

24 April 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 additional feedback to the Australian Energy Market Commission's (AEMC) Draft Rule Determination -Introduction of Metering Coordinator Planned Interruptions – ERC0275 following the workshop held on 20 April 2020.

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.

PLUS ES, as noted in our previous submission, believes there are opportunities to improve the draft rule to deliver more efficient and streamlined industry practices and ultimately more cost-efficient customer services. Hence, we strongly support further exploration and analysis is undertaken by the industry, for the alternative proposed option where the shared fuse is resolved upfront, for all impacted NMIs ,downstream of the shared fuse. This will enable the following objectives to be achieved:

- Customers will incur a planned outage for their metering works alone – post the resolution of the shared isolation.
- Mitigation of wasted truck visits
- Turnaround timeframes will be faster - within the single fuse metering installation timeframes as there is no dependency on the DNSP for a supply isolation
- Costs incurred due to supply isolations and all the impacted NMIs, will dramatically reduce
- Operational efficiencies including but not limited to, co-ordination limited to the customer, the metering provider and the retailer.

Proposed AEMC Draft Rule

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

works request, especially the end customer.

The table below contains PLUS ES' feedback to the questions asked in the 20 April 2020 Workshop presentation:

Table 1: PLUS ES feedback

Questions	PLUS ES Feedback
<p>Timeframe for installation of meters (slide 21)</p>	
<p>1. Should allowance be made in the timeframes to provide retailers greater opportunity to utilise the supply interruption to carry out other meter replacements, such as for family failure?</p>	<p>No. The timeframes should remain as they are.</p> <p>A lot of factors would impact the scenario to the left.</p> <ul style="list-style-type: none"> In the extreme cases, the co-ordination becomes complex, the outage period increases proportionally to the number of meters being exchanged – this is without factoring in the ‘end consumer’ factor. The outage is not only impacting those consumers who have requested or agreed to the meter exchange but also those who have not provided agreement. Depending on numbers of meter exchanges this could also potentially create a safety issue if multiple MPs are attending a site. They’ll be competing for space to complete the metering work at the same time. Increased costs could potentially be incurred by MPs due to loss of productivity.
<p>2. Should the rule allow DNSPs the ability to prioritise critical work (for example, supply restoration in the event of a severe weather event)? If so, how should this be done, while minimising delays in meter installation for customers with shared fusing?</p>	<p>Severe weather events would also impact meter installations albeit only those in the specific area of the weather event.</p> <p>The DNSP should be able to prioritise critical work but this needs to be clearly defined as supply restoration.</p> <p>Extending the timeframe overall would not resolve delays caused in these situations. Exemption conditions and/or a shared fuse process would provide a better outcome and could potentially deliver better outcomes for the customers.</p>
<p>3. Should customer choice of meter installation date be included in the rules, consistent with the meter installation</p>	<p>No, as it would be very difficult to manage customer’s installation dates and be compliant with the timeframes especially. The complexity would grow proportionally with the number of customers impacted with a shared fuse and the number of Retailers involved. Customer choice of installation date is only practical where there is</p>

<p>timeframes where there is single fusing? What are the complexities of customer choice with shared fusing?</p>	<p>single customer affected. By definition, sites with a shared fuse will always involve multiple customers.</p> <p>It would be more efficient if the DNSP provides the planned outage notification to the customers, as they are potentially the common participant for shared fuse customers. Their current processes would also take into consideration any sensitive loads or life support customers. If enough notice is provided (4+ bus days) the impacted customers have enough time to make alternate arrangements.</p>
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Additional notification to market participants for planned interruptions (slide 22)

<p>1. Should an additional requirement be placed on DNSPs to inform all affected retailers of the planned supply interruption via B2B procedures?</p> <p>a. What are the benefits that can be gained from providing this information? Are there any impediments to being able to utilise this additional information effectively?</p> <p>b. What are costs to provide this functionality? Are system updates required? What implementation timeframe would be needed if this obligation is imposed on DNSPs?</p>	<p>DNSP planned supply interruption notifications in general, not only for shared isolations, would provide a benefit to all market participants, not just to the retailers.</p> <p>B2B procedures have the benefit of being a standardised form of comms from which a recipient can accept and then trigger subsequent processes, specific to a NMI, in an automated, efficient way. Therefore, we would recommend B2B being used to inform of planned supply interruptions.</p> <p>a. The retailers and metering co-ordinators/providers could use this information to leverage DNSP planned notification and schedule imminent metering works which otherwise would potentially require an additional outage to the customer/s.</p> <p>Additionally, the provision of this information to the MP would reduce resource effort in investigating causes for meter communication faults and alarms, caused by the supply interruption.</p> <p>Any impediments should be mitigated by procedures. i.e. not impacting the DNSP scheduling, extending the outage timeframes etc.</p> <p>b. There would be systems and business process updates also required by the <u>recipients</u> to receive the DNSP outage notification. This would require a minimum of 6 mths following the updating of industry procedures etc. Costs to implement as a recipient is unknown currently, as it is dependent on the final</p>
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	requirements. The benefits however would support a business case for implementation.
2. How does a retailer currently receive information on planned interruptions of its customers?	<p>DNSPs publish this information on their websites. This information is not necessarily provided to the granular level required.</p> <p>The MPs also visit the website to investigate their meter alarms and communication faults. They have to determine if the information available is pertinent to their specific meter.</p>

Timeframes for implementing the rule (slide 23)

1. What system changes or process changes are required to meet the additional meter installation timeframes where shared fusing is discovered?	<p>There would be a requirement to identify the SO as specific to shared fusing so that the recipients are aware of the timeframes involved.</p> <p>System and business process changes would need to be made to also ensure the stakeholders of the E2E process have identified and adjusted their impact points, including but not limited to the scheduling and reallocation of their resourcing to meet the timeframes.</p>
2. What system changes are required to enable the recording of shared fusing information (considerations should include time to review and consult on AEMO's guidelines, system changes etc)?	<p>The recording of shared fuses should be in a central market repository, i.e. MSATS</p> <p>The system would need to:</p> <ul style="list-style-type: none"> • Identify the presence of shared isolation at the NMI level • Maintain a link with other NMI's that are affected by the same shared isolation (1 and 2 could potentially be achieved with an identifier - e.g. number - for the isolator, and that identifier stored against each affected NMI) • Maintain a record of the presence of an individual isolator (to cover the circumstance where there is upstream shared isolation affecting a site with individual isolation) • A mechanism to synchronise and update the information when changes are made (i.e. individual isolation retro-fitted to an installation) • Responsibilities would need to be established as to which parties are obliged to update the data and when

	<ul style="list-style-type: none"> The information would need to be available in report, so that the information could be interrogated from MSATS prior to organising site visit.
3. Are there certain requirements under the draft rule where more time is needed?	n/a
4. What other system changes and / or other situations (for example Covid-19) may impact implementation timeframes?	n/a
5. What implementation timeframes would be realistic, if the draft rule (incorporating the suggested amendments) was made?	<p>The timeframes are dependent on the scope of the changes within the draft rule.</p> <p>For low/medium complexity: A minimum of 6 mths to enable system and business enhancements, following the finalisation of any rule and industry procedure development/updates</p> <p>For high complexity: 6-12 mths.</p>
Recording shared fusing site information (slide 24)	
1. Do stakeholders have any additional comments on the requirements in the draft rule for DNSPs to record shared fusing information and for market participants to inform DNSPs whenever shared fusing is discovered?	<ul style="list-style-type: none"> The MP/MC would only be able to positively identify the MP/MC's individual NMI that is affected by shared isolation. The other affected NMI's would require discovery by DNSP, as the common participant across all impacted NMIs in all scenarios. Recording of MPDs shall be completed by the party responsible for installing the MPD

<p>2. Are there benefits to be gained by non-verified information being recorded? Would site visits be reduced, e.g. the retailer can schedule a DNSP planned interruption from the start?</p>	<p>information = information about the shared isolation situation at a NMI</p> <p>verified = shared and individual isolation positively identified by site visit/visual inspection?</p> <p>non-verified = shared and individual isolation information being determined probabilistically? – e.g. “<i>all duplexed – potentially identified by street numbering – is likely to have shared isolation, therefore bulk populate fields</i>”</p> <p>One needs to be able to work with verified information, otherwise, as per the example, there is potential to have the DNSP and the MP incur a wasted truck visit. The verification should be an output of a site visit or visual inspection. The DNSP is required to go out and perform the isolation. They are the best placed participants to confirm all the shared fuse information and update the market register with verified information only. This will enable the following benefits realisation:</p> <ul style="list-style-type: none"> • Mitigation of a wasted truck visit by the metering provider and • Retailers for future metering requests would recognise the shared isolation and streamline their service request processes to deliver better customer service to their end consumer.
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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,



Darren Ferdinands
Head of Metering - PLUS ES