

## **Ausgrid Submission**

AEMC Meter Coordinator planned interruptions rule change

Draft report

February 2020





13 February 2020

Attn: Ms Alisa Toomey  
Australian Energy Market Commission  
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Lodged online

Dear Ms Toomey,

Ausgrid is pleased to provide this submission to the Australian Energy Market Commission's (AEMC) Introduction of Metering Coordinator Planned Interruptions draft determination. We welcome any recommendations that lead to improved customer outcomes in the provision of metering services while ensuring that appropriate safety and consumer protections are in place.

Our submission provides views on a number of issues raised in the AEMC's draft determination. Importantly, given the process and system changes that will be required, we consider that transitional arrangements are required to facilitate an orderly introduction of the new arrangements.

Should the AEMC have any questions in relation to this submission, please contact John Skinner, Regulatory Policy Manager on 02 9269 4357 or [john.skinner@ausgrid.com.au](mailto:john.skinner@ausgrid.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to read "Iftekhar Omar", written in a cursive style.

Iftekhar Omar  
Head of Regulation

# Submission

A positive customer experience is key to the successful introduction of new metering products and services across NSW. The introduction of metering contestability has created complexities that are adding costs to the supply of meters, costs that will ultimately be paid for by customers. We welcome any new arrangements that will help improve the customer experience whilst maintaining appropriate consumer protections.

## Transitional arrangements are required

The AEMC has proposed the date of 26 March 2020 for a commencement of the new rules relating to metering installation timeframes and other information requirements for planned interruptions.

Consistent with the views of other distributors, we consider that transitional arrangements are essential to allow a more orderly commencement of the new rules. For the following reasons, a transitional period of twelve months is appropriate and will allow distributors to meet the new timeframes:

- Both AEMO and distributors will be required to update a number of IT systems and processes to accommodate the proposed new arrangements. For example, AEMO will be required to update MSATS to incorporate shared fuse information and distributors will be required to update their B2B and other systems to provide this information. These changes need to be budgeted and will take time to implement.
- Significant projects such as the implementation of customer switching timeframes, MSATS standing data review, five-minute settlement and global settlement rule changes are already consuming a vast amount of time and resources. In the current environment, implementing another rule change that impacts the B2B and market metering systems will be very challenging.
- Ausgrid's current temporary isolation IT system and subsequent processes are currently based on an extended period (up to 60 business days) upon notification. Pending the outcome of this rule change, we would require a transition to update IT systems and processes and communicate these updates to retailers to meet these tighter timeframes.
- Distributors may experience an initial backlog of planned interruptions for sites with shared fuses. A transitional period will help distributors plan for and remove this backlog.

We would also like to suggest that the requirement for the network to send a shared fuse notification when raising an MFIN B2B service order by the network should be removed as this data would be available in MSATS (once the field has been added).

## Extension to the proposed timeframes

The AEMC's draft rules include a 25-business day timeframe for a distributor to conduct a planned interruption once requested by a retailer. This timeframe will be challenging for distributors to meet given the changes in process that will be required and suggest that this period be increased. A longer time frame would allow for better resourcing for the initial site scoping visit, arranging site access, negotiation and notification of outage dates with the customer and Metering Provider, customer NECF outage notification timeframes and attendance on the day of the outage.

We also propose that the inability of any party to meet a proposed date, thereby requiring the planning process to be recommenced, 'restarts the clock' on the required timeframe. This could be achieved by closing off the current B2B service order and the retailer submitting a new B2B service order.

## Exceptions to the proposed timeframes

There may be other instances, such as family failure meter replacements, that make the 25-business day timeframe challenging.

In our view, the draft rules should have exceptions to the proposed timeframes in a number of circumstances:

- Family failure meter replacements, where there is no customer detriment from replacement over a longer period, compared to an actual meter failure which requires a much shorter timeframe to replace with compliant metering.
- Where distributors receive a glut of requests from multiple retailers and are physically unable to meet the proposed expected timeframes. In these circumstances, distributors should be permitted to agree an alternative time and the timeframe restarted.

## Consent for alternative timeframes

In contrast to the *Metering installation timeframes* rule change, the draft rule does not enable customers to consent to an alternative date for a meter installation when a shared fuse is identified. In our view, customers should be able to agree an alternative meter installation date beyond the proposed time limits with their retailer and distributor. This flexibility is likely to result in a much better customer experience, particularly for business customers. Such an approach will also reduce the risk of non-compliance.

A scenic photograph of a road at sunset. The road is dark and paved, with a white dashed line in the center. On the left side of the road, there are large, dark trees. On the right side, there are more trees and a utility pole with power lines. The sky is a mix of blue and orange, indicating the time is either sunrise or sunset. The overall mood is peaceful and serene.

# Thank you

