5 February 2021

Mr Ed Chan
Australian Energy Market Commission (AEMC)
GPO Box 2603
Sydney NSW 2000

Dear Mr Chan

AEMC CONSULTATION PAPER: REVIEW OF THE REGULATORY FRAMEWORK FOR METERING SERVICES (EMO0040)

Endeavour Energy appreciates the opportunity to provide this response to the AEMC's consultation paper on the review of the regulatory framework for metering services. This follows the introduction of competition in metering services in December 2017. The introduction of competition was viewed as the most efficient means by which smart meters could be rolled out across the National Electricity Market (NEM). Smart meters are a key enabling technology of greater access to information, cost-reflective pricing and innovative and improved retail and network service offerings.

As noted in the consultation paper, there have been several issues which have inhibited the competitive roll out of smart meters and seen several parties, including customers, dissatisfied to date. We consider the previous framework prior to this reform remained preferable. Networks had the technical ability and knowledge to provide the service and the economies of scale to do so efficiently. The Victorian Advanced Metering Infrastructure (AMI) rollout resulted in a high penetration of smart meters in a relatively short period time. However, there were negative customer experiences with the inability to opt-out and higher than anticipated costs.

As a result, the 2015 rule change process favoured a competitive framework over a regulated, centralised one, assuming this would result in greater customer benefits being realised. Whilst we understand the rationale and agree that competition can deliver better outcomes for customers in many circumstances, we suggest that a model that built on the experiences of the Victorian AMI rollout would have been preferred to deliver customer and service benefits sooner.

In the current framework Metering Providers (MPs) and Meter Data Providers (MDPs), whilst capable, lack the scale efficiencies of networks and the Financially Responsible Market Participants (FRMPs) (i.e. Retailers) do not possess the core competencies required (i.e. managing a large field based workforce) to deliver the services. This has seen increased coordination costs and inhibited the ability of networks to innovate as they are now restricted from providing behind the meter services and can only trigger meter replacements for failed populations.

As a result, the competitive rollout is occurring in a piecemeal manner with less transparency around the costs being incurred and how this is being ultimately borne by customers. These difficulties may be attributable to a 'learning curve' as new participants establish themselves and scale their operations. However, it makes it difficult to assess the costs and benefits of expediting the rollout and whether there is effective competition. Our inclination is that the fragmentation of the market is increasing the costs of the rollout and reducing the prospect of the full value of smart metering being realised.

We note that the framework does provide counter-veiling powers to customers and networks in the ability to switch retailers and install a 'network device' respectively. However, these powers have not proved effective given the switching costs customers face and the inefficiency associated with a network installing duplicate monitoring and control devices. A lack of effective competition in the metering market also limits bargaining power. For instance, three MPs and MDPs account for 93% of the smart meters in our network area and the three largest FRMPs cover 82% of our smart metering population. In our view, this has created a market with reciprocity between FRMPs, MPs and MDPs but with less incentive for these parties to regard customers and networks.

We note some of these issues have been identified and addressed in subsequent rule changes, such as the introduction of metering installation timeframes. However, the roll out of metering and innovative

service offerings remains suboptimal. For benefits to be maximised there needs to be a coordinated roll out across valuable locations, such as areas with a high penetration of Distributed Energy Resources (DER) or with emerging network constraints. There also needs to be better utilisation of the functionality provided by smart meters to provide improved information and services to customers.

We consider there is a risk that an unregulated oligopoly forms unless there is effective regulation and competitive tension in the metering market. This review provides an opportunity to consider enhancements that can be made to the Rules to better facilitate the optimal deployment of smart meters and the realisation of their associated benefits.

Improve the clarity around the roles and responsibilities

The metering market now involves several parties; FRMPs, Metering Coordinators (MCs), MPs, MDPs, networks, solar installers, Accredited Service Providers (in NSW) and customers. This can create confusion, particularly for customers, in engaging with the right party and ensuring that necessary works are coordinated. There also remains a number of physical barriers to meter installation as outlined in the consultation paper. Collectively, these challenges can slow the pace and increase the cost of the meter roll out. Whilst some of these challenges are a part of the nature of the metering business there are improvements that can be made to the framework:

- Currently, the FRMP is responsible for appointing an MC and ensuring a metering installation exists whilst the MC is responsible for the installation and maintenance, processing and delivery of metering data. Whilst the rules are clear, in our experience MCs do not attend a site until the FRMP arranges a planned outage notification and instructs them to. We suggest the rules are amended so that one party, the FRMP, is responsible for an installation. Otherwise the MC must be given the rights to perform all the necessary actions.
- The FRMP be obligated to take the first call for supply related problems when an interval meter is installed. Customers should not have to engage with multiple parties or wait for multiple site visits where this is unnecessary. The FRMP has the ability to confirm if there are planned outages and if the supply issue is due to a metering installation fault. Further, by updating the B2B systems they can log a 'no supply' call to a distributor on behalf of the customer if necessary.
- We note that AEMO currently exempt many single meter failures from the required replacement timeframes. We suggest that AEMO be obligated to report on exemptions to meter replacements to increase the transparency of why there are long exemptions.
- The responsible party for rectifying switchboard defects be clarified.

Allow for additional meter replacement triggers

The current framework allows for FRMPs to engage with customers to seek agreement to initiate a meter replacement. It does not appear this is being utilised on a large scale, perhaps given the costs and resources required to engage and the low probability of universal agreement. Instead, new connections and faulty meters are the primary drivers of the smart meter rollout to date. We consider additional replacement triggers should be permitted. Particularly those which facilitate larger scale replacement programs which would improve the scale economies of the rollout.

By way of example, Endeavour Energy has recently received an exemption from the Meter Failure Notification (MFN) process under clause 7.8.10 of the NER to transition 2,850 customer to an in-meter based load control device (i.e. within a smart meter) as part of deferring a traditional network upgrade. This solution was proposed by the metering market and avoided the replacement of off-peak relays with smart meters (i.e. reducing duplication) with the agreement of FRMPs and customers (who could still opt out to a Type 4A meter). This program is an example of how networks can work innovatively with MPs and FRMPs to coordinate activities and deliver better outcomes to customers.

We consider the rules should therefore accommodate a meter change trigger when there is agreement by the FRMP and network. This will mean that positive cost-benefit replacement programs can be undertaken rather than only reactive failure replacement programs. This could help improve the scale efficiencies of the smart meter roll out and targeting of high value geographic areas.

Additionally, a more specific trigger could also be included to address shared service fuses. Where a meter is to be replaced that is a part of a shared service fuse the FRMPs of the other meters on the shared fuse could be given the right to replace their meters at the same time. It is also preferable to each FRMP initiating a retailer-led meter change process which would be untimely and contingent on the agreement of all effected customers. A shared service fuse meter replacement trigger may be preferable provided that the customer is not charged for the meter change and still has the right to have the meter installed as a type 4A.

Improve access to data

There also needs to be an improvement in how the resultant data is utilised and shared to ensure that the benefits of smart meters are realised. To date, networks have not been able to enter into commercial agreements to access smart meter data. Further, FRMPs have been opting-out of the cost-reflective tariffs developed with stakeholders and introduced by Endeavour Energy as part of our 2019-24 Tariff Structure Statement (TSS). Only 5% of eligible customers[1] are supplied using our cost-reflective tariffs despite annual demonstration that 90% of customers would be better-off on a cost-reflective tariff option. This means customers may incur the costs of a smart meter rollout without receiving the benefits..

Whilst the pricing issue is one that can be addressed in consultation with customers, retailers and the AER as part of a TSS process the data access issue requires action. As aforementioned, networks have limited bargaining power in acquiring data resulting in proposed access rates that are several times higher than the benefits we estimate can be achieved through the use of the data.

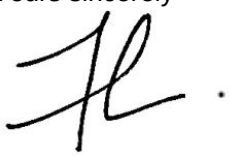
The threat of a 'network device' is a weak one given the costs involved in doing so set a high meter data price threshold and it being limited by the space available on the switchboard. We note that clause 7.15.4(b)(3)(i) directs an MC to provide a network with access to energy data. However, we have found that in practice MC's are unwilling to do so primarily due to restrictive agreements with FRMPs that prohibit the sharing of data. Further, the clause itself provides the MC with discretion as to what it considers is reasonably required by the network rather than what the network considers necessary.

Whilst the data providers are entitled to recover their costs and earn an appropriate return we consider the marginal costs of delivering the data we require should be small and a fraction of what is currently being suggested. If these costs prove prohibitive, customers would avoid the acquisition costs but not be able to benefit from the use of the data to provide a safer, more innovative and reliable supply.

We recommend that the NER clause providing networks access to energy data and/or its enforcement, is strengthened and that some form of price regulation or oversight is introduced. At a minimum this could include expanding network rights to potentially standardised voltage, current and power quality data in specified dispatch intervals via a B2B process. Enhanced data services could be afforded additional time or subject to negotiation 6with light regulation of fees and/or price benchmarking with regular review. We note dynamic exporting of data and monitoring will become increasingly important to improving DER hosting, reporting and the ability to implement any DER related incentive schemes.

Our responses to the questions in the consultation paper are contained in Appendix A to this letter. If you have any queries or wish to discuss our submission further please contact Colin Crisafulli, Manager Network Regulation at Endeavour Energy on (02) 9853 6017 or via email at colin.crisafulli@endeavourenergy.com.au.

Yours sincerely



Françoise Merit
Chief Financial Officer

[1] 23% of Endeavour Energy customers have eligible metering

Appendix A - Stakeholder Feedback Template

REVIEW OF THE REGULATORY FRAMEWORK FOR METERING SERVICES

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in the consultation paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

SUBMITTER DETAILS

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DATE	5 February 2021

PROJECT DETAILS

NAME OF RULE CHANGE:	Review of the regulatory framework for metering services
PROJECT CODE:	EMO0040
PROPONENT:	AEMC
SUBMISSION DUE DATE:	11 February 2021

CHAPTER 1 – INTRODUCTION

1. Consideration of other market reforms and related work	
1.1 Are there other significant market reforms that are likely to impact the metering framework that the Commission has not identified?	We agree that the ESB's Post-2025 NEM design initiatives and data strategy represent the two most significant market reforms likely to have an impact on the metering framework.
1.2 Is there additional related work that the Commission should consider in this metering review?	The AEMC should be cognisant of the considerations and outcomes of jurisdictional reviews and reforms with a similar objective to deliver improved metering outcomes for customers. For instance, in NSW IPART made recommendations in its 2018 Retailers' metering practices final report designed to reduce smart meter installation delays and improve customer service. The NSW Government has also undertaken an extensive consultation process to examine and establish the roles and responsibilities of

	metering participants ahead of the removal of the prohibition on remote re-energisations and de-energisations via smart meters. The arrangements in NSW could inform a nationally consistent remote metering service framework.
2. Assessment framework – Do you agree with the Commission's proposed Assessment Framework for this review? Are there any additional criteria we should consider as a part of this framework?	The proposed assessment framework is appropriate.

CHAPTER 3 – THE CURRENT STATE OF METERING

3. Expectations of meter rollout	
3.1 How does the roll out of smart meters to date compare with your expectations?	We did not have specific expectations on the smart meter roll out but note that in Endeavour Energy's area, rollout is primarily being driven by solar adoption, new home construction (i.e. new developments; knock down and rebuilds) and replacement of failed meters. We envisaged prior to competition in metering commencing that a retailer-led roll out and customers choosing to install smart metering (outside of the above scenarios) would also drive deployment. However, there is little evidence of customers voluntarily taking up this option which may suggest that customers are unaware they can request a smart meter; do not understand the benefits they can deliver; or do not currently value smart meters or their enabling services.
3.2 Is the current pace of smart meter deployment appropriate? What should be the appropriate pace of rollout?	The pace of smart meter deployments is improving with quarterly metering performance data published by the AER indicating the number of installations in Q1 2020-21 is approximately 50% higher than Q3 2018-19. This suggests some implementation issues are gradually being resolved however, customers would benefit from a faster rollout with more smart meter reliant services likely to become economical at higher take up levels. An ad-hoc rollout, as is currently occurring, is likely to have significant inefficiencies, lack economies of scale and geographic operational efficiencies and is therefore leading to higher than necessary costs for consumers.
3.3 What benefits are smart meters providing consumers? Have the benefits changes or improved over time?	We agree with the numerous potential benefits of smart metering as outlined in the consultation paper. In our view, many of these are not being realised as the capabilities of smart meters are currently underutilised and not supported by regulation. For instance, there is limited evidence that detailed metering data is being sought by or provided to consumers which suggests many customers remain passive energy users. Also, data provision to networks is highly complex, slow, often blocked by retailers and burdened by commercial negotiations. These barriers limit the opportunities for networks to access consumption and power quality information that could lead to more informed tariff designs and better network planning and investment decisions which could deliver improved network services and lower prices for customers.
3.4 have the prices for smart meters plus the costs of associated products and services changed from the	We consider there is limited evidence of effective competition in metering. For instance, in Endeavour Energy's network there are two dominant metering providers, a minor third player and other smaller players. Consolidation between metering providers has also inhibited cost reductions in metering.

introduction of *Competition in metering?* If so, how?	
4. Are incentives in the right place?	
4.1 Are the incentives in relation to smart meter rollout correct? Please provide details on why/why not.	Whilst the NER mandates the scenarios where a smart meter must be installed, we consider the framework does not have clear incentives to encourage a more expedited rollout. Providing retailers with an incentive to actively deploy a retailer-led roll out, potentially by removing some of the regulatory requirements which deter them from actively promoting smart meter installation, could accelerate deployment.
4.2 Is the current market structure financially viable? If not, for whom is it not financially viable?	No response.
5. Drivers of smart meter roll out	
5.1 What were your expectations regarding the drivers of smart meter rollouts?	We did not have specific expectations on the drivers of the smart meter roll out but note "new meter deployment" aka retailer-led roll out is the smallest driver of smart meter installations. This contrasts with industry expectations prior to the commencement of metering competition and indicates that competition is not driving retailers to engage with customers and pursue meter churns to the level envisaged. It could also suggest customers are sceptical and reluctant to accept offers of new meters. If so, there needs to be more work done by the industry to educate customers of the benefits of smart metering to stimulate take up.
5.2 Has there been any changes in the overall reasons for installing smart meters since the *Competition in metering* rule commenced?	The reasons to install smart meters remain broadly the same however recent developments have unlocked benefits which should further incentivise uptake. For instance, networks have responded to the rule by developing a range of time-of-use and demand tariffs to provide the opportunity for customers to benefit from changing their electricity usage patterns which was largely only a hypothetical benefit prior to the rule commencing. Similarly, regulations have evolved, and frameworks are more defined to facilitate the emergence of new energy services such as demand response.
5.3 Which parties should be responsible for driving the roll out of smart meters?	Although we consider a distributor-led smart meter rollout would deliver efficiencies and higher levels of take up, departing from the current metering framework structure would likely to be costly and complex process. In our view, it is appropriate for retailers to drive the rollout with MCs, MPs and MDPs responsible for the provision of their respective metering services. However, the rollout could be optimised through greater coordination among participants so deployments could be targeted in areas that capture the greatest whole of system benefit. Network operators are well placed to identify these locations and should have greater influence in determining where the rollout should be prioritised.
5.4 Do consumers have clear information on the benefits of smart meters and their rights relating to requesting a smart meter?	As per our response to 3.1 and 5.1, retailer-led roll out is not a large driver of the overall smart meter roll out contrary to expectations. This suggests more effort is required to communicate the benefits to customers if replacement of functional Type 5 and Type 6 meters remains voluntary. As the customer facing party retailers are best placed to provide this information although a more collaborative effort including networks and consumer advocacy groups could also be effective, possibly as part of an Energy Charter initiative.
6. Customer experience – what are your views on the	No response.

customer experience in relation to smart meter rollout and installation?	
7. Industry Cooperation	
7.1 Do you have any suggestions on how industry cooperation can be improved?	No response.
7.2 Are changes to the market structure or roles and responsibilities needed to improve the consumer experience?	The customer experience could be improved if changes were made that avoided customers contacting multiple parties regarding supply interruption enquiries. This could be achieved if the retailer (rather than directing the customer to contact the distributor) was obligated to accept enquiries made to them by confirming the status of any planned outages for the premise and if the issue is due to a metering fault. If the issue remains unresolved, the retailer can log a no supply call via B2B on behalf of the customer.
8. Expectations of metering services	
8.1 What expectations did you have around the services that smart meters would provide?	In broad terms, we considered smart meters would deliver significant efficiencies in metering services through remote capabilities (e.g. reading, disconnection and reconnection). We also expected customers would be able to take advantage of improved access to real-time consumption data to reduce costs by altering usage patterns in response to cost-reflective tariffs. From a planning perspective, we anticipated that improved access to quality of power data would improve forecasting accuracy, the efficiency investment decisions and allow networks to more successfully identify and deliver demand management and non-network opportunities.
8.2 What services are being provided by smart meters currently? Are these services widely available?	To our knowledge, most smart meters in Endeavour Energy's network area are only being used to perform billing functions. Given few customers are on cost-reflective tariffs, only the most basic capabilities of smart meters are typically being utilised.
8.3 What services dd you expect from smart meters which have not eventuated?	Besides billing, smart meters have the technical capability to measure a range of power quality parameters such as voltage, current, power factor etc. This type of data is generally not collected at a granular level in all locations by networks and would be very useful to make better informed operational and investment decisions. However, the provision of some metering data to other participants is being prevented due to complex negotiation to access data and in some cases contractual barriers between retailers and metering service providers that prohibit data sharing to third-parties.
8.4 Are there any services being provided by smart meters which were not anticipated at the time of the *Competition in metering* rule change?	No response.

CHAPTER 4 – THE FUTURE STATE OF METERING

9. Collection and use of metering data	
9.1 In relation to metering data, what data should be captured by smart meters, and why?	From a network perspective, we would value capture of and access to: • Power quality parameters including voltage, current, reactive power (max, min and average quantities). • Gross solar output

9.2 In relation to metering data, who should be able to access metering data, and how? What protections should be in place?	Access should be provided to: • The customer • Networks The metering framework has provided MDPs an opportunity to establish monopoly visibility of a customer connection point in terms of power quality data (i.e. the meter will not churn for such data services). The lack of competitive tension for these services has led to the charges for access to data to be prohibitively high which we suspect is much more than the marginal cost of capturing and providing this data plus a reasonable commercial return. Our analysis suggests that currently data access rates being charged by MDPs are 3-5 times the customer benefits (safety, reliability, solar hosting etc.) that could be achieved using this data. We believe providing a solution to this issue should be priority for the review and the AEMC should consider strengthening the regulatory obligations around data sharing and providing access at low cost. Options to improve the cost issue may include introducing data charge caps or regulated rates for data provision. Greater transparency of the marginal costs of providing power quality data may also encourage a reduction in charges. To improve access, NER clause 7.15.4(b)(3)(i) – which states that this data can be shared with networks where it is required by the Local Network Service Provider to enable it to meet its obligations to provide a safe, reliable and secure network – may require strengthening. Also, improved oversight and enforcement of this clause may be required to deter restricting network access to metering data.
9.3 What impact do you think the Consumer Data Rights may have on the access to, and use of, metering data?	The Consumer Data Right (CDR) will allow customers to benefit from lower cost energy services facilitated by fast access to relevant data. We consider it contrary to the general objective of the CDR for customers to fund the costs of smart meter installation and associated metering and billing services and also fund the cost for networks to gain access to their data at higher than efficient prices. We do not believe the CDR can resolve the high metering data charges which networks cannot justify paying at current rates. Without genuine competition or regulatory intervention, we expect charges will remain prohibitively high.
10. Future metering services	
10.1 What is your understanding of the other services that smart meters can provide?	Services of value to the network which can be enabled by smart meters include: • Remote off-peak load control (currently) • Outage notifications (currently) • In-meter neutral integrity monitoring (future) • Demand Response DRED (future) • Inverter Control for curtailment or VPP action (future)
10.2 What future services do you expect or want metering to facilitate?	Future services, particularly around DER, could require devices controlled by multiple parties to be installed on a customer's switchboard. Even when additional devices can be accommodated on the switchboard, a lack of coordination among parties could lead to cost duplication. This would be inefficient and could be avoided if the meter could serve as a "hub" which can host third party service provider applications (VPPs operators etc.) at much lower marginal cost than installing multiple devices and hardware.
10.3 If additional services are to be provided by smart meters, how should the costs	No response.

of providing these services be allocated?	
11. Penetration of smart meters required	
11.1 Are particular metering services only cost effective when a particular penetration is achieved? If so, what services and what penetration is required?	Off peak load control is a metering service that requires all customers in a geographic zone substation supply area to move to smart meters before the network owned conventional load control assets in the substation can be decommissioned.
11.2 What other factors are important in determining whether the provision of particular services are efficient or effective (e.g. geographic spread).	Many network related use cases leveraging smart meter data are only effective with higher penetration of smart meters. For example, LV phase identification and transformer connectivity identification. Other use cases require a representative (statistical) spread of meters across the network. For example, advanced voltage control leveraging smart meter data. The ad-hoc approach to smart metering means that the application of these various use cases will not be uniformly possible across the network.

CHAPTER 5 – ARE CHANGES REQUIRED TO THE REGULATORY FRAMEWORK?

12. Encouraging the adoption of smart meters and future services	
12.1 Is the current regulatory framework appropriate for the current needs of metering and the market? Is it flexible enough to provide encouragement for the development of future services in metering?	There exist barriers to a network initiated smart meter rollout where it would lead to cost to serve reductions for consumers. These barriers include: • Multi-party negotiations with multiple metering providers and retailers. • Restrictions on networks to initiate meter swaps. Currently this is only possible for failed meters and not for proactive replacements even with consent from retailers. These barriers are leading to lost opportunities in whole of system cost optimisation and asset duplication (for example monitoring and load control). In our view, the framework would benefit from providing networks with a greater ability to influence the roll out strategy. The roll out and provision of metering services is largely controlled by retailers but rarely does this consider efficient outcomes for network operators. Moreover, retailers have demonstrated an uncooperative stance towards network operators accessing power quality data (which are network parameters). We consider the ad hoc approach of the current strategy is a key reason why the pace of take up and penetration rates are lower than the Victorian experience and overseas. The framework needs to be more flexible as the system transformation and the emergence of new energy services rely on leveraging smart metering to reduce whole of system costs.
12.2 To encourage the higher adoption of smart meters: (a) What changes, if any, need to be made to the current regulatory framework for metering services? (b) What changes, if any, need to be	Removal of regulatory barriers for network initiated smart metering rollouts where such a rollout would lead to reduced network costs for customers. Changes to the rules should also be considered to address circumstances which make installing new meters problematic. For instance, frequent site visits and planned interruptions common to shared fuse premises could be alleviated by increased coordination among retailers to allow all affected meters to be replaced simultaneously. Another situation requiring consideration is when a new meter would trigger a switchboard replacement (e.g. not enough room on the

made to other instruments? (e.g. regulatory instruments, guidelines, codes)	switchboard, presence of asbestos, wiring defects etc.). Uncertainty over who is responsible for rectifying defects (or an unwillingness to fund rectification work) is delaying the installation of meters.
12.3 Are there any other avenues of encouragement that are available that the Commission has not considered in this paper?	No response.
13. Barriers to realising the benefits of smart meters	
13.1 Are there other barriers that were not identified by the Commission that you have found to prevent the realisation of benefits of smart meters and/or slowed the rollout of smart meters in the NEM?	Excessive charges for power quality data is a significant barrier which stems from MDPs essentially having monopoly control of metering data as the high costs involved in churning a meter for data services prevents churning and preserves their incumbency. One option is for networks to install a network monitoring device, but this is a clear cost duplication and not in the interests of customers. This situation has: • Slowed access to this data. Most networks are only accessing a small fraction of useful and valuable available data. • Reduced benefit for consumers. The many use cases for this data are not being realised. This includes customer safety benefits. In our view, the expected network benefits of competition in metering data services has not been realised and natural near-monopolies are forming. This requires regulatory intervention to avoid profiteering by metering service providers and to ensure that whole of system benefits to consumers is maximised.
13.2 What changes, if any, need to be made to the current regulatory framework for current arrangements to improve deployment?	No response.
13.3 Are there other tools outside of the regulatory framework that may address some of the current barriers to realising the benefits of smart meters and/or the slower rollout of smart meters in the NEM?	No response.

OTHER COMMENTS

14. Information on additional issues	Since the introduction of competition in metering we have encountered operational issues that have impacted service delivery. We consider rule changes may be required to address these issues which are outlined below. • Meter malfunctions. The definition of a malfunction includes instances where data cannot be obtained remotely. In practice, this failure can also be due to issues unrelated to the meter (e.g. communication outage). Cognisant of these other causes, AEMO has demonstrated an alternative interpretation of the definition that excludes remote failures and has regularly granted MPs an exemption from the requirement to rectify the meter malfunction within 15 business days. These exemptions often result in MPs not attending the site to confirm the cause of the issue and where the issue is related to the

	meter, remote data collection issues remain unresolved. As a consequence, billing is based on estimated reads. We suggest that the definition of meter malfunctions be clarified to avoid meter rectification delays. • DER installation. We have increasingly observed DER being installed prior to the installation of the required interval meter, particularly when a customer engages an independent solar installer rather a retailer. In these cases, customers typically disregard advice to wait until they have arranged an interval meter to be installed and activate the solar installation with non-compliant metering. Where this advice is followed, accessing the benefits of the system is delayed. It is our understanding that this process has become standard practice as a request for a new meter requires key information which cannot be obtained prior to the solar being installed (e.g. inverter details etc.). This prevents solar providers arranging a meter in parallel to the solar installation. • Back billing. When considered together, NER cl. 6B.A3.1(a) and NERR s. 137(3)(a) prevents networks from back billing undercharged amounts to retailers if the retailer cannot in turn recover the undercharged amount from the customer (with exceptions). Increasingly, we are observing instances where undercharging is a result of metering faults not being rectified or retailers not updating their systems in a timely manner to accurately capture newly installed meters. Where the delay in meter rectification or between the meter installation and entering details into the system is more than 9 months, we consider networks should not be prevented from billing the retailer for any undercharged energy consumption. To avoid the disputes, delays and administrative costs associated with NER cl. 6B.A3.1(a), this clause should not apply where it is found the retailer has caused this issue through poor meter management processes. • Metering responsibilities. The NER specifies that the FRMP is responsible for appointing a MC and ensuring a metering installation exists and the MC is responsible for the installation and maintenance of the metering installation, and the collecting, processing and delivery of the metering data. Despite this, when issues arise there can be differing views on who is responsible to resolve metering matters. For instance, MCs often do not attend the site until the FRMP has arranged for a planned outage notification and they are instructed to arrange the relevant metering work by FRMP. There would be benefits of updating the rules to make it clear that one party is responsible for the metering installation. We suggest that this be the FRMP as significant amendments to the rules would be required to provide MCs the rights to perform all the necessary activities to meet this obligation (e.g. the right to perform a planned interruption etc.).