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30 May 2024

Ms Anna Collyer
Chair, Australian Energy Market Commission
Level 15, 60 Castlereagh St
Sydney NSW, 2000

Reference code: ERC0378

Dear Anna

Response to accelerating smart meter deployments draft determination

AusNet welcomes the opportunity to provide this submission to the Australian Energy Market Commission's (AEMC) draft Rule determination accelerating smart meter deployments. The draft Rule determination comes after AEMC's Review of the Regulatory Framework for Metering Services recommending changes to promoting a fast, efficient, and effective deployment of smart meters with the mandatory provision of Power Quality (PQ) data.

We support the acceleration of smart meter deployments in the jurisdictions that are still yet to achieve a universal take up. AusNet has already achieved this objective with smart meters installed at 99% of small customer premises and contestable smart meters installed at 100% of large customer premises. Our small customer smart meters provide us with hourly collected 5-minute PQ data. We understand how valuable PQ data is and support the provision of available basic PQ data to distribution network service providers (DNSPs).

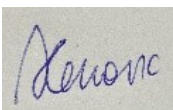
However, we are concerned by unintended consequences of the proposed rule changes in Victoria where the smart meter regulatory framework is inherently different to other jurisdictions. The proposed rule changes would apply requirements to establish and communicate Legacy Metering Replacement Plans and adhere to the Shared Fusing Meter Replacement Procedure, which would come at additional costs to Victorian distributors (who own and operate the smart meter infrastructure) without any benefit to Victorian customers. The S346 12 October 2017 Ministerial Order under section 16BA of the National Electricity (Victoria) Act 2005 and other AMI (Obligations to Install Meters) Orders applies the regulatory framework in Victoria, which includes arrangements for legacy meters.

AusNet recommends the AEMC amend the draft Rule to reflect the regulatory framework in Victoria. The proposed accelerated rollout should not apply to meters installed pursuant to the Victorian AMI Orders.

Additionally, for existing contestable metering the provision of PQ data will require changes to IT systems. We are aware that some contestable metering data providers will require IT system changes to provide PQ data to the relevant DNSP. Therefore, we recommend extending the effective date for the delivery of PQ data for existing large customer meters to July 2026 to allow time to specify, procure, test and deploy new or amended IT systems.

If you have any enquiries, please do not hesitate to contact Justin Betlehem on 0433691111 or justin.betlehem@ausnetservices.com.au.

Yours sincerely



Sonja Lekovic
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AusNet