30 May 2024

Ms Anna Collyer
Chair
Australian Energy Market Commission

Project Reference Code: ERC0378

Dear Ms Collyer

Draft Determination on accelerating smart meter deployment

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Commission (AEMC) in response to its *Accelerating smart meter deployment* draft determination.

The attached submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers (DNSPs), Energex Limited and Ergon Energy Corporation Limited;
- Regional service delivery retailer, Ergon Energy Queensland Pty Ltd; and
- Affiliated contestable business, Yurika Pty Ltd and is subsidiaries, including Metering Dynamics Pty Ltd trading as Yurika Metering.

We broadly support the AEMC's positions in the draft determination, recognising that the reform is essential to achieve the Queensland Energy and Jobs Plan's target of 100 per cent penetration of smart meter devices with appropriate data sharing arrangements by 2030.

We also support the AEMC's position that opt-out provisions which allow small customers to decline a replacement smart meter be removed from 25 July 2024. In our view, removing the ability to opt-out is crucial to the success of full smart meter deployment. On that note, we take this opportunity to reiterate our previous recommendation that the AEMC also remove the ability for a customer to voluntarily disable the communications function of a smart meter. In our view allowing a customer to disable the communications function conflicts with the intent of the rule change proposal and dilutes the benefits of smart meter deployment. Further, it is Energy Queensland's experience that needing to physically read a meter places the meter reader at risk of physical harm from both customer abuse and dog attack.

The AEMC's draft determination provides that metering service providers deliver 'basic' power quality data (PQD) to DNSPs at no direct charge, with the provision of more 'advanced' PQD to be commercially negotiated. However, we recommend the AEMC clarify the difference between basic and advanced PQD. Previous discussions in the B2B/Metering Services Working Group and the AEMC's accelerating smart meter deployment rule change Reference Group provide the AEMC with a basis on which to do so. We support the AEMC's draft position that DNSPs would gain access to basic PQD from 26 June 2025. Provision of this data in near real time as soon as possible will have multiple network and community benefits, including the ability to quickly detect faults that pose a threat to public safety.

Energy Queensland's more detailed views on the components of the proposed reforms, including a significant number of issues for which we seek clarification, are included in the enclosed feedback. Neither this letter nor our enclosed comments contain confidential information.

Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact me or Andrew Bozin on 0436 447 814.

Yours sincerely

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Enc: - Energy Queensland's detailed feedback on the AEMC's draft determination

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AEMC – Accelerating smart meter deployment

AEMC Draft Determination (reference number ERC0378), submissions due 30 May 2024

Section / subsection of the AEMC Draft Determination	Energy Queensland commentary
Section 3: How our rule would operate	
3.1.2 The draft rule would require industry to collaborate on planning and delivery	The AEMC noted the draft rule would require distribution network service providers (DNSPs) to communicate the legacy meter replacement plan (LMRP) meter replacement schedules to retailers. For example, 'by no later than 29 June 2025, DNSPs must record the LMRP meter replacement schedules in the Market Settlements and Transfer Solutions (MSATS) system, in accordance with relevant procedures.'[1] To avoid excess transaction traffic and enable visibility of the LMRP across market participants, we recommend adding a field in MSATS that contains the scheduled year of meter replacement. We also recommend the addition of some form of information on the practical sequencing of metering change-out, to ensure deployments are completed efficiently i.e., to premises in close proximity, if not door-by-door in a street. While this may be outside the scope for the AEMC's rule determination and more relevant to the Australian Energy Market Operator's (AEMO) subsequent supporting implementation efforts, we raise this issue here because choices around the detail of information within MSATS will have significant implications in relation to process and workload, and ultimately the deliverability of each DNSP's LMRP.
3.2.1 The draft rule would give DNSPs better access to 'basic' PQD	The AEMC noted the draft rule would provide DNSPs with better 'basic' power quality data (PQD) access. Energy Queensland welcomes the enablement of better access to PQD. However, the AEMC should clarify the meaning of DNSPs accessing this data 'free of direct charge'. A practical example that explains the difference

[1] https://www.aemc.gov.au/sites/default/files/2024-04/draft_rule_determination_-_accelerating_smart_meter_deployment.pdf, page 14.

Section / subsection of the AEMC Draft Determination	Energy Queensland commentary
to unlock a range of benefits for stakeholders	between a direct charge and an indirect charge would be beneficial for the relevant participants and is important given that the draft determination's section 3.2.3 recommends a related new civil penalty. We would also welcome further clarity from the AEMC on the delineation between what constitutes basic and advanced PQD, and the frequency of data availability and the specific data fields that would be made available for each type of PQD. These were the subject of extensive discussions amongst the members of the B2B/Metering Services Review Working Group (B2B/MSR WG) and the draft determination also does not reflect discussions in the AEMC's accelerating smart meter deployment rule change Reference Group. We also note the AEMC's draft determination refers to obligations for the provision of 'basic' PQD but the rule and definition only notes PQD. Clearly defining the difference between basic and advanced PQD in the rules will be essential. The AEMC should also clarify what occurs when a Metering Coordinator (MC) has an agreement to provide advanced PQD in place with a DNSP. It is unclear whether the MC will have to also provide basic PQD for those NMIs, or whether the provision of advanced PQD would exclude those NMIs from the basic PQD obligations? We note that given the delivery method and schedule, as well as the data format, the two may be different. It is important to note that feedback and costings provided throughout the Metering Services Review were based on the metering services providers providing PQD direct from headend systems without the need for data validation, substitution or storage. The draft determination now requires the Metering Data Provider (MDP) to process and manage PQD as metering data i.e., through meter data management systems and requiring data validation, substitution and storage. The associated costs will be significantly higher than the costs metering service providers have previously indicated. Costs escalate sharply as the data provision interval decreases and the data content increases. Furthermore, once the AEMC has clarified the difference between basic and advanced PQD, to support MCs offering advanced PQD under commercial arrangements, in addition to the draft National Electricity Rules (NER) amendments as part of this draft determination,[2] the AEMC could amend clause 7.6.1(b) to include a reference similar to the underlined text below:

[2] https://www.aemc.gov.au/sites/default/files/2024-04/draft_national_electricity_amendment_accelerated_smart_meter_deployment_rule_2024.pdf

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	7.6.1(b) Subject to the terms of its appointment under clause 7.6.2 and in accordance with the Rules and procedures authorised under the Rules, a Metering Coordinator may supply services in respect of the metering installation in addition to those provided under paragraph (a), including access to the services provided by the metering installation, and metering data and advanced power quality data from the metering installation, on terms and conditions (including as to price) to be commercially agreed between the Metering Coordinator and the requesting party.
3.3.1 The draft rule would prohibit retailers from imposing any upfront charges for new smart meters	The AEMC noted that prohibiting upfront charges would mitigate social licence risks. Energy Queensland supports the intent of the proposed prohibition on retailers charging upfront fees for the installation of smart meters for small customers under the LMRP and welcomes the social license considerations put forward by the AEMC. However, the AEMC should clarify in its final determination that this prohibition would not apply in limited situations where a retailer seeks to recover the cost of using a low-cost solution to enable the planned exchange of the meter which avoids a higher-cost remediation that a customer would likely not accept. Practical examples include adding meter backing boards or extending wiring. Enabling these types of low-cost fixes to occur will better enable the achievement of the 2030 target. With the AEMC including social licence as a consideration for this rule determination, we also consider the AEMC should examine the pros and cons of expanding the prohibition to cover smart metering installations resulting from customers installing new equipment at their premises, such as solar photovoltaic systems and/or batteries. While considered 'customer initiated' meter exchanges, in many cases customers installing behind-the-meter assets are unaware of the associated need to replace their basic meter/s. Under the draft determination, there will be situations where if a customer delays the installation of a solar PV system by only a short period of time, they will not face an upfront cost for their smart meter because it is installed during that period under the LMRP.

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3.4.1 The draft rule would enhance information provided to customers before a meter upgrade	The AEMC noted the draft rule would require retailers to provide customers with additional information before a smart meter upgrade. In our view, the proposed change for the National Energy Retail Rules (NERR) clause 59A(2) requiring retailers to issue the small customer a notice no earlier than 60 business days and no later than four business days before the retailer replaces the small customer's meter—regardless of the trigger for the replacement —should be reworded to exclude a meter replacement triggered by a meter malfunction or at the request of the customer. These scenarios have well-developed processes in place to manage the metering works and the current draft rule has the potential to significantly delay the meter exchange process. The draft rule would require retailers to provide customers with additional information associated with the smart meter upgrade, as set out in the draft determination's Box 8. We understand this information would set the minimum requirement and that retailers could provide additional information to their customers. In our experience, customers would benefit from the following additional information being provided: • the ways that customers can adjust their usage to optimise their retail bill under the tariff that has been assigned to them; • other primary tariffs that are available to the customer following the installation of the smart meter; and • how customers can undertake a comparison of those tariff options. Provision of this information is also likely to benefit retailers by reducing the number and complexity of tariff-related queries (particularly around demand charges) from customers after the smart meter is installed. Our DNSPs are supporting customers with web content around tariff reform[3] and we support retailers doing the same.

[3] For example https://www.energex.com.au/manage-your-energy/save-money-and-electricity/tariffs/residential-tariffs

Section / subsection of the AEMC Draft Determination	Energy Queensland commentary
3.4.2 The draft rule would empower customers to request and receive a smart meter for any reason	Energy Queensland notes the draft determination's proposed change to enable customers to request a new meter for any reason, and the mandatory requirement for the installation to be completed within the standard timeframe set out in the NER clauses 7.8.10A to 7.8.10C i.e., 15 business days from receipt of valid request. We are concerned this timeframe does not consider the complexities of arranging metering installs in regional and remote areas where customer density is low, distance between jobs is greater, and installer resources are limited. Energy Queensland first raised this issue in 2018,[4][5] with our retailer (Ergon Energy Queensland (EEQ)) and metering services provider (Yurika) facing this challenge daily in serving customers connected to some of the longest rural feeders in the NEM, in one of the lowest density retail areas in Australia. We also expect competition for limited technical resources, across jurisdictions and with other industries, in pursuit of the 100% smart meter target over the next five years. We are also concerned that no mechanisms appear to have been considered to address scenarios where customers request new meters in very large numbers and retailers are obliged to complete the install within the standard 15-business day timeframe, including: • customers with many individual sites (dozens or even hundreds) who submit requests for new meters, noting EEQ is already receiving such requests; and • customer groups or communities that organise to request exchanges simultaneously. Energy Queensland suggests very few customers agree to an alternative timeframe when advised of the mandatory timeframe. We therefore recommend that the AEMC's final determination: • include flexibility for retailers in these circumstances similar to the treatment of failed meter families; and • consider whether the current exemption processes can accommodate these situations, noting that the Australian Energy Regulator ultimately retains discretion.

[4] https://www.aemc.gov.au/sites/default/files/2018-07/Energy%20Queensland.pdf, section 2.1.
[5] https://www.aemc.gov.au/sites/default/files/2018-11/Energy%20Queensland%20-%2020181025.PDF, section 2.1.

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	EEQ raised this issue with the AEMC during direct engagement as part of the Metering Services Review and received assurance that the framework would address this concern. EEQ is available to assist the AEMC to develop a workable solution that balances customer rights with the practicalities of meter installations in regional areas.
3.5.1 The draft rule would remove customer opt-out provisions, help achieve the 2030 target and would not require customers to remediate site defects	<u>Removing customer opt-out provisions</u> In the interest of equity and maximising benefit to customers, Energy Queensland supports the removal of provisions which enable customers to opt-out of meter exchanges and the need to provide customers with two notifications prior to a new meter deployment. We agree these changes will streamline the deployment of smart meters. Despite the efforts of the AEMC and industry to promote the accelerated metering deployment, there are, and will continue to be, customers who oppose their meter being exchanged. Removal of the opt-out provision will likely increase the incidence of customers refusing access to their property via locked gates or unrestrained dogs, while others will require appointments, ignore communication attempts or not agree to reasonable appointment times. Despite a legal right to enter premises, retailers and meter installers have very little real power to enforce access without risking safety hazards. Solutions such as cutting locks (where it is legal to do so) or arranging police escorts or animal handlers are undesirable, unworkable and prohibitively expensive. The framework must change to protect the safety of installers and remove the current limitations on retailers. During consultations and subsequent engagement with the AEMC as part of the Metering Services Review, the AEMC provided assurance the framework would address this concern akin to sites with unsuitable switchboards. EQL also expects that Type 4A metering installations will become the new 'form' of opt-out for some customers. We remain of the view that Type 4A meters should only be allowed where reliable access to a telecommunications network is not available – it should not be a matter of customer choice. Again, we highlight the safety concerns for meter readers who will be required to enter properties and face threats such as abuse and unrestrained dogs. These risks can be entirely avoided with remote reading of smart meters, promoted as one of the major advantages of the technology. Continuing to permit the use of Type 4A meters where reliable communications is

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	available dilutes the efficiency of full deployment. We also consider that the AEMC should clarify whether the current provisions to opt-out of the remote meter reading capability will also be removed, noting the deployment of Type 4A meters affects the acquisition of useful PQD. <u>Not requiring customers to remediate site defects</u> We also note the gap in the framework for circumstances where a legacy meter fails and requires replacement, but the site has defects (non-safety-related) that require rectification to install the new meter yet the customer refuses to fix the defects. These instances place retailers in a difficult position as: • they have no power to enforce rectification of non-safety related defects to enable a working meter to be installed at the premises; • perpetual use of estimated reads for customer billing is not an appropriate long-term solution; and • disconnection is only available where customers do not provide access under the NERR clauses 113 (1) and (2) or for health and safety reasons under NERR clause 119(1)(g) – regardless, the threat of disconnection is not a realistic or acceptable solution for a retailer and there is no incentive for a customer to enable the new meter install. Energy Queensland therefore recommends the AEMC specifically address how the framework would deal with customers whose legacy meter fails but who refuse to rectify non-safety-related defects to enable installation of a replacement meter, including: • the arrangements to be developed and who will develop them; • whether retailers can exclude these customers from smart meter deployment programs and LMRPs; and • the standard of evidence required to demonstrate genuine instances of customer refusal to allow a meter exchange.

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3.5.2 The draft rule would reduce the number of retailer notices issued to customers before a meter upgrade	<u>Notices related to defective customer installations</u> Energy Queensland acknowledges the challenges of deploying replacement metering at premises with technical defects. Our retailer, EEQ, incurs the cost of minor remedial action where necessary to avoid a wasted truck visit and complete the meter exchange (for example, minor works include the use of mounting boards for installation on non-friable asbestos or timber switchboards and extending customer wiring). However, the proposed new obligations to manage defects at customer premises, requiring the MC to provide a defect notice at site and requiring retailers to send two notices and a third unspecified attempt to contact the customer, will create significantly more work for retailers, undermining the benefit claimed by the AEMC from removing the two-step notification requirements for new meter deployments (including opt-out). In EEQ's experience, customers typically give little regard to the notices retailers provide, so requiring retailers to send multiple new notices to customers to undertake repairs, which may be costly and inconvenient to arrange, is unlikely to promote action by customers to rectify defects. Instead, the changes will generate more cost for retailers when the focus should instead be on supporting customers with rectification. If a customer disregards the first notice, then they are likely to disregard subsequent notices and attempts by retailers to contact them. A workable alternative would be for the MC to provide a defect notice to the customer while on site and for the retailer to provide one additional notice to the customer. If the customer fails to advise the retailer that the defects have been rectified within the stated timeframe, then the site should be removed from the deployment plan. <u>Clarifying what constitutes a meter defect</u> The AEMC should also provide policy guidance on the types of meter defects that can stop the installation of a new meter, for example by establishing the criteria for deeming a site as being unsuitable. There are situations where switchboards that do not strictly comply with the location requirements in the latest versions of Service and Installation Rules but are otherwise safe are being classified as defective, for example, where the switchboard is too far from the front of the property or too close to a pool. It will be important for the AEMC to clarify how 'legitimately' unsuitable sites—for instance the existence of high-risk (friable) asbestos for which there is no simple

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	and safe quick fix—are classified and differentiated, and in addition, whether defect notices can be challenged by the customer. We also recommend the AEMC consider: • an early commencement of the proposed arrangements for defective switchboards. While this may present challenges in the short term, this approach would enable customers to act earlier. • to incentivise the accelerated meter deployment, the limited circumstances in which retailers could be enabled to recover the cost of minor rectification works while on site, to avoid a costly return visit after site defects have subsequently been rectified by the customer (as we also highlight in our response to 3.3.1). For example, recovering the cost of installing backing boards to avoid the need to replace non-friable asbestos or timber mounted switchboards. • clarifying how the following situation is to be managed: (1) a legacy meter malfunctions, (2) the customer's installation has defects that are not safety-related but must be rectified to install a new meter, and (3) the customer refuses to rectify the defects. On this last bullet point, we refer the AEMC to our comments to section 3.5.1, specifically related to not requiring customers to remediate site defects. We recognise that complementary measures to assist customers with defective switchboards are outside the scope of the AEMC's rule change process. Nevertheless, ongoing uncertainty on this matter impacts a retailer's ability to plan and remain compliant, particularly given the strong penalty regime proposed. As such, we recommend the AEMC take the opportunity in its final determination to address this ongoing challenge. This raises the importance of maintaining up-to-date and correct NMI Standing Data which is essential for efficient and safe operations, and which the relevant parties require to comply with their increasingly strict obligations. There is a case for placing an obligation on all relevant participants to maintain NMI Standing Data and, where appropriate and in accordance with the rules, to provide through MSATS other available data relevant to meeting participants' obligations.

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	Retailer planned interruptions Our retailer, EEQ, notes that the draft determination does not propose changes to the retailer planned interruption process despite changes to other retailer-customer communications. We note that these provisions were amended in 2019 with the intent of reducing delays to the installation of smart meters. At that time the intent was to give customers more control over the installation process and the provisions were drafted in such a way that assumes the retailer will contact the customer to negotiate an agreeable time for the installation. If unsuccessful, the retailer will then send a notice to the customer for a retailer planned interruption. However, these provisions are now causing delays to the accelerated deployment of smart meters. Given the greater scale and complexity of the task to replace the remaining 60-plus per cent of meters in five years (noting around 30 per cent were installed in the six and a half years since December 2017), and the challenges of scheduling installer resources in regional locations, we recommend that retailers be permitted additional scope to schedule retailer planned interruptions to occur within a multi-day window without requiring prior customer consent, but with customers retaining the right to request the interruption to occur on another date if more convenient. This approach would enable additional flexibility for retailers and MCs to adapt their installation schedules in the accelerated deployment on a day-to-day basis to accommodate instances where customers' premises are not ready, access is not provided, or customers cannot be without power (for example, when working from home). More importantly, this approach would improve the efficiency of the deployment process by avoiding wasted visits to customer premises and the need for retailers to delay the installation by at least a week to enable the issue of a new retailer planned interruption notice with a minimum four business day notice period, with flow on effects for future planned work schedules and other customer notifications. We suggest that this approach strikes the appropriate balance between the AEMC's policy position that customers should not have their electricity supply interrupted without notice and the practical implementation issues of an accelerated deployment program which includes keeping metering implementation costs as low as possible.

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3.5.3 The draft rule would introduce a coordinated approach to meter upgrades in shared fuse scenarios	<u>More details on the procedure are needed</u> Energy Queensland notes that the proposed shared fusing meter replacement procedure appears to be very high level and is missing key details required by participants for implementation. The shared fusing meter replacement procedure will require retailers to notify the DNSP that a site has shared fusing, and DNSPs are required to communicate this with retailers. The AEMC should clarify how these notifications will be delivered and proposed communications arrangements. Given MCs are currently required to send a B2B notification to the DNSP, it is unclear why the new process places this obligation on the retailer, effectively duplicating and adding an additional step. The existing process—where the MC sends a shared fusing site notification (SFN) to the DNSP and retailer, and the DNSP updates the MSATS standing data and then uses the SFN to trigger the shared fusing meter replacement process—is more direct and would avoid an unnecessary step. We recommend the existing processes for updating MSATS standing data be clarified, including the obligations on different market participants. Since the proposed rule change will enable the DNSP to recover their costs to plan and action the shared fusing exchanges from the effected retailers, the MC notification could be used to trigger the process without the need for the additional notification from a retailer. We note that the proposed procedure does not appear to oblige the retailer or the DNSP to send a planned interruption notice of the type required under NERR clause 59C and NERR clause 90. The AEMC should clarify the obligations on retailers to communicate with affected customers in advance of the meter exchange, particularly regarding the interruption. <u>Timing of works</u> We also note that the proposed procedure refers to a date and time and does not appear to take account of customers with special requirements, such as customers with life support equipment and business customers for whom mandating the proposed timing of the group interruption is not appropriate or may not be agreed by the customer. Another important aspect for the AEMC to consider is how works at these sites would be scheduled throughout the LMRP. The final determination should ensure such requests are not submitted in bulk at the start of a calendar

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	month or year, leading to potential resourcing issues when attempting to meet the associated high peaks and low troughs in the flow of jobs. Enabling MCs to undertake NMI Standing Data searches We believe the ability for MCs to be able to undertake NMI Standing Data searches via NMI Discovery, as highlighted in the AEMC's Metering Services Review final report[6] as per the proponent rule change request's drafting instruction 10 related to Rule provision 7.15.5,[7]and as highlighted in the discussions of the B2B/MSR WG, would greatly improve efficiencies and effectiveness in several current BAU activities in the meter installation process. In addition to existing business-as-usual use cases for MC NMI Discovery, this could also support efficiencies in the One-in All-in and Defect Notification processes included in the draft rule.
3.5.4 The draft rule would establish a process to encourage customers to remediate and allow retailers to track site defects	The AEMC notes a site defect notification and tracking process would support the efficient deployment of more smart meters. However, the AEMC should also consider the following: • Including a 'defect type' indicator in MSATS as per the recommendation in the Metering Services Review final report,[8] the drafting instructions[9] and discussions in the B2B/MSR WG, as opposed to a flag that only indicates the presence of a defect. A defect type indicator would provide relevant participants with information on the nature of the defect without needing additional B2B procedural processes (and costs) to manage the transfer of this detail.

[6] https://www.aemc.gov.au/sites/default/files/2023-08/emo0040_-_metering_review_-_final_report.pdf, page 108.
[7] https://www.aemc.gov.au/sites/default/files/2023-10/Accelerating%20smart%20meter%20deployment%20%E2%80%93%20Rule%20Change%20Request.pdf, page 26.
[8] https://www.aemc.gov.au/sites/default/files/2023-08/emo0040_-_metering_review_-_final_report.pdf, page 93.
[9] https://www.aemc.gov.au/sites/default/files/2023-10/Accelerating%20smart%20meter%20deployment%20%E2%80%93%20Rule%20Change%20Request.pdf, page 24.

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	• The draft determination's requirement for retailers to record dates for multiple customer notices in MSATS is an overly complicated process that will add costly market and participant system changes whilst delivering little benefit to customers. A simpler procedural obligation on retailers to issue and manage customer defect notifications via the related systems, triggered from the date the MC advises the market of the defect (with MSATS updated with the defect type flag), may deliver a better cost benefit proposition for the industry. • The impacts of defects on the One-in All-in process for multi-occupancy situations, where the identification of a defect preventing a single meter installation would also prevent the installation of meters for all customers under the shared fuse (for example, as a result of a non-compliant panel). We recommend that the defect type flag in these situations is applied to all impacted NMIs, which would notify other relevant participants of the defect and create further efficiencies and reduce costs. This approach will provide market participants with greater visibility on the status of the site, including on customer churn, and support the proposed mandatory replacement requirements.
3.6.1 The draft rule would tailor testing and inspection requirements for legacy meters during the LMRP period	The AEMC noted the draft rule would temporarily exempt MCs from testing and inspecting legacy meters. Energy Queensland supports the proposal to exempt legacy meters from testing and inspection to increase efficiencies. In addition, it will be important for the AEMC to clarify: • how this would function for meters that cannot be reasonably replaced within the LMRP due to external factors; and • whether any meters remaining in-service after 2030 would be retained under DNSP ownership, or if these would be transitioned to a nominated provider (like the retailer of last resort process). This second bullet point raises a range of longer-term issues post 2030 that the AEMC could consider, with some examples including the ownership of remaining meters, responsibility for site defect processes and application of any charges that have been prohibited during the 2025-2030 period.

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Appendix C: Legal requirements to make a rule	
C.5 Civil penalty provisions and conduct provisions	The AEMC's draft determination proposes to apply tier 1 civil penalties to instances of non-compliance with LRMPs. Tier 1 civil penalties are typically reserved for breaches of the most serious nature, such as those which pose a serious risk to life. Energy Queensland questions the appropriateness of applying tier 1 penalties to breaches where there is no threat to life or physical harm.
Appendix D: Summary of the draft rule	
D.1 Commencement of the draft rules	For the AEMC's proposed shared fusing meter replacement procedure start date, achieving a January 2025 'go live' would require the relevant participants to have completed all consultation, design/build/test and deployment activities by the end November 2024 due to shutdowns over the Christmas and New Year period, and the increased operational pace associated with the summer storm and cyclone season. However, AEMO has flagged that it will not have the relevant procedure—from which the participants will need to base their preparations—published until late November 2024.[10] For the proposed amendments to the rules regarding PQD, we support the AEMC's start date of 26 June 2025. It is imperative that DNSPs gain access to near real time PQD as soon as possible. This will enable DNSPs to detect network issues such as faults and lines down that may impact public safety, to improve power quality and outage responses, and (when used in combination with dynamic connections) to maximise the use of network assets to support very high penetrations of distributed energy resources. Notwithstanding, we recognise the importance of other participant system readiness and relatedly the need for basic PQD to be defined in time to support this.

[10] https://aemo.com.au/-/media/files/initiatives/metering-services-review/metering-services-review---draft-high-level-implementation-assessment.pdf?la=en, page 25.