

10 October 2019

Mr John Pierce
Chairman
Australian Energy Market Commission
Level 6, 201 Elizabeth Street,
Sydney NSW 2000.

Submitted online: www.aemc.gov.au/contact-us/lodge-submission
Your reference - ERC0275

Dear Mr. Pierce

AEMC Rule Change Consultation: Introduction of Metering Coordinator Planned Interruptions

Thank you for the opportunity to provide a submission in response to the Australian Energy Market Commission's (AEMC) Rule Change Consultation covering the National Electricity Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule and the National Energy Retail Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule.

Momentum Energy is a 100% Australian-owned and operated energy retailer. We pride ourselves on competitive pricing, innovation and outstanding customer service. We retail electricity in Victoria, New South Wales, South Australia, Queensland and the ACT. We offer competitive rates to both residential and business customers along with a range of innovative energy products and services. We also retail natural gas to Victorian customers.

Momentum Energy is owned by Hydro Tasmania, Australia's largest producer of renewable energy.

Overview of Rule Change

This rule change submitted by the Competitive Metering Industry Group (CMIG) is based on their recent experiences with installing meters, particularly in NSW, where competition in metering has been introduced for small customers. Many meter installations in NSW are multi-site and also many of these do not have independent power isolators for each site. Moreover, many of the power isolators are located in the distribution network's assets making it difficult for Metering Coordinators to access without the networks' involvement.

Therefore we generally support the rule change but believe additional rules should be made to ensure more specific obligations are placed onto the distribution networks to:

- co-ordinate power interruption notices to affected customers; and
- obtain the customer's explicit informed consent where necessary;

for multi-site meter change installations with and without independent isolators. As the variability and complexity of these installations is inconsistent and not evident until the MC has visited the site it may be necessary for this involvement to be at the MC's discretion.

While we acknowledge that distributors no longer have responsibilities for new meters and meter replacements, in NECF jurisdictions, the property connection assets in some jurisdictions of many multi sites, necessitates their involvement as multiple retailers and customers are also likely to be involved.

The distribution networks must be obliged to undertake this activity in reasonable timelines that will deliver current day customer service expectations.

Specific Responses to Questions Raised by the AEMC

Question 1: Proposed NER Amendment

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

Allowing the MC to arrange and carry out planned interruptions will significantly improve the customer experience for most multi- site meter installations where each premise does not have a separate isolator. It will allow the MC to obtain suitable consent from the affected customers if they are present and proceed with the meter installation on the initial site visit. This will avoid delays in meter changes and deliver the service expected by most customers. Meter changes for sites located as a part of extensive multi sites (greater than say 10) may still require network involvement to coordinate and or facilitate the power isolation of an individual site, due to shared isolating equipment or network owned isolating equipment at these sites.

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?

As Momentum is only a relative small retailer in NSW our experience with this issue is not reflective of the impact across this jurisdiction. At the recent AEMC workshop the CMIG suggested that up to 50 meters per day in NSW were delayed due to this issue. However Momentum's MCs and customers have certainly commented on the delays and frustrations that have resulted from this issue.

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?

Momentum agrees with the CMIG assessment that the new rule would complement the existing rules and support improved customer outcomes for sites with shared isolators. MCs will need to ensure that life support and explicit informed consent (EIC) are adequately

managed before they isolate any impacted sites. It is not clear that they have ready access to life support data when they seek EIC onsite.

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

This rule change will resolve many of the multi-site issues but as mentioned above additional rules may be required to reinforce the need for prompt network involvement for the remaining extensive complex multi sites that have network owned shared isolating assets or greater than 10 sites controlled on a single isolator.

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?

This issue is mostly identified by the MC at the initial site visit and consequently there does not appear to be any alternative solutions.

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

Based on feedback from MCs there is not a common factor between the number of multi-site customers and those with shared isolators other than to say that the majority have less than 9 meters. MCs are under the same strict compliance obligations as retailers so we see no need to place any restrictions on MC planned interruptions, as any restriction may have the unintended consequence of delivering a poor customer experience, where this could have been avoided.

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?

There is no need to remove retailer planned interruptions as they will still be required. This rule change will support the success of planned interruptions once the isolation equipment is fully identified upon the initial site visit.

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

See response to Q1.4

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?

Momentum is not aware of any additional methods of communication or information that needs to be implemented as a result of this rule change.

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?

It is our understanding that MCs already have some access to NMI discovery so providing them with additional access is supported. Nevertheless we believe that networks should be included as the coordinator for extensive multi-site installations.

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?

The MC can obtain the NMI and site address from the NMI Discovery system and make written notices to each address with suitable notice periods to identify life support. When onsite the MC can seek EIC from relevant customers, if available, but onsite life support confirmation may require contact to the relevant retailers or the network.

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?

At this stage we do not believe there is any need for MCs to independently join the ombudsman scheme to manage disputes as these can be allocated to the initiating retailer that appointed the MC. The ombudsman scheme needs to be briefed, on this rule change, to ensure they realise that multiple retailers maybe involved to ascertain the responsible party.

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

No further issues at this stage.

Should you require any further information regarding this submission, please don't hesitate to contact me on 0478 401 097 or email randall.brown@momentum.com.au

Yours sincerely

[Signed]

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