

13 February 2020



Alisa Toomey
Australian Energy Market Commission (AEMC)
PO Box A2449
Sydney South NSW 1235

Dear Alisa,

DRAFT RULE DETERMINATION: INTRODUCTION OF METERING COORDINATOR PLANNED INTERRUPTIONS

Endeavour Energy appreciates the opportunity to provide this response to the AEMC's *Introduction of metering coordinator planned interruptions* draft rule determination (the draft rule).

We support the AEMC's decision to not proceed with the proposed rule change to allow Metering Coordinators (MC) to interrupt supply in a shared fuse scenario. Whilst this could reduce delays from multiple site visits, the lack of a direct contractual relationship with MCs means customers would not have adequate customer protections and limited recourse if obligations are not met. It would also increase the risk of supply interruption to life support customers as most MCs have only limited access to the customer information needed to comply with interruption notification requirements.

Instead, the AEMC have made a more preferable draft rule requiring retailers and MCs to install/replace new meters within 30 business days after becoming aware of a shared fuse scenario. To ensure this timeframe is met, DNSPs will be required to plan a supply interruption within 25 business days after receiving the request. The draft rule also requires AEMO to amend their metrology procedures to require retailers and MCs to report information on shared fuse sites to DNSPs who in turn would be required to record this information in MSATS.

We consider the draft rule will reduce metering delays and preserve consumer protections and therefore better balances the metering outcomes for customers receiving the meter against the impact to other customers affected by the supply interruption. We also consider clarifying the ability for retailers to interrupt supply to any of its customers will make it easier to install a meter where all shared fuse customers are supplied by the same retailer.

However, we are concerned that the timeframe to perform a distributor planned interruption may not always be achievable and the proposed commencement date does not allow DNSPs sufficient opportunity to manage existing scheduled outages to achieve compliance with the new timeframe.

Timeframes should be achievable and waived where customers prefer an alternative date.

From our perspective, performing distributor planned outages within the defined timeframe will be challenging and will require changes to outage planning and work scheduling processes to achieve compliance. This would be particularly challenging where family failure meter replacements in shared fuse premises cause a large and unexpected increase in group interruption requests.

If the number of affected meters is high and the opportunities to schedule outages within the timeframe are limited, it may not be possible to accommodate family failure replacements alongside meters with confirmed inaccuracies and customer-initiated meter installations. Given this challenge and the lower value these customers would generally have on a prompt meter replacement relative to customers who actively seek to have a new smart meter installed, we suggest that meter replacements for family failures be an exception to the proposed timeframe. We note it is common for AEMO to provide MCs an exemption from clause 7.8.10(aa) of the NER and allow family failure meters to be replaced over many months. Exempting DNSPs from the proposed timeframe would be consistent with the concession provided to MCs for family failure meter replacements.

Also, in contrast to the *Metering installation timeframes* rule change (December 2018) the draft rule does not enable customers to agree with their retailers on a date (or date range) to have a meter installed when a shared fuse is identified. Without a similar provision shared fuse customers would not be able request installation on a preferred date after the timeframe where the planned supply interruption is inconvenient and cannot be changed without the retailer breaching their obligations.

This provision should also be provided to the DNSP when coordinating an interruption with the metering customer and other impacted customers as it would provide flexibility to perform an interruption on a date preferred by an impacted business customer(s) that would minimise inconvenience or financial losses.

Allowing customers to agree on a date range would not provide affected customers an adequate level of certainty over when their supply will be interrupted. However, we believe allowing customers to negotiate with their retailer and/or DNSP on a specific date after the timeframe would provide a better metering experience at no detrimental cost to affected customers.

Finally, we believe the discrepancy in the timeframe obligations is unnecessary as retailers/MCs would in most instances be able to raise a distributor planned interruption request through B2B on the same day they identify a shared fuse situation and determine a retailer planned interruption cannot be performed. We suggest a consistent 30-day timeframe obligation on retailers, MCs and DNSPs would avoid confusion and be easier to administer from a compliance oversight perspective.

A transitional period is required.

The draft rule indicates the timeframe obligations will commence immediately after the AEMC have made their final rule determination (expected 26 March 2020). In preparation for the final rule change we have amended our work processes to increase the number of planned interruptions we are able to perform. These changes have been effective in delivering a significant reduction in the lead time to complete requested planned interruptions.

Despite these improvements, our forward program of planned interruptions remains congested and we do not expect to sufficiently reduce the backlog of scheduled outages by the commencement date to a level that will allow us to cater for new requests within the timeframe. Our discussions with other distributors indicate many DNSPs are in a similar position and share this concern.

We believe this issue could be best managed by delaying the commencement date until no earlier than three months after the final rule is made. This transitional period would provide DNSPs with a reasonable opportunity to partially clear the backlog of scheduled work so that requests received after the commencement date can be scheduled and completed within the new timeframes.

In relation to the collection and reporting of shared fuse information, we consider the draft rules should include a requirement for MCs to inform DNSPs when they have installed a meter protection device (MPD) at a shared fuse site. This would identify when a previously affected customer is no longer impacted by a group supply interruption and will help ensure the register of shared fuse data remains fit-for-purpose. We also consider shared fuse reporting requirements should be cognisant of the system changes required to facilitate an accurate data register. It would be efficient to make these changes in conjunction with AEMO's MSATS updates for Five Minute Settlement and NEM Customer Switching and defer the commencement of this obligation until this is completed.

If you have any queries or wish to discuss our submission further please contact Jon Hocking, Manager Network Regulation at Endeavour Energy on (02) 9853 4386 or via email at jon.hocking@endeavourenergy.com.au.

Yours sincerely



Rod Howard
Deputy Chief Executive Officer