

AEMC Ref: ERC0275

31 October 2019

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

Dear Alisa

Metering coordinator planned interruptions

I refer to the Australian Energy Market Commission's (AEMC), Introduction of metering coordinator planned interruptions, Consultation paper, 29 August 2019 and provide the following submission.

Metering Coordinator planned interruptions

SA Power Networks does not support the proposed rule change in its current form, that allows Metering Coordinators (MCs) to complete planned interruptions like those currently performed by distributors. We are concerned with that the proposed rule will have several unintended consequences that would reduce the benefits of the rule change and ultimately shift costs and inefficiencies to other parts of the industry.

The issues linked to this concern are:

- No formal contractual relationship between MCs and customer(s) – this rule change does not contemplate or propose a solution to the major gap between the MC and customer(s). Distributors and Retailers have a formal contract (deemed or negotiated) with customers which provide the basis for a large range of obligations. They define and support several key items like liability obligations (eg where does a customer go if they want to claim loss or damages resulting from the work completed by the MC), particularly customers that are not directly linked to Retailer and MC completing the metering work;
- Customer notification – a customer being advised by an organisation, whom the customer has no knowledge of or is aware of, via a notice of a planned outage. This notice is likely to be ignored or overlooked and result in customers being uninformed when the planned outage occurs. Customers first contact point when they experience an outage is their distributor and as such distributors are likely to see an increase in customer interaction;
- Cost Recovery – the rule change should incorporate provisions to permit distributors to recover its costs from MCs where there is a site visit to investigate customer outages or restore a customer supply that result from the metering work;
- Minimal customers impacted – SA Power Networks' analysis of the number of meter installs where a single connection point supplies multiple customers is less than 5% of meter installs. This includes connection points where it would be unsafe for MC's personnel to perform the disconnection and reconnection; and

- Distributor planned interruption – SA Power Networks can rectify any issues with the failure of our equipment at the connection/isolation point to restore a customer’s supply which otherwise would require the MC’s to contact us to remedy. This would increase the time customers are without supply.

It appears from the rule change request and the presentation material that the Proponent’s aim is to be able to disconnect customers and install the meter during the first site visit. If MCs were permitted interrupt supply in situations where the adjacent neighbours have explicitly agreed to the interruption to enable the meter change, then this would reduce the frustration currently being experienced by the MC’s customers. This scenario appears to provide the greatest efficiency improvement. In addition, we consider that it minimises the impact of some of the issues raised above.

SA Power Networks proposes that an MC be given the authority to interrupt other customers’ supply to replace/install a meter, provided the MC has sought and obtained whilst on site, the explicit informed consent of all customers affected by the planned interruption. In addition, the MC personnel should check prior to leaving site that the supply to all customers has been restored.

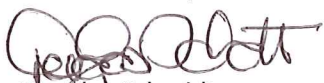
Other issues

SA Power Networks has required the installation of meter isolators for new and upgraded connections for many years. The installation of a meter isolator means that MC personnel can use that isolator to only isolate supply to a single customer, to replace/install a meter. The installation of a meter isolator is typically the least cost option for resolving existing sites where a single connection point supplies multiple customers. This work is beyond the connection point and can’t therefore be performed by the distributor. In addition, the cost of installing the meter isolator should be borne by the customer receiving the benefit and not subsidised by other customers.

The AEMC has indicated that it may be possible to remove the current timeframe exemptions for installing meters if the rule change as proposed is adopted. The adoption of the rule change would not remove the requirement for exemptions, as distributors would still be required to undertake isolations for complex sites where there is more than one connection point for the site.

If you have any questions or queries about our submission, please contact Mr Grant Cox Grant.Cox@sapowernetworks.com.au or telephone 08 8404 5012.

Yours sincerely



Douglas Schmidt
General Manager Regulation

