

28 April 2020

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

Electronic Lodgement

Dear Ms Toomey,

### **Australian Energy Market Commission (AEMC)'s Introduction of metering coordinator planned interruptions - ERC0275**

Energy Networks Australia are pleased to have the opportunity to make this submission in response to the AEMC's Introduction of metering coordinator planned interruptions.

Energy Networks Australia is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

Energy Networks Australia members are supportive of efforts to create better outcomes for customers, but do not believe that all aspects of the rule and the alternative solution sufficiently address the complexity of real world scenarios.

#### **Maintain Clear Responsibilities in a Contestable Market**

It is the opinion of our members that the alternative solution proposed by the Competitive Metering Industry Group (CMIG) will blur the lines between contestable and regulated work. Especially when costs for this work will be borne by Distribution Network Services Providers (DNSPs) and by extension smeared across all customers, introducing new equity issues for minimal benefit.

#### **Suggested Amendments to the Draft Rule**

We note some areas where changes to the draft determination are proposed

1. We suggest incorporating mechanisms for incorporating flexibility to the 25 business day obligation in dealing with complex scenarios such as multiple occupancy, meter family failure, times to better suit customer preference etc.
2. There should be no obligation to notify all affected retailers via B2B as this will result in increased costs for minimal practical benefit
3. DNSPs support updating MSATS with shared fuse information, but **do not** support supplying the same information via B2B as this is duplication of effort and costs when MSATS is already visible to all Market Participants
4. An extension of implementation start dates to allow time for system and process changes

### The “Alternative Solution” Should be Addressed Separately

It is the opinion of all DNSPs that this rule change and the alternative solution are discussing separate issues and this is not the appropriate forum to address the alternative solution.

Due process should be followed and we would support the alternative solution being discussed in greater detail a separate rule change.

Thank you for this opportunity to provide feedback and should you have any queries on this response please feel free to contact Dor Son Tan, Head of Distribution at [dstan@energynetworks.com.au](mailto:dstan@energynetworks.com.au).

Yours sincerely,



Andrew Dillon  
Chief Executive Officer