



# **AEMC METER REPLACEMENT PROCESSES: CONSULTATION PAPER**

ENA submission: 2 July 2015

## CONTENTS

Executive Summary .....	1
Recommendations .....	1
Introduction .....	2
Background.....	2
Key issues .....	3
Implementation and transaction costs .....	5
Conclusion.....	6
ENA Recommendations.....	6
Appendix 1: ENA responses to AEMC Questions .....	7

## EXECUTIVE SUMMARY

The rule change proposal and AEMC consultation paper consider process and timing complexities relating to the transfer of customers between retailers which may result in changing out the customer's meter ('meter churn').

The meter replacement process currently relates mostly to retail processes on meter churn that affect large customers with type 1-4 meters. However, with the introduction of metering competition, this issue will increasingly impact upon small customers also.

There is significant complexity in the timing of the meter replacement rule change, including interaction with the metering contestability rule change and current changes to the *AEMO meter churn procedures* (and related systems changes) in progress now to implement by 1 September 2015.

ENA is sympathetic to the issues raised by ERM Power in identifying practical issues relating to managing customer experience in change over of retailers and products which result in the need for meter churn.

However, ENA considers that the solution proposed by ERM Power involves a level of complexity and uncertainty in roles, responsibilities, obligations, service delivery, compliance and penalties that does not ensure a better outcome for customers.

The overall focus on retailer service for customers results in an inadequate consideration on the impact of the proposal on service obligations and delivery by other parties, which will also adversely impact customer experience.

ENA endorses the conclusion reached by AEMO that there are clear directions within the NER that meter exchange must await completion of the retail transfer process.

ENA supports the view that under the procedure as it has operated (enabling early change-out of meters), the allocation of obligations does not sit with the party responsible for the role and service.

This places the incumbent parties at risk of non-compliance with their responsibilities with no effective ability to influence service delivery to dependent parties, including the customer and network.

ENA believes that the intent and direction in the NER to delay meter exchange until retail transfer is finalised should be maintained.

Where large customers are concerned, ENA believes that it may be worthwhile considering allowing market

participants to reach commercial agreements to support early transfer, when this is agreed between all parties.

ENA notes that the procedures to be introduced in September align roles and responsibilities directly to the relevant party at each point in time. This will also provide the clearest and most effective incentive for efficient transfer of equipment to support new service delivery, as it is in the interest of the 'new' retailer and parties to have this in place as soon as possible.

In the context of expansion of metering contestability for small customers, the practical implementation of service delivery to customers and other parties are yet to be finalised. This involves clarification of the framework for access to data and services and how network devices may be used as alternatives for network services.

Given that additional complexity soon to commence with the metering contestability rule change, both regarding processes and roles of parties, the additional complexity from four new 'prospective' roles to be added at this time is not supported by the ENA.

## RECOMMENDATIONS

ENA recommends:

1. That the AEMC **reject** the rule change request on meter replacement processes.
2. That the AEMO meter churn procedure be implemented by 1 September 2015.
3. However, if AEMC decides that changes to meter replacement processes are required, they should be aligned with the Expanded Competition in Metering Rule change even if that means delaying the effective date of either Rule change.
4. AEMC may investigate the ability to change the NER to enable commercial agreements between retailers to allow early exchanges of meters (eg include phrase like, "unless agreed between the parties") for large customers rather than instituting a major and complex change of roles which may not be required in the future.

## INTRODUCTION

The ENA is the national industry association representing the businesses operating Australia's electricity transmission and distribution and gas distribution networks. Member businesses provide energy to virtually every household and business in Australia. ENA members own assets valued at over \$100 billion in energy network infrastructure.

ENA welcomes the opportunity to make a submission on the Australian Energy Market Commission's (AEMC) consultation paper on meter replacement processes.

## BACKGROUND

The rule change proposal and AEMC consultation paper consider process and timing complexities relating to the transfer of customers between retailers which may result in changing out the customer's meter ('meter churn').

In 2013 The Australian Energy Market Operator (AEMO) reviewed their *Meter Churn Data Management Procedure* and *Meter Churn Procedure for FRMPs* and identified inconsistencies between the National Electricity Rules (NER) and the *Meter Churn Procedure*. AEMO considered that:

- » the *Meter Churn Procedure* described a series of obligations that facilitate a process to allow a Financially Responsible Market Participant (FRMP), who is not the Responsible Person (RP) for the metering installation or the FRMP for the market load in AEMO Market Settlements and Transfer Solutions (MSATS), to instigate a replacement of metering devices at a metering installation; while
- » other NER clauses 7.2.1 and 7.3.4 (i) and (m) stated that metering installations must not be altered by the FRMP until the retail transfer has been effected by AEMO.

The early churn of meters leaves incumbent service providers exposed, due to their inability to fulfil their data and regulatory obligations when their equipment has been removed while their service obligations remain.

Consequently, AEMO amended the *Meter Churn Procedure for FRMPs* to bring it into line with the NER. The amended procedure will come into effect on 1 September 2015<sup>1</sup>.

ERM Power is seeking a rule change to alter the NER to validate past practice, to enable change of meters by a 'new/incoming' retailer at the connection point before the finalisation of the retail transfer.

The ERM Power proposal involves identification of four new 'prospective' roles and associated responsibilities to cover services delivery by the new/incoming retailer and their selected service providers (RP/Metering Coordinator (MC), Metering Provider (MP) and Metering Data Provider (MDP)). ERM Power argues that this would enable introduction of new products immediately upon change of retailer, involving more clarity for the customer and that, as now, the 'new' retailer would carry the risk if the transfer was not undertaken (eg due to successful challenge by incumbent retailer).

The meter replacement process currently relates mostly to retail processes on meter churn that affect large customers with type 1-4 meters. However, with the introduction of metering competition, this issue will increasingly impact upon small customers also.

There is significant complexity in the timing of the meter replacement rule change, including interaction with the metering contestability rule change and current changes to the *AEMO meter churn procedures* (and related systems changes) in progress now to implement by 1 September 2015.

The ENA submission to the AEMC draft determination on expanding contestability for metering and related services<sup>2</sup> provides comprehensive coverage of practical issues to be resolved in the expansion of competition to the small customer market. Many of these issues will be relevant in the context of meter replacement processes generally. ENA will touch upon some examples in this submission, but refers AEMC to our earlier submission for comprehensive review.

ENA is sympathetic to the issues raised by ERM Power in identifying practical issues relating to managing customer experience in change over of retailers and products which result in the need for meter churn.

However, ENA considers that the solution proposed by ERM Power involves a level of complexity and uncertainty in roles, responsibilities, obligations, service delivery, compliance and penalties that does not ensure a better outcome for customers.

The overall focus on retailer service for customers results in an inadequate consideration on the impact of the proposal on service obligations and delivery by other parties, which will also adversely impact customer experience.

---

<sup>1</sup> AEMC National Electricity Amendment (Meter Replacement Processes) Rule 2015: Consultation Paper, 21 May 2015, p. 7

---

<sup>2</sup> ENA submission to AEMC draft determination on competition in metering and related services, 26 May 2015

## KEY ISSUES

AEMC frames consideration of the proposal against the National Electricity Objective, taking into account:

- » Materiality of the problem;
- » Customer engagement and customer satisfaction;
- » Efficiency in market for metering services;
- » Regulatory transparency and certainty; and
- » Implementation process and transaction costs.

The ENA response follows this framework.

### Materiality of the problem

AEMC initially seeks to identify if there is a problem of inconsistency within the NER and if this problem is 'material', requiring resolution.

ENA endorses the conclusion reached by AEMO that there are clear directions within the NER that meter exchange must await completion of the retail transfer process.

ENA supports the view that under the procedure as it has operated (enabling early change-out of meters), the allocation of obligations does not sit with the party responsible for the role and service. For example, under the current procedure an incoming MP has the ability to change the metering installation at the point in time that the incumbent MP is still responsible under the NER for the maintenance and operation of the metering installation at the connection point<sup>3</sup> and delivery of services.

This places the incumbent parties at risk of non-compliance with their responsibilities with no effective ability to influence service delivery to dependent parties, including the customer and network.

ENA believes that the intent and direction in the NER to delay meter exchange until retail transfer is finalised should be maintained.

Where large customers are concerned, ENA believes that it may be worthwhile considering allowing market participants to reach commercial agreements to support early transfer, when this is agreed between all parties.

---

<sup>3</sup> Ibid, p. 18

### Customer engagement and satisfaction

The AEMC consultation paper notes the intent of the proposed ERM Power proposal to improve customer experience by enabling effective service delivery by the incoming FRMP and associated parties immediately upon retail transfer. However, they also note the reality that in some cases retail transfer may not be completed, with the effect that the incumbent parties' equipment has been removed but their responsibility remains on-going and equipment must then be restored and reactivated<sup>4</sup>. This entails cost, inconvenience and service interruption.

While this issue may be manageable within the context of service to large customers with the capacity and resources to manage transitions and problems, it has potential for disruptive impact on small customers when the metering contestability rule change results in increasing meter churn experiences for small residential and business customers.

Under the metering contestability rule change, Metering Coordinators are not required to provide even minimal services to other parties in the NEM unless they reach a commercial agreement. It also includes the ability for networks to retain devices (which may be their meter) to provide network services, especially in the context of inability to obtain economic and/or reliable service delivery from the Metering Coordinators.

The clarification of roles and responsibilities within the metering contestability rule change has yet to be completed, with considerable complexity and practical resolution of implementation processes to be clarified to ensure positive outcomes in service delivery and customer experience.

ENA considers that introducing multiple 'prospective' roles via a meter replacement process rule change into the major transformation process underway to provide competitive metering and related service delivery for small customers is likely to significantly delay, if not reduce, the likelihood of effective and efficient outcomes to benefit all parties, including the customer.

As noted previously noted, ENA considers that there may be value in enabling market participants to reach commercial agreements to support early meter exchange for large customers, but the processes and application to expand service delivery to smaller customers in the NEM under the metering contestability rule change should be completed before introduction of additional complexity into that market.

---

<sup>4</sup> Ibid, p. 19

## Efficiency in the market for metering services

ENA has already noted the need to review the potential changes to the meter replacement processes in the context of the metering contestability rule change process, including the need for clarity and surety in application and implementation of roles and responsibilities in service delivery. That assessment is relevant also in consideration of efficiency in the market for metering services.

In addition to issues relating to service delivery and utilisation of network devices referenced earlier, ENA considers there will be practical implementation problems with early churn processes relating to access to data.

The metering contestability rule change considers how parties can access metering related data. These processes are still to be clarified to ensure that all parties receive the data essential to perform their duties and responsibilities. The inclusion of four 'prospective' roles seeking access to data within this process, whether by right or by commercial agreement, will be difficult to delineate and manage, especially in the context of privacy of customer data.

Even within the current procedure enabling early meter churn, prospective metering providers do not have access to NMI standing data in AEMO MSATS system and are not registered in the market. Direct provision of data requested by prospective MPs may be sought from incumbent parties, but this involves contacts by phone or email and verification processes to ensure legitimacy of right of access to the data, based upon customer consent.

When early access to data applies to a limited number of large parties, the process may be manageable by informal processes. Expansion of such demands across small customers will challenge resource availability and efficiency in delivery.

By contrast, rights of access to data and service are direct and clear in routine MSATS processes under the AEMO procedures which come into effect in September 2015. The clarity of roles and associated access rights under the AEMO procedure provides the most efficient resolution to data access.

AEMC notes potential resolution of service delivery issues for incoming retailers:

*The arrangements for meter churn in the NEM have implications for efficiency and competition in the market for metering services. For example, not allowing meter churn to occur until after the retail transfer has been completed may result in a situation where the incoming retailer is forced to*

*engage with the incumbent MP and MDP at the relevant connection point.*

*There may be a number of actions that the incoming retailer could take where it cannot change the metering parties at a connection point (in addition to those described in ERM Power's proposal). Such examples include:*

- *the incoming retailer entering into arrangements with incumbent metering parties to allow changing of the metering installations before the conclusion of the retail transfer period; or*
- *the incoming retailer entering into a short-term arrangement with the customer to undertake energy supply using the existing metering installation at the connection point (e.g. entering into a flat tariff contract for the period of time between becoming the FRMP and when the new meter is installed).<sup>5</sup>*

ENA endorses the AEMC view that the process for transfer of retail and related responsibilities may be managed via commercial agreements and/or improvements in process delivery.

ENA also notes that the procedures to be introduced in September align roles and responsibilities directly to the relevant party at each point in time. This will also provide the clearest and most effective incentive for efficient transfer of equipment to support new service delivery, as it is in the interest of the 'new' retailer and parties to have this in place as soon as possible.

## Regulatory transparency and certainty

The ERM Power rule change proposal seeks to ensure regulatory transparency and certainty in an early meter replacement process before retail transfer. However, as noted earlier, the proposed solution involves establishment of four additional 'prospective' roles in the market mirroring the parties engaged in metering installation, data and service delivery.

AEMC accurately summarises the complexity inherent in the ERM Power proposal

*The proposed rule changes from ERM Power would create a number of prospective metering roles ... These prospective roles would each have certain rights and obligations e.g. the prospective MP would have the right to commence the replacement of a metering installation before the retail transfer process is completed.*

---

<sup>5</sup> Ibid, p.20

*Under the rule change request, these **prospective roles would have some rights and obligations** at the connection point, while the **incumbent parties would still have overall responsibility**.*

*The AEMC notes that **if prospective metering roles were to be created, the division of obligations between the prospective roles and incumbent would need to be clear to all parties**. It would be necessary to lay out the full list of rights and obligations of all parties during each step of the meter churn process, in either the NER or the procedures.*

*More generally any process, including any alternative options that may be proposed, of allowing metering roles to change during retail transfer would **require specification of each party's rights and obligations at all stages of the process**.*<sup>6</sup> [emphasis added]

In the view of the ENA, the requirement to specify all aspects of rights and obligations for an additional four roles in the market, where these responsibilities will change at various parts of a process of meter change that is likely to become increasingly prevalent in the small customer market will constitute a complex and costly resolution to a perceived problem.

While the ENA recognises that the proposed changes to AEMO procedures may cause some challenges for retailers, the clarity and simplicity included within the AEMO procedures due to commence on 1 September 2015 provide surety for customers, LNSPs and others on who is responsible at what time for any changes to the metering installation.

As noted previously, in the context of expansion of metering contestability for small customers, the practical implementation of service delivery to customers and other parties are yet to be finalised. This involves clarification of the framework for access to data and services and how network devices may be used as alternatives for network services.

Given that additional complexity soon to commence with the metering contestability rule change, both regarding processes and roles of parties, the additional complexity from 'prospective' FRMP, RP/MC, MP and MDP roles to be added at this time is not supported by the ENA.

ENA notes that slow meter replacement processes may be a transitional issue, which may itself be significantly resolved through the metering rule change. Although the issue may arise in initial transfers due to delays in final meter readings (as in the current process, unless a special read is commissioned and paid for, as meters churn to advanced meters, the customer transfer process is expected to speed up significantly with potential for remote re-energisation and de-energisation (although the details on the process have yet to be finalised). This may lead to the outcome reported in New Zealand that actual change outs typically take only one to two days post transfer<sup>7</sup>.

## IMPLEMENTATION AND TRANSACTION COSTS

The AEMC consultation paper notes the complexities relating to timing and interaction of the proposed meter replacement processes rule change, the metering contestability rule change and the associated procedural changes that will be required to implement these changes.

ENA considers that the highest priority should be directed to successful resolution and introduction of effective and efficient changes relating to the metering contestability rule change.

The final determination on metering contestability was scheduled to be delivered on 2 July 2015.

Due to the challenging complexity of comprehensive changes to roles and responsibilities under metering contestability, and the resulting concern to ensure efficient outcomes and delivery of services to small customers, the final determination for the metering contestability for small customers has been delayed.

The commitment of many parties to effective delivery of the metering contestability rule change has been consistently very high, due to the critical importance of ensuring that these changes operate effectively for all parties, especially customers.

Adding additional complexity to that process by delineation of additional roles in the market is most likely to further delay delivery of the metering contestability final determination.

ENA considers that priority of all parties should be maintained upon delivery of the contestability of metering for small customers.

---

<sup>6</sup> Ibid p. 22

---

<sup>7</sup> Ibid, p.20

## CONCLUSION

ENA considers that the proposed meter replacement processes rule change should be rejected.

Most notably for the ENA, the assessment both within the ERM Power rule change request and the AEMC consultation paper only directly address the interests of customers and retailers. Both analyses are silent on possible impacts on third parties such as LNSPs and third party service providers.

As noted by AEMC, the ERM Power rule change request predated the metering contestability draft determination and draft rule and does not address the added complexities incumbent in that process.

Most notable issues of concern for the ENA are:

- » **Surety of roles and responsibilities:** While it is recognised that the proposed changes to AEMO procedures may cause complications for retailers, the clarity and simplicity included within the AEMO procedures due to commence on 1 September 2015 provide surety for parties on who is responsible at what time for any changes to the metering installation. Given that additional complexity soon to commence with the metering contestability rule change, both regarding processes and roles of parties, it would add a further level of complexity to relationships and responsibilities for additional roles of 'prospective' FRMP, RP/MC, MP and MDP to be added.
- » **Current metering contestability rule change:** the current metering contestability rule change is identifying significant complexities in operational detail. Addition of four new roles in the market at this time will make a complex system much worse.
- » **Resourcing:** ENA notes the current resourcing challenges for AEMC, AEMO and all stakeholders due to the extensive range of issues and processes underway at present. ENA considers that priority should be given to finalising the metering contestability rule change and associated processes and procedures.
- » **Compromise:** AEMC may investigate the ability to change the NER to enable commercial agreements between retailers to allow early exchanges of meters (eg include phrase like, "unless agreed between the parties") for large customers, rather than instituting a major and complex change of roles which may not be required in the future.

## ENA RECOMMENDATIONS

ENA recommends:

1. That the AEMC **reject** the rule change request on meter replacement processes, due to the reasons outlined above.
2. That the AEMO meter churn procedure be implemented by 1 September 2015.
3. However, if AEMC decides that changes to meter replacement processes are required, they should be aligned with the Expanded Competition in Metering Rule change even if that means delaying the effective date of either Rule change.
4. AEMC may investigate the ability to change the NER to enable commercial agreements between retailers to allow early exchanges of meters (eg include phrase like, "unless agreed between the parties") for large customers rather than instituting a major and complex change of roles which may not be required in the future.

## APPENDIX 1: ENA RESPONSES TO AEMC QUESTIONS

Qu. No.	Question	ENA response
1.	<p><b>Materiality of the problem</b></p> <p>a) Do stakeholders agree that there is lack of clarity in the NER on this issue</p> <p>b) Given the specifications of the NER, current and amended AEMO procedures, do stakeholders consider that there are concerns about when meter replacements can occur in relation to the retail transfer process?</p>	<p>a) ENA supports the AEMO view that there is clarity in the NER clauses 7.2.1 and 7.3.4 i) and m) that state that metering installations must not be altered by the FRMP until the retail transfer has been effected by AEMO.</p> <p>b) ENA endorses the introduction of the AEMO meter churn procedures which come into force on 1 September 2015 to ensure industry practice aligns with the NER. Meter churn should be undertaken only after finalisation of the retail transfer process</p> <p>While the application of early meter churn practices to date has been mainly focused within services to large customers, the introduction of contestability in metering provision for small customers will mean the application of meter churn processes will affect many more customers in the near future.</p> <p>Priority should be placed upon ensuring clarity and efficiency in roles and responsibilities and related procedures for all customers within the metering contestability determination process.</p> <p>ENA notes that consideration is still underway within the metering contestability rule change process relating to access to and delivery of metering and related services to parties including networks. Service delivery to networks may be impacted by the willingness or ability of a new metering service provider to continue to provide services which had been contracted with the incumbent parties.</p> <p>In particular, how early meter exchange could impact upon the right of the network to negotiate service continuing and/or to retain a network device (which may be their meter) would be made more difficult by early equipment exchange. Consideration of this issue should await clarity within the metering contestability rule change process underway.</p>

Qu. No.	Question	ENA response
2.	<p><b>Consumer engagement and satisfaction</b></p> <p>(a) What are stakeholders' experiences, in particular, consumers' experiences, of being able to change the metering installation prior to the retail transfer being completed (i.e. under the current procedure)?</p> <p>(b) Do stakeholders consider that it would be beneficial to consumers and retailers for metering installations to be able to be altered before or on the day of a retail transfer?</p> <p>(c) What are the likely outcomes for consumers in situations where retailers are unable to change the metering installation for consumers during the retail transfer period (ie under the amended procedure)?</p>	<p>a) ENA understands the desire of an incoming retailer to ensure all systems, support roles and equipment is in place to enable seamless application of retail products on transfer of customers. However this does not take into account the related difficulties and compliance risk placed upon incumbent roles (FRMP, MC/RP, MP and MDP) on delivery of their required, contracted services after their equipment has been removed but before their obligations cease on finalisation of the retail transfer. This includes to provision of metering data, meter compliance, management of the customer interface relating to interruptions to service, etc.</p> <p>b) See point above. ENA would support metering installations being able to be exchanged on or soon after the day of retail transfer, as the formal roles and responsibilities in the market transferred.</p> <p>c) ENA considers that the obligation rests with the retailer to ensure customer comprehension of the process and timing of retail transfer and the exchange of equipment, where this is required. This should be part of the customer information process. With introduction of the metering contestability framework, it is arguable that after initial exchange of a type 5/6 meter for an advanced meter, further meter churn for small customers may be limited and service transfer is likely to be significantly streamlined.</p>
3.	<p><b>Efficiency in the market for metering services</b></p> <p>(a) Do stakeholders consider the other possible actions identified above are feasible for retailers to use where they cannot change the metering</p>	<p>a) The AEMC identifies the potential for agreements between the incoming retailer and incumbent metering parties to enable early changing of metering installations, or clarity of arrangements with their new customer on how products may be supplied in the short time before meter change. ENA endorses the availability of options such as these for <b>large customers</b> to enable early exchange or clarity in impact of equipment change on</p>

Qu. No.	Question	ENA response
	<p>installation until the retail transfer is complete? Are there any alternatives?</p> <p>(b) Do stakeholders consider there are issues that should be taken into account relating to the allocation of responsibilities where parties can change a metering installation before the retail transfer is complete?</p> <p>(c) What are the implications on efficiency in metering services for:</p> <p>(i) being allowed to change the metering installation on and/or prior to a retail transfer completing; and</p> <p>(ii) being allowed to change the metering installation only after the retail transfer completes.</p> <p>(d) What do stakeholders consider would be the impact of the introduction of prospective parties on the metering services market?</p>	<p>customers, provided that such options ensure delivery of all contracted services and recognition of all existing obligations. In addition, AEMO advised verbally at the AEMC workshop on this topic on 16 June 2015 that AEMO has been directed to review objections period provisions. This may also result in shorter change out times. ENA does not support expansion of such options to small customers.</p> <p>b) ENA has already noted the need to review the potential changes to the meter replacement processes in the context of the metering contestability rule change process, including the need for clarity and surety in application and implementation of roles and responsibilities in service delivery. That assessment is relevant also in consideration of efficiency in the market for metering services. In addition to issues relating to service delivery and utilisation of network devices referenced earlier, ENA considers there will be practical implementation problems with early churn processes relating to access to data.</p> <p>The metering contestability rule change considers how parties can access metering related data. These processes are still to be clarified to ensure that all parties receive the data essential to perform their duties and responsibilities. The inclusion of four 'prospective' roles seeking access to data within this process, whether by right or by commercial agreement, will be difficult to delineate and manage, especially in the context of privacy of customer data.</p> <p>d) In the view of the ENA, the requirement to specify all aspects of rights and obligations for an additional four roles in the market, where these responsibilities will change at various parts of a process of meter change that is likely to become increasingly prevalent in the small customer market will constitute a complex and costly resolution to a perceived problem.</p> <p>While the ENA recognises that the proposed changes to AEMO procedures may cause some challenges for retailers, the clarity and simplicity included within the AEMO procedures due to commence on 1 September 2015 provide surety for customers, LNSPs and others on who is responsible at what time for any changes to the metering installation.</p>

Qu. No.	Question	ENA response
	<p>(e) Do stakeholders consider the issues raised by ERM Power could be resolved through the introduction of obligations relating to transfer dates and bilateral agreements between incoming and incumbent parties?</p>	<p>As noted previously, in the context of expansion of metering contestability for small customers, the practical implementation of service delivery to customers and other parties are yet to be finalised. This involves clarification of the framework for access to data and services and how network devices may be used as alternatives for network services.</p> <p>Given that additional complexity soon to commence with the metering contestability rule change, both regarding processes and roles of parties, the additional complexity from 'prospective' FRMP, RP/MC, MP and MDP roles to be added at this time is not supported by the ENA.</p> <p>e) ENA considers that instruments such as bilateral agreements may be appropriate to consider to support services and equipment change for large customers. ENA considers that the roles and responsibilities for service delivery to small customers remain to be clarified within the metering contestability process. Meter replacement for small customers (at least) should remain as delineated within the AEMO procedures to come into place in September 2015</p>
4.	<p><b>Regulatory transparency and certainty</b></p> <p>(a) Would the implementation of prospective roles provide a sufficient mechanism for facilitating the replacement of metering installations at a connection point before a retail transfer is complete?</p> <p>(b) If these were introduced, what</p>	<p>a) No. See above</p> <p>b) ENA does not support introduction of prospective roles.</p>

Qu. No.	Question	ENA response
	<p>specific obligations and rights do stakeholders consider would best be allocated to the prospective metering roles? What obligations and rights would need to be maintained with the incumbent roles?</p> <p>(c) Would clarity be increased for participants and consumers if the meter churn process was made separate from the retail churn process as has been proposed?</p> <p>(d) Where incoming metering parties have rights and obligations, how do stakeholders consider these should be set out as part of the regulatory framework?</p>	<p>c) No</p> <p>d) ENA considers that rights and obligations should be as delineated in the NER and the AEMO meter churn procedures to come into effect in September 2015</p>
5.	<p><b>Implementation of any rule change and transaction costs</b></p> <p>a) If this rule were to be made, should the commencement coincide with the planned commencement of the expanding competition in metering and related services final rule expected in July 2017?</p>	<p>a) ENA does not support the meter replacement rule change and believes that it should be rejected.</p>

Qu. No.	Question	ENA response
	<p>b) If this rule was to commence in July 2017, would there be a need for a transitional rule to be made to take effect between the publication of the final rule and when the expanding competition in metering and related services rule comes into force?</p> <p>c) What are the expected costs for stakeholders associated with any system changes resulting from changes to the meter replacement process?</p>	<p>b) See above</p> <p>c) System costs have not been estimated as ENA believes the rule change should be rejected on principle.</p>
6.	<p>Other issues</p> <p>a) Do stakeholders consider that there are other potential regulatory solutions that could be followed to resolve the issues raised by the proponent?</p> <p>b) Do stakeholders consider that there are any additional issues that would be relevant to the Commission's decision on this rule change request?</p>	<p>a) ENA believes that some issues may be resolved within the metering contestability rule change, if this results in expected increased efficiencies. ENA also believes that it may be worthwhile to consider some flexibility for large customers to make commercial agreements to support early meter churn.</p> <p>b) As noted in this submission, ENA considers that the assessment by the AEMC has substantially focused upon the impact upon retailers, without taking adequate account of the impacts upon other market participants.</p>