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14 February 2020

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Mr Pierce,

RE: ERC0275 – NATIONAL ELECTRICITY AMENDMENT (INTRODUCTION OF METERING COORDINATOR PLANNED INTERRUPTIONS) RULE 2020, NATIONAL ENERGY RETAIL AMENDMENT (INTRODUCTION OF METERING COORDINATOR PLANNED INTERRUPTIONS) RULE 2020

The Energy and Technical Regulation Division (Division) of the Department for Energy and Mining thank you for the opportunity to make a submission on the *National Electricity Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule 2020*, *National Energy Retail Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule 2020* draft rule determination issued by the Australian Energy Market Commission (AEMC) on 19 December 2019 (ERC0275).

The Division is pleased that the AEMC draft rule determination has considered the potential risks raised in the Division's submission to the consultation paper, as well as all other risks identified by stakeholders regarding consumer protections. In addition, the Division agrees that the AEMC's more preferable draft rule better satisfies the National Electricity Objective (NEO) and the National Energy Retail Objective (NERO).

In our view, the draft rule strikes a balance between providing a timeframe for metering-related services for customers who have shared fusing with other customers whilst maintaining appropriate customer protections.

The Division agrees that strengthening the provisions within the National Electricity Rules (NER) and National Energy Retail Rules (NERR) for retailers and Distribution Network Service Providers (DNSPs) is appropriate, rather than allowing Metering Coordinators (MCs) to arrange planned interruptions for any electricity customer. This removes any unnecessary risks that would have been introduced if the rule change request was implemented in its initial form, with respect to consumer protections.

In particular, the Division supports the requirement on DNSPs to record the shared fusing information as soon as practicable through the Australian Energy Market Operator's (AEMO's) Market Settlement and Transfer Solutions (MSATS) system. This information should not be audited, as this would introduce unnecessary costs for static-based information. Instead, retailers, MCs and DNSPs should consider the

accuracy of the information through business-based decisions and take appropriate steps when delivering metering-related services to customers on shared fusing.

Thank you again for accepting our submission. Should you wish to discuss this further, please contact Ms Rebecca Knights, Director, Energy and Technical Regulation Division, on (08) 8429 3185.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Vince Duffy', with a stylized, cursive script.

Vince Duffy

Executive Director, Energy and Technical Regulation