

29 April 2020



Mr Ed Chan, Director
Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

Dear Ed,

Introduction of metering coordinator planned interruptions rule change

The Public Interest Advocacy Centre (PIAC) is an independent, non-profit legal centre based in New South Wales. Established in 1982, PIAC tackles systemic issues that have a significant impact upon people who are marginalised and facing disadvantage. We ensure basic rights are enjoyed across the community through litigation, public policy development, communication and training. The Energy + Water Consumers' Advocacy Program represents the interests of low-income and other residential consumers, developing policy and advocating in energy and water markets.

PIAC welcomes the opportunity to respond to the Australian Energy Market Commission's (the Commission) consultation on the *Introduction of metering coordinator planned interruptions rule change* (the Rule).

PIAC supports the Commission proceeding with the draft determination, and agree a number of the proposed amendments are likely to improve its practicality. PIAC strongly recommends against proceeding further with the alternative proposal at this time. It goes beyond the scope and intent of the initial proposal and raises a range of complex issues difficult to address.

While we agree that the amended draft determination is not likely to address all the identified shared fusing issues, it presents a practical and workable solution to those highlighted in the rule change proposal. Importantly, it would do so largely by clarifying and adapting the existing framework and maintaining the existing protections.

We note a number of key points in relation to the proposal.

- We agree the amended proposal should provide for the interruption date to be agreed with the customer, as long as those dates are required to sit within the defined timeframes. The defined timeframes should operate as a backstop, providing the protection of certainty to the consumer and an incentive for retailers to resolve the metering issue.

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- We understand there may be exceptional circumstances, such as extreme weather, that may make delivery within the stated timeframes impossible. These should be allowed only if they are genuinely exceptional, not just circumstances that make it 'difficult to deliver' services. We note the timeframes provide up to 6 weeks to coordinate metering work, which is ample time to resolve 'difficult' situations. We contend it is reasonable for consumers to expect rectification in this time.
- Coordination of any additional potential metering work in conjunction with the initial metering replacement should not prevent work being scheduled. It should be possible for the timeframes for the planned outage to be presented as a range (for example between 2-6 hours) so there is an opportunity for works to be coordinated more easily, with a single agreed time period presented to impacted shared fuse customers.
- While the alternative proposal identifies a number of further issues not addressed by the amended draft determination, we consider these would be more appropriately examined in a more comprehensive review of metering issues.

Since metering contestability was introduced and the smart meter roll out commenced, a range of metering, fusing and service board related issues have emerged that would be best examined in a comprehensive review. We recommend this review take place as soon as possible. It could also examine the impact of reforms subsequent to the introduction of metering contestability. In the meantime, the amended draft is a practical and timely solution to provide clarity to the industry and improved certainty to consumers.

Continued engagement

PIAC would welcome the opportunity to meet with the Commission and other stakeholders to discuss these issues in more depth.

Yours sincerely

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