

13 February 2020

Mr John Pierce
Chair
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1325

Via online submission.

Dear Mr Pierce,

Re: ERC0275 – NATIONAL ELECTRICITY AMENDMENT (INTRODUCTION OF METERING COORDINATOR PLANNED INTERRUPTIONS) RULE

TasNetworks welcomes the opportunity to make a submission to the Australian Energy Market Commission's (**AEMC**) Draft Rule Determination concerning the National Electricity Rule Amendment - Introduction of Metering Coordinator (**MC**) Planned Interruptions.

As the Transmission Network Service Provider, Distribution Network Service Provider (**DNSP**) and jurisdictional planner in Tasmania, TasNetworks is focused on delivering safe and reliable electricity network services while achieving the lowest sustainable prices for Tasmanian customers. TasNetworks is also currently assessing the feasibility of Marinus Link, a second Bass Strait interconnector between Victoria and Tasmania. All of these roles require the prudent, safe, secure and efficient management and development of the Tasmanian power system. TasNetworks is therefore appreciative of the AEMC's efforts to review Metering Coordinator and retailer powers under the National Electricity Rules and the National Electricity Retail Rules (**Rules**).

TasNetworks supports the AEMC's clarification of the Rules in relation to retailers' allowed actions during planned interruptions. Clarifying that retailers are able to interrupt the supply to any of their customers to enable metering works for another of their customers will increase positive customer outcomes as it will decrease the time required to action metering works. The current Rules are open to interpretation, and this is resulting in communications between retailers and DNSPs that increase the risk of unnecessary delays in delivering customers' desired outcomes.

While TasNetworks agrees that the draft Rules provide certainty of new meter installation times for customers with shared fusing, the specified timeframe should also allow for

customer choice. For example, if a customer does not wish to allow a planned electricity interruption at their premise within the proposed timeframes of 25 or 30 days, National Electricity Market (**NEM**) participants should not be penalised for agreeing to this request. Therefore, TasNetworks suggests that the final Rule determination include a process for penalty free, customer led timeframe alterations for planned interruptions.

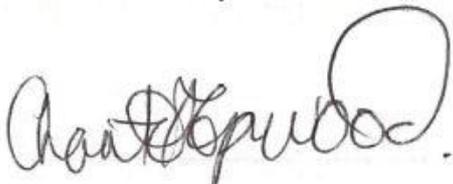
As the draft Rule includes procedural changes which will likely lead to system changes, TasNetworks suggests the number and complexity of already scheduled system changes be considered prior to the selection of a start date for this Rule change. This would allow NEM participants to adequately embed the already scheduled changes before commencing new ones. Specifically, TasNetworks would recommend this course of action for those obligations related to business to business transactions and Market Settlement and Transfer Solution (**MSATS**) data recording and maintenance.

Postponing the obligation start date would also have the benefit of cost savings to NEM participants' customers through the reduction of rework and makeshift manual work around processes. For example, an unconsidered obligation start date could require the manual handling of data by employees of NEM participants, which would result in increased resourcing costs.

To further reduce costs to NEM participants' customers, TasNetworks advocates for implementation costs that are thoroughly considered, especially in relation to changes to information recorded and maintained in MSATS. This is because what can appear to be a minor system change can in fact result in major expenses for DNSPs. To alleviate this, TasNetworks suggests that all attempts are made to reduce the costs that are associated with the increased gathering and maintenance of information, such as shared fuse information. Such a reduction would also result in lower overall costs in implementing this Rule, a result which benefits all NEM customers.

Should you have any questions, please contact Tim Astley, Team Leader NEM Strategy and Compliance, via email tim.astley@tasnetworks.com.au or by phone on (03) 6271 6151.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chantal Hopwood', with a large, stylized loop at the end of the name.

Chantal Hopwood
Leader, Regulation.