inability of meter providers to undertake this work in NSW undermines the efficiencies available through the competitive metering reforms and will need to be addressed.

Allowing both MPs to perform isolations and MCs to schedule outages would reduce both risk to customer safety, wait times, and customer incurred costs.

Question 2: Requirements for metering coordinator planned interruptions.

It is proposed that the planned interruption notification is required either on the same day the customer provides consent to the metering coordinator for the planned interruption, or, if the metering coordinator and customer have not come to an agreement on a date, at least four business days prior to the planned interruption of supply. Origin supports this proposal, particularly as these timings are consistent with retailer requirements.

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

Origin considers that retailer planned interruptions are still required, even if metering coordinator planned interruptions are introduced. The customer engages with the retailer, and the retailer would be required to assist with customer enquiries, undertaking follow up with the customer and managing customer experience relating to defects.

Further, the structure of the rule change implies that all MCs will have a relationship with all retailers, in order to obtain customer details to issue the planned interruption notices. This is not the case. However, the MC will have a relationship with the distribution businesses and can readily request customer details this way. For this reason, Origin has noted that there would need to be considerable distributor involvement in our response to question 1.3.

The MC would also need to notify the third-party retailer that there is a planned interruption for a site that it is not nominated against, which raises additional complexities. In instances where the MC is not able to issue the notice to a retailers' customer either because the information is not available from the distribution network or for contractual reasons, the MC could still request that the retailer provide the relevant notices to the customer directly, in order to go ahead with the planned interruption. We consider that the retailer planned interruptions provisions should be retained to ensure such scenarios can be accounted for.

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

Origin has not identified alternative amendments to the NERR that would be required to address the issues raised in the consultation paper.

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?

Origin considers that the method of communicating planned outages to customers is adequate considering the information required to be provided. However, Origin notes that the AEMC is also consulting on the rule change *Reducing customer switching times*, the outcome of which may have a material impact to the information visible in the B2B transactions that all parties rely on in order to provide services to customers which relate to planned interruptions.

The prospect of non-nominated parties notifying customers of planned interruptions also raises questions about how retailers are provided with information in order to assist customers where they contact the retailer about the outage. While the MC or MP may include the contact details of the customers current retailer, that retailer does not appear to have any market-based visibility of the interruption occurring and would not be able to meaningfully assist the customer (outlined in greater detail in response to question 3.2).

Question 3: Other issues.

The metering coordinator currently has limited access to data via NMI discovery. The information available through this tool at present allows them to see whether a site is *small* or *large*, but not information relevant to issuing planned interruption notices.

The method under which the metering coordinator would obtain the NMI impacts role nominations, other market participants, and raises potential privacy concerns that should be considered. In addition, the mechanism for the appropriate identification and management of life support customers is not detailed,

although it appears that there are some assumptions built into the rule proposal. We have outlined our concerns in response to the AEMCs questions, below.

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?

As noted earlier, the MP and MC will be working with addresses obtained via physical visit to sites, which may also lead to discrepancies in address as it applies to the relevant NMI. This means there is a residual risk that the incorrect address or NMI is selected while using the discovery tool.

Providing MC's with NMI discovery would assist in their requesting information relevant to the supply interruption notification but would not provide information that would indicate a supply interruption was required pre-emptively. MSATS does not contain this information, and the distribution businesses often do not have this information (for example sites where there is shared fusing) and can only find it out by attending the site.

3.2 What is the most appropriate arrangement 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?

The rule proposal does not detail in what circumstances a check would be undertaken to ascertain whether there is a life support requirement at the premises. Origin considers that if the site is not one for which the MC or MP is nominated for, the assumption should be that there is a life support requirement and a check undertaken to confirm whether this is the case. At present this is not necessary as all information about a site that the nominated party is working on is provided by the contracting retailer. The rule proposal creates a situation in which there are multiple retailers who are not contracting the MC or MP directly, and the nominated party for the additional sites may not be the MC or MP who is undertaking the works. This creates uncertainty in the role nominations which are relied on for the provision of information.

Currently anyone can raise a Customer Details Request (CDR), however at present there is no need for an MC or MP to raise one where they are not the nominated party. In cases where they are not the nominated party, the retailer is unlikely to provide the CDR response as it contains much more information than is required for the works to be completed, and provision of this information to a third party (that the retailer may not have a relationship with) may be a breach of privacy.

We feel it is more appropriate for the distribution business to provide the response to the MC or MP because:

1. the MC or MP is nominated to at least one of the sites the information is being requested for, and
2. the distributor has visibility of the purpose for the request.

The distribution business could provide the relevant information in response to the request, although a transaction or response type that currently does not exist may need to be developed in order to achieve this.

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?

Origin considers that customers have access to dispute resolution via their energy retailers. There is no requirement that the MC or MP be a direct member of the Ombudsmen schemes. A retailers' contract with its providers is the mechanism through which they manage that providers performance. Where a complaint is raised by a third-party retail customer, this complaint would need to be managed by the retailer for whom the original request was carried out.

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

Origin has raised several other issues that are related to this proposed rule change throughout this submission:

- Address structure discrepancy between Australia Post and MSATS
- The derogation in NSW which prevents metering coordinators or metering providers from operating isolation devices
- Lack of visibility of shared fuse arrangements
- Operational hurdles linked to privacy requirements
- Potential impacts arising from concurrent rule change consultations

We consider that these issues will add to the complexity of making this rule change operational. While they are not insurmountable, they should be considered when assessing the likely efficacy of the rule change proposal.

Closing

Allowing the attending Metering Coordinator to undertake interruptions to other sites will provide customers with improved outcomes and assist in the resolution of some of the barriers to metering installations. However, the operationalisation of this proposed change is complex and raises broader issues that must be considered to ensure that the best customer outcomes are obtained.

If you have any questions regarding this submission, please contact Courtney Markham in the first instance on 03 9821 8086 and or Courtney.Markham@originenergy.com.au.

Yours sincerely



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