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Submission on the AEMC's Workshop Questions on the Introduction of Metering Coordinator Planned Interruptions

Introduction

1. This is Vector Limited's (Vector) second submission on the Australian Energy Market Commission's (AEMC) draft rule determination, dated 19 December 2019, on the proposed *National Electricity Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule 2020* and *National Energy Retail Amendment (Introduction of Metering Coordinator Planned Interruptions) Rule 2020*.
2. Vector acknowledges the AEMC's direct engagement with stakeholders on this proposal through a workshop via teleconference on 20 April 2020. This submission responds to the questions in the AEMC's presentation at the workshop that are relevant to the operations of Vector's advanced metering business (Vector Metering) in Australia.
3. In our view, following the first submission process and the 20 April workshop, the AEMC's draft rule remains contentious and, in its current form, does not have the widespread support of stakeholders. As such, and in the context of the re-prioritisation of the AEMC's and other energy regulators' work programmes due to COVID-19, we suggest that the AEMC defer further consideration of this proposal and instead include it in the review of the metering market, three years following the introduction of competition in metering in the National Electricity Market (NEM).
4. No part of this submission is confidential. Vector's contact person for this submission is:

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Responses to selected consultation questions

Alternative installation timeframes

Q1: 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?

5. Yes. Vector notes that extended timeframes for "Family Failures" are already accommodated under section 7.8.10 of the *National Electricity Rules* (Family Failures are considered as "Malfunctioning" meters). This already allows for longer timeframes where the Metering Coordinator has been granted an exemption by AEMO (clauses 7.8.10(a) and 7.8.10(aa)).

The AEMC's proposed rule changes do not have an impact on these clauses. Should the proposed changes be adopted, no further changes are required to support extended timeframes for Family Failures and meter malfunctions.

Q2: 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?

6. Yes. Existing conventions prioritise urgent essential work over non-essential work. These should be maintained.

Q3: Should customer choice of meter installation date be included in the rules, consistent with the meter installation timeframes where there is single fusing? What are the complexities of customer choice with shared fusing?

7. Yes. The rules also need to allow for negotiation of the agreed date with all customers affected by the interruption, not just the customer who required the meter exchange. There will be many situations where customers will need to compromise with their neighbours on the date for the interruption. It is likely that there will be many situations where the negotiated timing of an interruption will fall outside mandated timeframes and will therefore need to be accommodated in any new rule.

Extending implementation timeframes to allow for system changes

Q1: What system changes or process changes are required to meet the additional meter installation timeframes where shared fusing is discovered?

8. From a Metering Provider perspective, new processes are required to advise distribution network service providers (DNSPs) of the presence of a shared fuse at a premise. Should the AEMC require the rule to take effect before formal B2B transactions can be developed, this information will need to be provided to DNSPs using interim procedures (by email). It is anticipated that reports will need to be developed and run regularly to extract the affected sites in each DNSP's jurisdiction. The contents of these reports will be emailed to each DNSP who, in turn, will need new processes to capture this information.

Q2: 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)?

9. It is unclear in the draft rule determination whether the AEMC intends for shared fusing information to be available in the Market Settlement and Transfer Solutions (MSATS) or whether it is only the DNSP that is required to keep a register. The proposed rule, as currently drafted, requires the Australian Energy Market Operator (AEMO) to change the metrology procedure to require DNSPs to record this information in their systems but is unclear whether it requires this information to then be made available to other participants via MSATS.
10. The changes required for DNSPs to store data in their systems should be minimal, however, changes required to have the data populated in MSATS will be much more substantial and will impact most market participants. Any changes to MSATS will require broad consultation, followed by AEMO procedure changes, then an IT programme of work for AEMO and market participants to alter existing market transactions and data repositories.

Q3: Are there certain requirements under the draft rule where more time is needed?

11. It is clear from the 20 April workshop that there are still material issues that need to be addressed for this rule change to deliver its intended benefits. These include:
 - a. the lack of formal market transactions to support the exchange of new information;
 - b. availability and timeliness of information so that the benefits anticipated from the draft rule can be realised; and
 - c. whether prior knowledge of a site's shared fuse status will reduce the number of site visits.
12. Existing market processes, while cumbersome and expensive, do work and customers at shared fused sites are getting meters exchanged. Vector recommends that further consideration of this rule change be deferred due to:
 - a. the current issues and challenges facing the industry due to COVID-19;
 - b. the outstanding issues identified above; and
 - c. the lack of widespread support for the draft rule from stakeholders.
13. We recommend that the proposed rule change be included in the scope of the upcoming review of the metering market, three years following the commencement of the *Competition in Metering Rule* in the NEM under the *Power of Choice* reforms.

Q4: What other system changes and / or other situations (for example COVID-19) may impact implementation timeframes?

14. See our response above (Q3). Should the rule change require formal B2B transactions to meet the new requirements, an Information Exchange Committee (IEC) consultation process will need to be undertaken. The next B2B change is scheduled for November 2021, reflecting the earliest date that changes to B2B can be adopted, as deemed by the industry.
15. Any required changes to MSATS should be incorporated into AEMO's current MSATS Standing Data Review project, which has an indicative commencement date of 2022.

Recording shared fusing site information

Q1: 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?

Q2: 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?

16. As a Metering Provider, we do not believe that having prior knowledge of a shared fuse scenario guarantees that a meter exchange will be successful. Approximately 15-20% of attempts to perform a meter exchange are unsuccessful due to valid reasons/issues that are beyond the control of the Metering Provider. The customer's attention is required for the resolution of these other issues, e.g. non-compliant board, no room on panel, friable asbestos, or obstruction.
17. By engaging the DNSP before it can be confirmed that the meter can successfully be exchanged, the Metering Provider risks being charged a wasted truck fee by the DNSP. To avoid this cost, we believe Metering Providers will still be required to visit the site (the alleged benefit of recording this information) ahead of booking the DNSP to determine all other issues that require resolution before the meter can be exchanged. It is our view that the while

the costs of requiring this information to be captured are apparent, the benefits have yet to be proven. As such, these requirements should not be imposed until their benefits can be clearly demonstrated.

Concluding comment

18. We are happy to provide further information or discuss any aspects of this submission with the AEMC.

Yours sincerely



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