

13 February 2020

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Alisa,

Draft Rule Determination – Introduction of Metering Coordinator Planned Interruptions – ERC0275

PLUS ES welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) Draft Rule Determination -Introduction of Metering Coordinator Planned Interruptions – ERC0275.

PLUS ES continues to support CMIG's rule change objective to enable the MC to affect a planned interruption, within the scope of safety regulations. It is the most cost effective and efficient proposed process in delivering the best outcome for the electricity consumer.

Proposed AEMC Draft Rule

The draft rule proposed provides a few points of efficiencies but does not address and resolve most of the shared isolation issues faced by stakeholders of the metering works request.

The figures below provide an outline of a generic process for the below scenario:

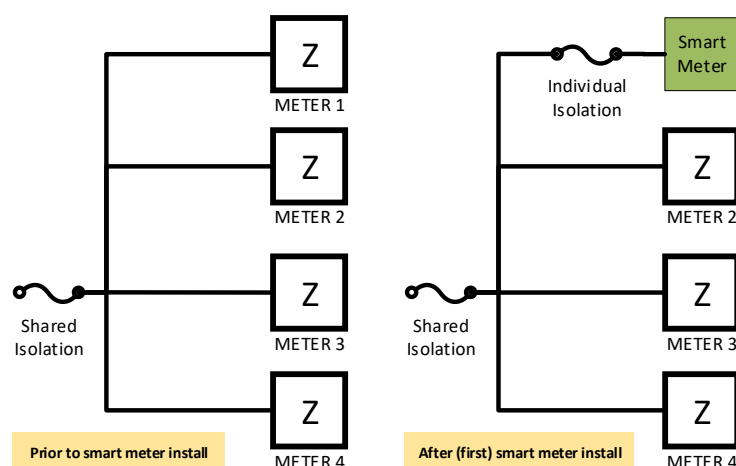


Figure 1: Shared Isolation Scenarios

UNIDENTIFIED SHARED ISOLATION POINTS - METERING WORKS

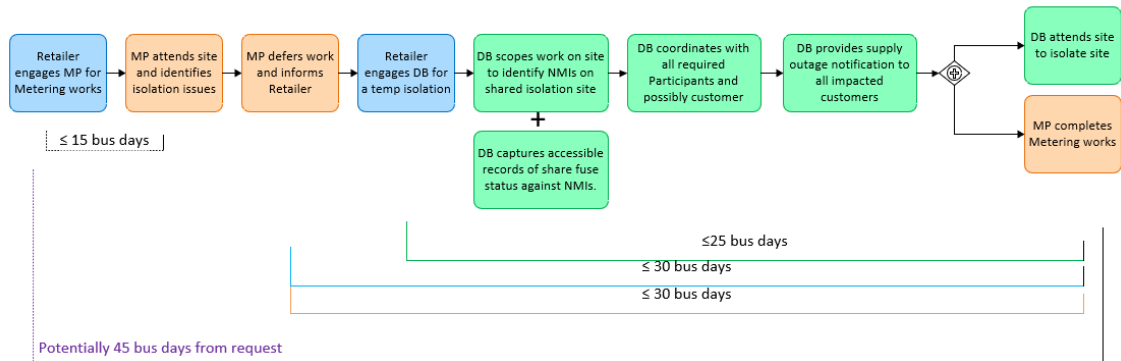


Figure 2: AEMC proposed rule changes for 1st site visit where an unidentified shared isolation point exists

IDENTIFIED SHARED ISOLATION POINTS - METERING WORKS

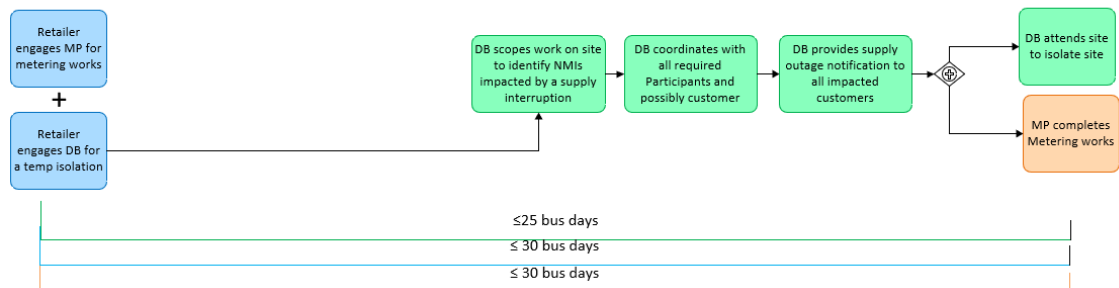


Figure 3: AEMC proposed rule changes for subsequent site visits where known shared isolation points exists

Table 1 below outlines additional feedback to the AEMC proposed draft rule:

Table 1: PLUS ES feedback to drafted rule changes

Item	Details
Consumer Protection	<p>This has been identified as a limiting factor for the proposed rule.</p> <p>PLUS ES believes that consumer protections are already available within the industry frameworks and recommends that further consideration should be given to additional consultations and analysis on the topic.</p> <p>This would enable opportunities to streamline the process, especially with site visits where the existence of shared isolation points is not known.</p>
Shared fuse information not known	<p>For sites which experience supply isolation issues and the information is not known prior to a site visit, the rule does not provide any benefits to current state obligations. See Figure 2.</p>
Outage per customer request	<p>The proposed rule has not delivered any enhancements to avoid outages for those consumers who share a supply isolation point and have not requested the metering works. For each instance, where a customer's metering request requires a supply interruption, all consumers on the shared isolation point will experience an outage.</p> <p>Providing an individual isolation to a meter – such as a Meter Protective Device (MPD), as defined in NSW - to a meter installation will not prevent that customer from being interrupted in the future, i.e. when their neighbour's metering requirements warrant a supply outage. See Figure 1 and 3.</p> <p>The only time a supply interruption can be avoided is if all the isolation issues at the site are resolved. i.e. all the meters linked to the shared supply isolation point have individual isolations installed.</p> <p>There is a cost incurred ranging in the hundreds of dollars for every outage due to the supply interruption.</p>

NER Clause 11.86.7(g)(3)	<p>The clause places the obligation for the MC of type 5 and 6 metering installations to provide in the metering malfunction notice information when they are aware that repairing the meter requires interrupting supply to another retail customer.</p> <p>PLUS ES suggests the proposed wording prescribes a process rather than an obligation.</p> <p>The obligation should be that the Initial MC provides information about a shared fuse dependency on an NMI, when known, rather than the how. The 'how' could be included in the relative metrology procedures, as drafted in NER Clause 7.16.3(c)(7).</p>
NERR Clause 59C(4)(a)	<p>Currently customers may receive multiple planned outage notifications which cause confusion and, in some cases, may escalate to complaints. In the case of shared isolation points, the retailer requests the network to perform a supply interruption. The network will give their own planned outage notification to the impacted customers.</p> <p>PLUS ES suggests if a retailer and network planned outage overlaps, the obligation of the notification should be on the network to provide, as:</p> <ul style="list-style-type: none"> • A single notification mitigates customer confusion and complaints due to misaligned/multiple notifications and • The network will always be the common market participant for all the consumers on the site
NERR Clause 11A.1(a)	<p>As per justification against NERR Clause 59C(4)(a), PLUS ES suggests the wording in the clause remains as is.</p>
NERR Schedule 1 (a) and Schedule 2 (a)	<p>As per justification against NERR Clause 59C(4)(a), PLUS ES suggests the wording in the clause remains as is.</p>

Additional Considerations for Proposed Rule

PLUS ES believes there are opportunities to improve the draft rule to deliver more efficient and streamlined industry practices and ultimately more cost-efficient customer services.

PLUS ES proposes the following enhancements in Table 2 for AEMC's consideration with respect to this draft rule:

Table 2: PLUS ES proposed rule optimisations

Item	Details
Resolution of shared isolation sites	<p>PLUS ES supports and advocates an obligation to be implemented on the networks to install MPDs/meter isolators on all consumer metering installations that share an isolation point. Additionally, appropriate provisions in the Rules for the network to meet the obligation should also be considered.</p> <p>To realise the below benefits, this activity must be achieved during the first interruption of the site.</p> <p>Benefits of this obligation:</p> <ul style="list-style-type: none"> • Consumer will only be interrupted for their own supply requests – neighbour's metering requirements will not cause outages for them • Cost savings and process efficiencies as it eliminates all subsequent site visits that the network would have had to make – including: <ul style="list-style-type: none"> ○ Actual visit ○ Network Planned Outage Notifications ○ Retailer processes ○ Co-ordination activities • Timeframes streamlined to metering installation timeframes or as agreed with the one consumer – better customer service • It is proposed that the networks could recover the cost for the installation of individual meter isolation through the regulated revenue cost recovery mechanisms • The volume of shared isolation sites will decrease over a period of time • Metering works for large complex sites will be able to limit the interruption to per consumer basis, once the isolation issues have been resolved. This would provide more flexibility for the retailer and metering provider to complete a metering request. <p>See figures 4 & 5 (below) for a diagrammatical representation of the proposed improvements.</p>

Figure 4 provides a comparison of the current metering isolation requirement vs the proposed site resolution of shared isolation issues.

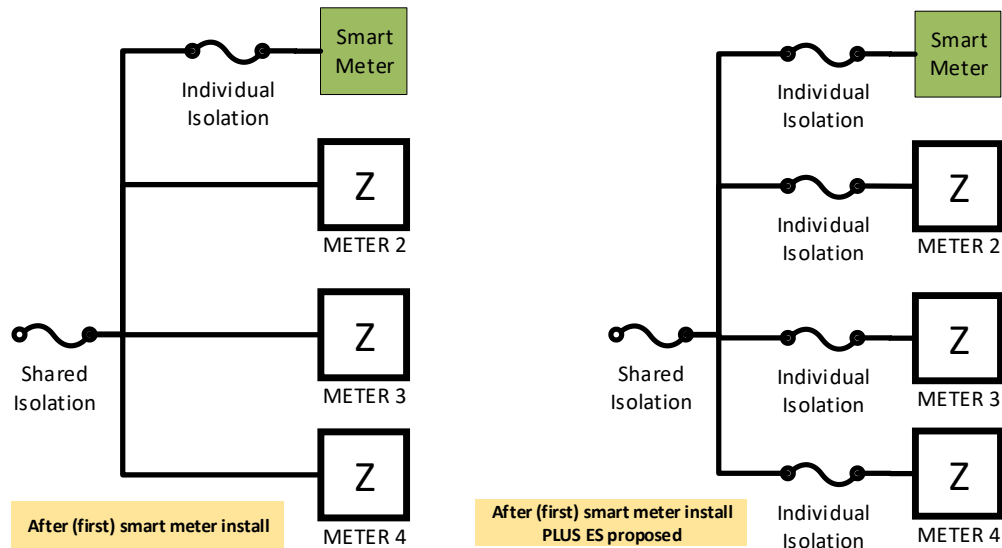


Figure 4

Figure 5 below provides a generic process overview incorporating the PLUS ES amendments advocated in Table 2.

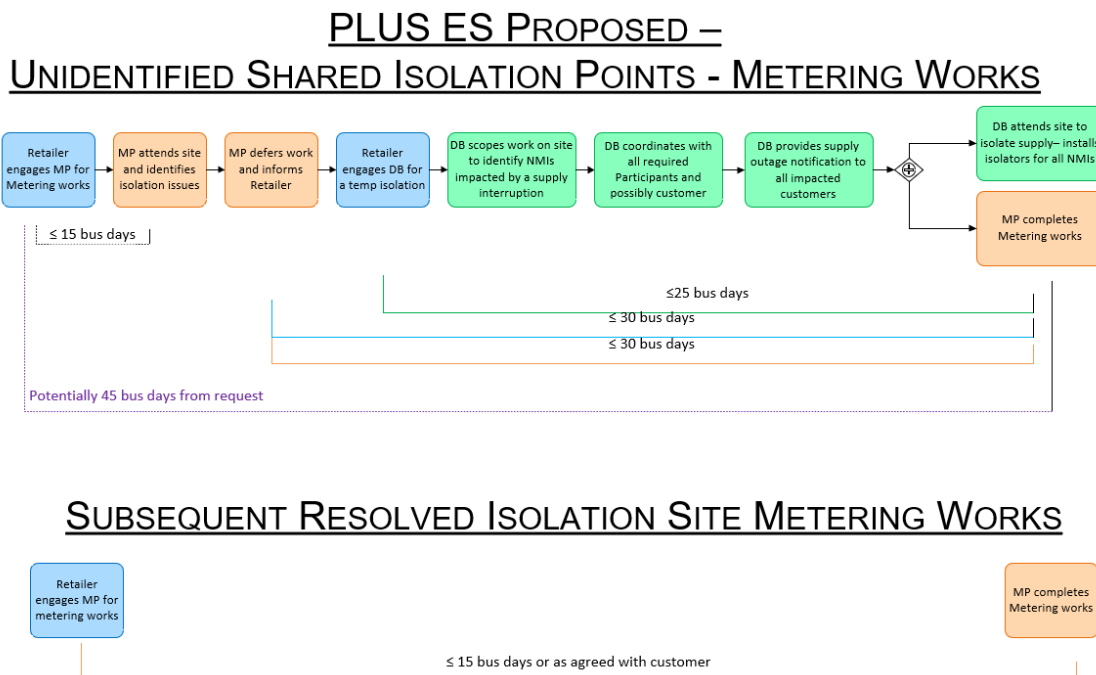


Figure 5: PLUS ES proposed optimisations



PLUS ES would welcome any further discussion in relation to this submission.

If you have any questions or wish for further discussion, please contact Helen Vassos on 0419 322 530 or at Helen.vassos@pluses.com.au.

Sincerely,

A handwritten signature in blue ink, appearing to read "Darren Ferdinands", with a stylized, cursive script.

Darren Ferdinands

Head of Metering - PLUS ES