



D19105159

16 October 2019

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235


Dear Mr Pierce,

RE: ERC0275 – NATIONAL ELECTRICITY AMENDMENT (INTRODUCTION OF METERING COORDINATOR PLANNED INTERRUPTIONS) RULE, NATIONAL ENERGY RETAIL AMENDMENT (INTRODUCTION OF METERING COORDINATOR PLANNED INTERRUPTIONS) RULE

The Energy and Technical Regulation Division ('Division') of the Department for Energy and Mining thank you for the opportunity to make a submission on the *National Electricity Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule, National Energy Retail Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule* Consultation Paper issued by the Australian Energy Market Commission (AEMC) on 29 August 2019 (ERC0275).

The Division supports the principle that small customers should receive timely metering services, regardless of the premises they live in.

The Energy and Water Ombudsman SA (EWOSA) has advised the Division that ten multi-occupancy ('multi-oc') complaints have been submitted to EWOSA due to delays in metering-related services since February 2019.

In addition, South Australia's Office of the Technical Regulator (OTR) has also advised the Division that it has received complaints on this issue.

Through our assessment of the rule change proposal, the Division considers that the underlying principle, which is to introduce an ability for metering coordinators (MCs) to arrange planned interruptions for any electricity customer, regardless of the customer's retailer, when undertaking metering-related work, to be reasonable. It also seeks to ensure that multi-oc customers receive metering-related services within a reasonable timeframe.

The Division therefore supports the intent of this rule change proposal.

Whilst noting this is the initial phase of consultation on the proposed Rule change, the Division is of the view that a number of issues need to be considered in further detail as part of the process.

Firstly, it is the view of the Division that the AEMC should consider the process if an unexpected issue occurs and work must be abandoned by the MC part-way through the metering-related work. This may leave customers off supply and/or in a worse position than they were originally. One example may be where the MC requires the

Distribution Network Service Provider (DNSP) to attend the site in order to complete the job. This issue could potentially be further exacerbated where there are vulnerable customers in the multi-oc premise (e.g. with life support equipment) and the MC (and the retailer) does not have a contractual arrangement with other affected customers in the building.

More broadly, the Division requests that the AEMC give particular consideration to customers with life support equipment. For example, how to ensure customers that are registered as having life support equipment are identified by the MC, in the absence of such information being available to the retailer (given it may not be the Financially Responsible Market Participant (FRMP)) by whom the MC has been appointed.

In addition, as identified by the AEMC in its paper, the Division is also unclear as to the relationship between a retailer planned interruption and the proposed MC planned interruption. The Division also queries whether the intention of the new initiator class is to render the retailer process obsolete, as queried by the AEMC in its Consultation Paper.

Finally, the Division supports in principle MCs being required to become members of jurisdictional energy ombudsman schemes for the purpose of independent dispute resolution. In South Australia, the MC is the 'prescribed person' under the *Electricity Act 1996* for metering-related work. Therefore, requiring an MC to become a member of a jurisdictional energy ombudsman scheme would ensure that the Participant(s) responsible for the metering-related work are held accountable if issues occur, and customers can be financially compensated for issues as they arise. In the absence of this arrangement, customers should have the comfort of knowing a relatively easy and timely form of dispute resolution is available.

On a related matter, the Division understands the AEMC will be releasing an approach paper later this year as part of the AEMC's requirement to review the state of competition in the metering services' market three years after the commencement of Chapter 7 of the National Electricity Rules (NER).

We look forward to participating in the AEMC's wider review at the appropriate time.

Thank you again for accepting our submission. Should you wish to discuss this further, please contact Ms Rebecca Knights, Director, Energy and Technical Regulation Division, on (08) 8429 3185.

Yours sincerely,



Vince Duffy

Executive Director, Energy and Technical Regulation

11 October 2019