



EnergyAustralia

LIGHT THE WAY

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Submitted electronically

Dear Commissioners

Review of the regulatory framework for metering services

EnergyAustralia is one of Australia's largest energy companies with around 2.5 million electricity and gas accounts across eastern Australia. We also own, operate, and contract an energy generation portfolio across Australia, including coal, gas, battery storage, demand response, wind, and solar assets, with control of over 4,500MW of generation capacity.

EnergyAustralia welcomes the opportunity to participate in the AEMC consultation, review of the regulatory framework for metering services (the Directions Paper). The extensive review has identified many issues that limit the efficient roll out of smart meters, and the associated resolutions proposed provide a well-considered range of options to rectify these inefficiencies. Our support and hesitancy of the proposals is dependent on the ability to accurately identify the need for change, that the cost for implementing is exceeded by the benefit, and that it achieves a better outcome for customers.

The rollout of smart meters has not occurred at the rate expected following the inception of the Power of Choice reforms; however, with the expectation that customers would drive the uptake not eventuating, and that metering is an intricate and complex intermingling of multiple parties, regulations, and interests, that ultimately inhibits efficiency, it is reasonable to suggest that the rollout has occurred as fast as possible. It is important to consider this when developing solutions to perceived problems, as any conceptual proposals efficacy will be limited if the underlying constraints are not addressed.

The Directions Paper has considered both, with practical solutions provided for identifiable issues in the installation process, and conceptual proposals that aim to improve perceived issues in obtaining the benefits of and incentivising further deployment of smart metering. EnergyAustralia believes this approach is appropriate, will produce greater customer satisfaction, promote cost reductions, and achieve increases in deployment rate.

Our preferences from the AEMC's proposals are below, followed by our response to the AEMC's questions which details our views, for or against, all proposals:

Accelerate roll out

- *Requiring meters to be replaced once they have reached a certain age, for example 30 years.*

Enable efficient access to data

- *Minimum contents requirements to standardise contracts and agreements on data exchange between market participants.*
- *Utilising an exchange architecture to facilitate a common interface for data exchange, with low obligation but a high incentive to participate.*
- *Negotiate-arbitrate for utilisation in access disputes.*

Align incentives

- *Spread the cost of installation across the parties who benefit.*

Improve installation processes

- *Retailers required to provide information to consumers prior to a smart meter being installed - process for obtaining, rights and responsibilities, and the services smart meters enable.*
- *Customers should be able to request a smart meter from a retailer for any reason.*
- *Removing the exemptions framework and replacing it with timeframe exemptions (unsafe site or remediation work needed):*
 - a. 60 BD timeframe for replacing family failure; and,*
 - b. 15 BD timeframe for individually identified malfunctions.*
- *Reducing the number of written notices a retailer needs to send - 15 BD before the proposed installation date.*
- *Removing customer opt-out provisions from Standard Retail Contracts.*

1. Benefits which can be enabled by smart meters

- a) are there other benefits which can be enabled by smart meters that are important to include in developing policy under the Review?*

The Victorian Advanced Metering Infrastructure (AMI/smart meters) rollout has enabled Victorian networks to consider what additional benefits they can obtain from their extensive coverage of metering. AusNet's 2022-26 Regulatory Proposal¹ highlights a range of current and proposed benefits smart meters can provide, aside from the commonly accepted benefits (near real-time meter reading and remote reconnection/disconnection):

Current benefits

- Alerts for when your solar stops working - AMI network collects the quantity of energy exported for its solar customers which is analysed to identify customers where no energy is being exported.
- Reducing energy theft - network intelligence system utilises voltage data collected by its AMI network to identify sites where electricity theft is occurring.
- Identifying and fixing faults before they become safety issues - Network intelligence system utilises data collected by our AMI network to identify low voltage service neutral faults.
- Prioritising life support customers in an outage - AMI meters have been configured to send alerts when life support customers experience a power outage.
- Correct mapping of the network to understand who is on and off supply - AMI network collects voltage data that enables our asset management team to accurately identify each customer's substation to ensure outage notifications are accurate.

¹ AusNet Services Regulatory Proposal 2022-26 pg. 11-14

- More accurate and timely approvals for solar and battery applications - DER approval tool uses data collected by our AMI network to provide an accurate assessment of DER capacity available to be installed at a customer's property.

Proposed benefits

- Notifying you when your energy use is unusual - network intelligence system will analyse customers' energy consumption data collected by our AMI network to identify unusual usage patterns
- Identifying and fixing faults before they become safety issues - Power quality data collected by the AMI network will be processed by our network intelligence system to determine areas of our network that are at risk of fuses "candling".
- Keeping critical customers on supply in an outage - AMI network will enable our distribution control centre to deploy targeted energy supply reductions, enabling vulnerable customers and other critical load to retain power supply during widespread outages.

Victorian networks commenced their rollout of smart meters in 2006, what AusNet's list of current and proposed benefits indicates is that networks can obtain a greater oversight of what is occurring on their network, and this will provide benefits to customers in reductions of the number and length of outages, or greater connection and operation of residential solar.

- b) *What are stakeholders' views on alternative devices enabling benefits? What are the pros and cons of these alternative devices?*

The benefits described above do not all require comprehensive cover of smart meters, they could mostly be achieved with one or two meter per street/feeder. Networks outside of Victoria could achieve these benefits by installing devices at a street/feeder level; with a pro being that this could be done without changing the current metering or regulatory framework, and a con being that the investment in alternative devices is likely to be greater than changing the frameworks to facilitate the use of contestable metering to provide these services.

2. *Penetration of smart meters required to realise benefits*

- a) *Do stakeholders agree that a higher penetration of smart meters is likely required to more fully realise the benefits of smart meters? If so, why? If no, why not*

From a retailer perspective, a higher penetration of smart meters will improve the basic needs of meter reading and remote connection/disconnection, thereby improving the service we provide to customers. However, the necessity of these services has not yet been driven by customers, with the main driver remaining the facilitation of additional connection requirements at their premises (Demand Energy Resources – solar).

- b) *Do stakeholders have any feedback on the level of smart meter penetration required for specific benefits? Or to optimise all benefits?*

Networks will need enough smart meter coverage to provide the additional services/benefits that can be achieved (fault detection, LR visibility, etc), whether a higher penetration of smart meters than is currently installed is required is unclear.

3. *To reach a critical mass in a timely manner, options to accelerate the roll out should be considered*

- a) *Do you consider that the roll out of smart meters should be accelerated? Please provide details of why or why not.*

We do not believe customers have a pressing desire for the roll out to occur any quicker, as we have only received 14% of our total requests for meters since Power of Choice from customers solely seeking to obtain the smart meter's benefits:

- 98,642 meters exchanged (excluding 87,179 new meter connections/installations);
- 69,367 for customer side alteration, such as solar, controlled load, or three-phase power – 71% of all exchanges;
- 14,859 meter fault replacements – 15% of all exchanges; and,
- 13,416 like-for-like, or customers requesting to upgrade their meter to solely obtain the benefits of a smart meter – 14% of all exchanges.

Newgate's research² indicates that ambivalence towards smart meters from customers could be due to a lack of understanding of the benefits of smart metering. The research did not educate respondents on the costs of smart metering, or alternative options for providing the 'benefits', therefore it is equally possible that customers would support receiving the benefits via cheaper alternatives.

However, EnergyAustralia is supportive of accelerating the rollout if efficiencies are prioritised to enable cost reductions. This support is derived from the benefits that we, as an energy retailer, receive from smart metering. A decision to increase the roll out of smart metering should be dependent on the net benefit of all impacted stakeholders, if this benefit does not exceed the expected costs then the roll out should remain linked to customer request or meter malfunction replacement.

b) What are the merits, costs and benefits of each option? Is there a particular option which would be most appropriate in providing a timely, cost effective, safe and equitable roll out of smart meters?

To achieve efficiencies in the roll out of meters, there needs to be greater availability for Metering Coordinators (MC) to arrange meter replacement. Retailers are hesitant to pursue a retailer led roll out due to the potential for negative publicity and customer dissatisfaction, instead opting to install meters via meter replacement reasons of fault - Meter Fault Notification Family Failure (MFF) and Meter Fault Notification Individual Identified (MFN) - or customer request.

Therefore, increasing the number of meters that can be replaced under an MFF would enable MCs to assign meter replacements in a more efficient manner, geographically based. Basic meters (type 5 and 6 meters) are extremely resilient, and with failure uncommon, the AEMC's proposal for metering to be replaced when it exceeds 30 years is reasonable.

Requiring replacement of meters that exceed 30 years is equitable, as it ensures that networks have recovered their metering costs, it will result in the greatest realisation of benefits (30-year gap in technology), and will facilitate a roll out of a significant amount of meters in a more timely/ targeted and cost effective/ efficient manner. The addition of a geographic trigger to the >30-year-old replacement requirement will promote these benefits further.

The AEMC should also consider how changes to the exemption framework and timeframe requirements would be impacted by the abundance of meter replacements that would be enabled following this change. Therefore, EnergyAustralia suggests that for MFN or this >30-year-old

² Newgate research - AEMC Metering Review pg. 25

requirement the current exemption rules apply; MFN or aged trigger, MCs provide exemption to AEMO which includes a replacement plan and how they intend to achieve it, they are this required to report on how they are conforming. This could be strengthened by requiring a percentage of the meters covered under an exemption to be replaced annually.

c) *How would each of these options for rolling out smart meters impact the cost profiles of smart meters?*

Option	Cost impacts
Replace meters once they reach a certain age, >30 years	<ul style="list-style-type: none"> • Views below are based on the proviso that MCs will be able to obtain an exemption from the meter installation timeframes, due to the scale of meters requiring exchange (>30 years) and the resource constraints of the MCs. • MCs would be able to exchange many more meters as a meter fault, this would create efficiencies in the deployment as the replacement could be targeted geographically and where it is economical to do so. • The efficiencies would reduce the installation costs, incentivising MCs to install more meters. • Depending on the contract retailers have with their MCs, the reduction in installation costs could be passed through, or they could benefit by installing above certain quotas of meters per year.
Percentage of total customers meters installed per year	<ul style="list-style-type: none"> • MCs would have a target to achieve annually, they could arrange installations to achieve this target that are economical. • The requirement for extensive meter exchanges in the initial year, and reductions each year after, would create inefficiencies in resourcing for MCs. • This option would require meters to be exchanged regardless if there was a meter fault requirement, requiring retailer roll-out. • The costs for a retailer roll-out are greater than meter exchange due to meter fault or customer request, retailers would require additional resources to handle customer feedback, respond to negative publicity, and most importantly, would need to reconsider who is financially responsible for customer side rectification. • Achieving retailer-MC installation quotas, may initially see reductions in cost per installation, yet this would become less likely as the bulk of the meters are replaced in the initial years.
Backstop, 90% of meters to be installed by 2030	<ul style="list-style-type: none"> • MCs would have a target to achieve and could produce an installation program that is efficient and economical, thereby reducing costs to install. • MCs would need to increase resources to achieve the installation requirements pre-2030, increasing costs. These resources would no longer be required upon completion of the 90% target. • This option would require meters to be exchanged regardless if there was a meter fault requirement, requiring retailer roll-out. • The costs for a retailer roll-out are greater than meter exchange due to meter fault or customer request, retailers would require additional resources to handle customer feedback, respond to negative publicity, and most importantly, would need to reconsider who is financially responsible for customer side rectification.

- d) *Are there other options that you consider would better provide a timely, cost effective, safe and equitable roll out of smart meters?*

EnergyAustralia believes that from a customer's perspective the current framework and timeframes for the roll out of smart meters is achieving the objectives listed. There are pros and cons to each of the proposals provided, and we have not discovered any additional solution that is void of the risks.

4. *Options to assist in aligning incentives*

- a) *What are the costs and benefits of each option? Is there a particular option which would best align incentives for stakeholders?*
- b) *Are there other options that you consider would better align incentives?*

EnergyAustralia appreciates the AEMC's consideration for aligning incentives, as any consideration for sharing the burden of costs should improve the appetite for retailers to increase the roll out of smart metering.

We are cognisant that any sharing of costs must be appropriately aligned to the benefit obtained and should ensure customers are not financially deprived by the development of the new incentive framework. Ultimately, this would require contribution to the cost of metering to be applied where the benefit achieved would be least cost than an alternative option. With distribution networks as the obvious example, the benefit they could obtain from access to the benefits provided by smart metering, would have to cost them less than the alternative of installing infrastructure to achieve that benefit.

The Directions Paper did not provide any substantiation that networks were unable to obtain the required data elements from smart metering and that they were forced to install their own infrastructure as a result of MCs reluctance to provide this data. This assumption, and the assumption that networks have a significant desire for access to additional metering data, has supported the development of the incentive proposals. EnergyAustralia is reluctant to support any of the proposed options, and cannot provide reliable cost and benefit analysis, without evidence that networks require access to additional metering data, are unable to obtain it, and the cost of obtaining would be significantly less than a network alternative.

We believe that the least cost consideration for incentive arrangements would limit any option that was overly complex, as implementation and running costs would offset the benefits achieved. Therefore, the options of revenue streams for provisions of specific data, or the ability for multiple parties to be responsible for metering, are too complex when compared with the existing framework and are unlikely to produce a benefit that exceeds the cost.

The option to spread the cost of meter installation across the parties who benefit, appears to be the simplest form of applying the costs to align with the benefits received:

- Networks that are benefitting from the installation of smart meters, potentially for greater access to power quality data, could calculate the cost for obtaining this data through additional infrastructure installed on the network.
- They would then add this and all other costs foreseeable in achieving the benefits received, and this would form the value they are receiving from the installation of smart metering.
- This amount would then need to be considered against what the AER would approve for cost recovery across a network determination period.

- This amount could be provided to the MC/MDP/MP, whichever party is best suited to providing the required service, and the additional revenue would result in a reduction in the cost to serve these parties pass through to the retailer.
- The end result would be that networks are procuring their requirements at least cost, which reduces the network costs to customers, and that retailers will reduce the pass through cost of competitive metering when their contracts with the MC/MDP/MP are adjusted.

5. *The current minimum service specifications enable the required services to be provided*

- Do you agree with the Commission's preliminary position that the minimum service specification and physical requirements of the meter are sufficient? If not, what are the specific changes required?*
- Are there changes to the minimum service specifications, or elsewhere in Chapter 7 of the NER, required to enable new services and innovation?*

The minimum service specifications are currently suitable for existing required services; however, the evolution to a two-sided market will create additional 'minimum' requirements. Dynamic Operating Envelopes, Frequency Control Ancillary Services, and the ability to remotely control loads (export & consumption) will be required, as evidenced by the South Australian Department for Energy and Mining's new requirements that all new or replacement meters must be multi-element and all new DER connecting must utilise a multi-element meter. These requirements may be better suited to standardised control through customer metering, but it is not clear yet if this will be the most cost effective or efficient method.

We believe that the additional requirements for metering specifications should be guided by the parties that seek to benefit from the additions; AEMO, distribution networks, Demand Response Service Providers, etc. If these parties are unable to indicate the requirements they foresee as necessary, then the current specifications are suitable.

- What is the most cost-effective way to support electrical safety outcomes, like neutral integrity? Would enabling data access for DNSPs or requiring smart meters to physically provide the service, such as via an alarm within the meter, achieve this?*

Neutral integrity alarms within the meter are the best approach; however, this is not currently a function of the meter and it would likely require software and hardware changes to accommodate. Alternatively, the meters have an existing capability to provide current and voltage, this can be analysed periodically by the MC/MP/MDP, and then if the analysis identifies a problem, an alert can be provided to network or retailer.

- Do you agree smart meters provide the most efficient means for DNSPs to improve the visibility of their low voltage networks? Why, or why not? What would alternatives for network monitoring be, and would any of these alternatives be more efficient?*

As the meters are, and will be, installed throughout the LV network, it is a reasonable assertion that use of their data would be the most efficient method for providing LV network visibility; however, this is dependent on whether there are enough meters to provide the depth of data required, the timeframe for this meter exposure level to be reached, and the cost of procuring this data, compared with the timeframe and cost of installing additional infrastructure to monitor the LV network.

- Can smart meters be used to provide an effective solution to emerging system issues?*

Smart meters can (if specifications are changed) provide control of customer load, this ability to either allow export/consumption or to limit it, is an option for addressing minimum demand and other similar emerging issues. As all properties will have a smart meter, especially those with DER, having the control at a meter level instead of another device (inverter, etc) is appropriate; conforming with a single standard/specification would reduce complexity for parties interacting with the meters.

6. *Enabling appropriate access to data from meters is key to unlocking benefits for consumers and end users*

- a) *Do you agree there is a need to develop a framework for power quality data access and exchange? Why or why not?*

EnergyAustralia's MC Vector Metering has advised that they have received no request for access to any additional data streams their meters can provide. This does not confirm there is no need for access to the available data but implies that the need is not great. Therefore, the development of a framework should rely on limiting cost unless they are exceeded by an identifiable benefit.

- b) *Besides DNSPs, which other market participants or third parties may reasonably require access to power quality data under an exchange framework? What are the use cases and benefits that access to this data can offer?*

It is unlikely that power quality data would be required for any market participant or third party other than distribution networks. There is a potential that manufacturers of appliances, that are adversely impacted by power quality outside their safe operating ranges, may have a desire to obtain this data, as a form of evidence that damage was not the fault of the manufacturer, or to empower their control; As an example, the manufacturer could restrict operation if the power quality was not within the suitable range.

- c) *Do you have any views on whether the provision of power quality data should be standardised? If so, what should the Commission take into consideration?*

No evidence was provided in the Directions Paper for a gap in the provision of power quality data that would be improved with standardisation. However, if networks can outline and substantiate a need for power quality data, then this should be standardised, and the provision should utilise the existing data transfer options (B2B).

- d) *Do you consider the current framework is meeting consumers' demand for energy data (billing and non-billing data), and if not, what changes would be required? Is there data that consumers would benefit from accessing that CDR will not enable?*

EnergyAustralia believes the current framework is meeting consumers' demand for energy data. There is no evidence that customers require more timely access, or a need for additional metrics. With the development of the CDR, it is possible that Accredited Data Recipient (ADR) will innovate with currently available data and identify new data requirements to meet expanding customer's needs, but this can be considered when it occurs.

7. *Feedback on the initial options for data access that the commission has presented*

- a) *What are the costs and benefits of a centralised organisation providing all metering data? Is there value in exploring this option further? (e.g. high prescription of data management).*

- b) *What are the costs and benefits of minimum content requirements for contracts and agreements for data access to provide standardisation? Would such an approach address issues of negotiation, consistency, and price of data?*
- c) *What are the costs and benefits of developing an exchange architecture to minimise one-to-many interfaces and negotiations? Could B2B be utilised to serve this function? Is there value in exploring a new architecture such as an API-based hub and spoke model?*
- d) *What are the costs and benefits of a negotiate-arbitrate structure to enable data access for metering? Is there value in exploring this option further? (e.g. coverage tests or nonprescriptive pricing principles).*
- e) *Are there any other specific options or components the Commission should consider?*

NERA's options of establishing minimum contents requirements to standardise contracts and agreements on data exchange between market participants, and a negotiate-arbitrate option for access disputes will provide clear direction for those that are providing, and seeking the additional data a meter can provide. Both options are low cost to design and establish, and the costs only increase if the negotiate-arbitrate option is required, which seems the appropriate level of financial contribution for a framework that has not yet established a defined need.

Minimum content requirements for contracts and agreements could establish the data exchange of common data elements, it would be hard to include the price of the data as this is likely to fluctuate based on the scope of the request.

Utilising existing exchange architecture (B2B) should be employed for any element that can be standardised, with an emphasis on ensuring the use of the exchange infrastructure does not result in excessive costs, as if this is the case the transfer of data would be better handled through a contract between the parties seeking the information.

A centralised organisation for providing all metering data would be costly to implement and operate, and without substantiation of the need for the increased prescription in data management it is unlikely the benefit would outweigh the cost. The benefit of having a centralised data storage option is minimal as there are alternative options for providing access to the required data either stored centrally (MSATS or CDR) or across many data holders (via APIs).

EnergyAustralia believes a blend of the options is preferable, with utilisation of an exchange architecture suitable for networks requesting standard power quality data, the minimum content requirements allowing agreement for data elements that are less common and for third parties not operating in the B2B framework, and finally a backstop of the negotiate-arbitrate framework to ensure any dispute can be impartially negotiated.

8. *A higher penetration of smart meters will enable more services to be provided more efficiently*
- a) *Are there other potential use cases that third parties can offer at different penetrations of smart meters? What else is required to enable these use cases?*
 - b) *Noting recommendations in incentives and the roll out, are there other considerations for economies of scale in current and emerging service models?*

Aside from the outlined benefits that additional metering data could provide to distribution networks, there has been very little appetite of third parties for access to metering; either the data elements or for additional controls.

Registered Electrical Contractors (REC), DER manufacturers, DRSP operators, and other third parties adhere to, conceivably could seek additional data or control access, as this may be a more cost

effective or efficient method of understanding and controlling what is occurring at a customer's property; compared with a requirement to install additional infrastructure to achieve the same result.

The third parties that may see benefit in accessing meter data or control, mostly do not require a higher penetration of smart meters (other than an REC that may want to investigate voltage at any property), as the sites they have already received a meter upgrade to allow the installation of the device the third parties require control over. Further, third party access would be complicated and limited by strict data security requirements.

9. *Improving customers' experience*

- a) *Do you have any feedback on the proposal to require retailers to provide information to their customers when a smart meter is being installed? Is the proposed information adequate, or should any changes be made?*

EnergyAustralia supports improvements in customer communications, and we currently provide additional information to our customers on the installation of smart metering. We can also appreciate that customers would benefit from receiving information about smart meter benefits; what they do, and enable. Consistency amongst retailers on the information that is provided will provide confidence to customers.

In establishing the information that is to be provided and determining how it should be presented, the AEMC should provide flexibility for retailers to produce correspondence that aligns with retailers understanding of customer's preference and capacity to absorb information. Setting minimum content requirements can be restrictive and may not be suitable for this type of correspondence, as meter installation and benefits of smart meter information traverse a broad spectrum of elements; the required information to cover all potential elements will be onerous to maintain (if regulated) and present, with the subject matter already complex, simplicity should be prioritised.

- b) *Should an independent party provide information on smart meters for customers? If so, how should this be implemented?*

Independent parties currently provide information on smart meters to customers, with the AER, Vic Government (DELWP), Choice, and Canstar Blue among a plethora of sites that result from any internet search on the subject. Any additional information provided is likely superfluous, particularly if the requirement for retailers to provide more information is implemented.

- c) *Should retailers be required to install a smart meter when requested by a customer, for any reason? Are there any unintended consequences which may arise from such an approach?*

EnergyAustralia supports requiring retailers to install a smart meter following the request – for any reason – of a customer. As discussed above, we currently provide this service, and since Power of Choice commenced 14% of our meter exchanges have been for this reason.

10. *Reducing delays in meter replacement*

- a) *Do you have any feedback on the proposed changes to the meter malfunction process?*
b) *Are there any practicable mechanisms to address remediation issues that can prevent a smart meter from being installed?*

Requiring MFN meter exchanges for family failures (60BD) is only suitable if there is an exemption process; as a family failure can result in many thousands of meters, resourcing and geographic constraints, will limit the ability to exchange within the timeframe. This will be particularly evident if meter replacement is required once they exceed an age threshold (>30 years old), as this will result in a plethora of meters requiring exchange.

As discussed previously, we believe the existing exemption framework provides the appropriate framework to MCs to request an extension from the timeframe requirements. The process could be improved by requiring MCs to provide a clear outline of their replacement program and to meet time-based installation quotas, and by requiring the AER to be more attentive that they are complying.

EnergyAustralia is supportive of the timeframe for exchanging faulty meters being 15-business days.

11. Measures that could support more efficient deployment of smart meters

- a) *Do you have any feedback on the proposal to reduce the number of notices for retailer-led roll outs to one?*

EnergyAustralia supports reducing the number of notifications required for a retailer-led roll out to one, as this provides the customer notification of a retailer's intent, allowing them to contact and request the communications element disabled, if they wish.

The Planned Interruption Notification (PIN) provides customers with a reminder that their meter will be exchanged. EnergyAustralia believes all notification requirements for metering should be reduced, as the PIN is currently an additional notification providing a very similar alert, and a reduction in notification requirements will correspond with reductions in cost to serve.

- b) *What are your views on the opt-out provision for retailer-led roll outs? Should the opt-out provision be removed or retained, and why?*

Customers can currently request the communication element of a meter be disabled if they have health concerns that relate to the transmitting capabilities of smart meters, and customers on Market Retail Contracts accept that their retailer can install a meter, it is therefore reasonable that Standard Retail Contracts are amended to remove the opt-out provisions. This will not reduce customer protections, as they can still address any health concerns by requesting communications elements be disabled, and will improve retailers capacity to efficiently roll-out meters, by reducing an additional regulatory impedance.

- c) *Are there solutions which you consider will help to simplify and improve meter replacement in multi-occupancy premises? Should a one-in-all-in approach be considered further?*

The simplest solution is to allow an MC to install all meters at once, this will reduce the outages customers experience and remove the risk of additional meters not being able to fit in the metering enclosure (meter board). Deciding which MC will install the meters between the MC that initially identified the shared fuse, the MC/FRMP with the most customers at the site, or a more complex tendering process to identify the least cost option from a range of MCs, is far more complex.

However, each option is reliant on MCs being able to conduct the work on behalf of any retailer. Something that is currently not possible, as all MCs do not have contracts with all retailers. Therefore, we suggest that a standard contract should be established that will exist in the event a

retailer and an MC do not have a prevailing contract, this standard contract should consider pricing, safety, and liability. With an expectation the standard contract will be less than optimal for both retailer and MC, this will hopefully lead these parties to agree to a market contract.

Once there is no encumbrance from a lack of contract between retailer and MC, the shared multi-occupancy replacement preference can be considered based on what will achieve the fastest result, and what will be the most cost efficient.

12. Feedback on other installation issues

- a) *Do you have feedback on any of the other installation issues raised by stakeholders? Are there any other installation issues the Commission should also consider?*

Customer side rectification issues can be classed into three broad areas:

1. Meter board limitations – space, etc.
2. Environmental – asbestos, etc.
3. Defects – wiring, etc.

EnergyAustralia's view is that the requirement for rectification of each remains with the customer, as an equitable option for apportioning the cost is not currently feasible; why should some customers pay for rectification and others not? Who would be liable if rectification works created another issue?

We understand that rectification is more likely to occur when a distribution network is involved to advise the customer their site is non-compliant, whereas rectification is less likely when the non-compliance is solely advised by the retailer or MC.

Therefore, we suggest that all possible reasons for a meter installation failing (excluding temporary issues like locked gate or dog at premises) should be considered a level one defects. This would then allow the distribution network to impose a non-compliance defect on the property, requiring the customer to rectify.

Funding for rectification should remain with customers, regardless if they have requested the meter or not, as there is a defined need for metering it is reasonable that rectification of non-compliance occurs. If a customer is unable to afford the rectification, then the decision is with the retailer/MC on whether they fund the rectification work.

Without precise data on the scale of the issue, it is reasonable to assume this will not occur regularly; therefore, this is the simplest method for addressing this issue, with any cost recovery for this investment likely to be transferred to increased cost to serve, or potentially as an element in the Default Market Offer.

13. Improvements to roles and responsibilities

- a) *Are there any changes to roles and responsibilities that the Commission should consider under this review? If so, what are those changes, and what would be the benefit of those changes?*

EnergyAustralia has not identified any changes to roles and responsibilities that create efficiencies that would justify the change, when compared with the cost incurred in establishing the current framework and the additional cost to accommodate further changes.

If you would like to discuss this submission, please contact me on 03 9060 1361 or Travis.Worsteling@energyaustralia.com.au.

Regards

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