Australian Energy Market Commission

RULE CHANGE

CONSULTATION PAPER

National Electricity Amendment (Metering Installation Timeframes) Rule 2018

National Energy Retail Amendment (Metering Installation Timeframes) Rule 2018

Rule Proponents

The Hon Josh Frydenberg MP
Australian Energy Council

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About the AEMC

The AEMC reports to the Council of Australian Governments (COAG) through the COAG Energy Council. We have two functions. We make and amend the national electricity, gas and energy retail rules and conduct independent reviews for the COAG Energy Council.

Contents

1 Introduction

The Australian Energy Market Commission (AEMC or Commission) has received the following rule change requests:

1. On 5 March 2018, the Hon Josh Frydenberg MP, Minister for the Environment and Energy, submitted a rule change request to require that electricity retailers use their best endeavours to either provide small customers with a metering installation on a date agreed with the customer, or where no date is agreed, within six business days after the customer has met necessary preconditions.

2. On 5 May 2018, the Australian Energy Council (AEC) submitted a rule change request to:

    (a) extend the timeframes in which faulty electricity meters must be replaced from ten days to 20 days, in recognition of the processes involved

    (b) allow electricity retailers to give customers less than four business days' notice of a planned outage, where the customer agrees

    (c) allow customers to opt out of the written notification requirements involved in a retailer led deployment of advanced meters

    (d) address several other issues related to planned interruption notices.[1]

These rule change requests seek changes to the National Electricity Rules (NER) and the National Energy Retail Rules (NERR) to address issues related to metering installation timeframes. The Commission has consolidated the rule change requests in order to streamline the consultation process for stakeholders.

This consultation paper has been prepared to facilitate public consultation on the consolidated rule change requests and to seek stakeholder submissions.

This paper:

- sets out a summary of, and a background to, the rule change request
- identifies a number of questions and issues to facilitate the consultation on this rule change request
- outlines the process for making submissions.

1 These include: removing the application of the planned interruption notification provisions to large customers; and only requiring the retailer to provide a telephone number for enquiries about planned interruption notices during business hours, and not 24 hours.

2 Background

2.1 Competition in metering

On 1 December 2017, new rules commenced that introduced a competitive framework for metering services. The *Expanding competition in metering and related services* final rule (competition in metering) sought to facilitate a market-led deployment of advanced meters. Consumers would be able to drive the uptake of advanced meters, and innovation, through their choice of new products and services. It also allows other participants such as retailers to roll out advanced meters where they can see benefits from the services provided (such as remote meter reading). The competition in metering rule involved significant amendments to the NER and NERR.

2.1.1 Types of electricity meters

Accumulation meters (type 6 meters) are the most common form of meter in the National Electricity Market (NEM) and perform only basic metering functions. Accumulation meters record the amount of electricity used, but not the time it was used. The customer is billed based on the difference between meter reads. As a consequence, customers are often on a flat rate for electricity, may receive an estimated meter read if an actual meter read cannot occur, and have limited understanding of their energy usage patterns or ability to manage usage to reduce their bills.

Interval meters (type 5 meters) take more detailed measurements of electricity usage (every 30 minutes) and store that data on the meter until it can be manually collected. Interval meters can support some services for customers, such as different tariff arrangements, but do not have communications functionality to be remotely read and controlled. Therefore there is limited ability for customers with type 5 meters to understand and manage their electricity usage in real time.

Advanced meters (type 4 meters), and the products and services enabled by those meters, give customers greater choice and control. From 1 December 2017, all new metering installations and replacement meters must be an advanced meter that is capable of providing a set of minimum services,[2] although there is nothing to prevent advanced meters including functionality for other services if there is demand for those services. A competitive roll out of advanced meters will mean that advanced meters will be provided at a lower cost to consumers compared with a mandatory roll out, as advanced meters will only be installed where it is cost efficient to do so.

2 The required minimum services specification for advanced metering installations is set out in Schedule 7.5 of the NER and includes: remote disconnection; remote re-connection; remote on-demand meter read; remote scheduled meter read; metering installation inquiry; advanced meter reconfiguration.

2.1.2 Consumer benefits of advanced meters

Advanced meters are expected to provide consumers with the following benefits:

- **Better information**: advanced meters can provide more granular information and price signals to better enable customers to make decisions about how and when to use electricity, and allow them to change their behaviour to lower costs. Customers could use a third party service such as an app or in-home display to see real-time information about their electricity usage.

- **Cost reflective pricing**: advanced meters can support different tariff structures. In addition to a flat tariff structure, customers may be able to choose from time-of-use or demand pricing structures or various forms of rebates to enable the customer to reduce its bill by moving its electricity usage to off peak times. This can also help distributors defer expensive augmentations to the network that are otherwise necessary to accommodate peak demand.

- **New products and services**: the competition in metering rule supports the development of a market for new innovative products and services. One example is an in-house display that uses the live consumption data from the advanced meter to provide consumers with detailed analytics about the appliance usage and associated costs. Another example is a load management product that enables a third party to control certain parts of the customer's load (such as an air conditioner or pool pump) in return for an incentive.

- **Better retail service**: retailers are expected to offer more innovative pricing, product and service options for consumers. Advanced meters will also enable retailers to disconnect and reconnect their customers quickly, for example when they move house. The ability to remotely read meters will also facilitate quicker customer transfers, as well as giving customers more possibilities to reduce bill shock, for example through monthly or weekly billing arrangements if agreed to by the customer.

- **Better network service:** the information provided by advanced meters can give distributors a better picture of electricity consumption patterns and enable them to make more efficient network investment decisions. Also as mentioned above, demand management and other products may be able to help reduce peak demand and defer or avoid expensive network augmentations. This would benefit all consumers through lower network costs.

2.1.3 Implementation

The competition in metering final rule determination was published on 26 November 2015. Since then, a significant industry-wide implementation program has been underway to prepare for commencement of the reforms. This included:

- Australian Energy Market Operator (AEMO) amending the relevant procedures

- Australian Energy Regulator (AER) developing ring-fencing guidelines for distributors to provide competitive services
- AEMO developing a registration process for metering coordinators
- retailers and distributors amending their standard contracts for customers
- businesses and AEMO updating their systems and internal processes.

An industry-wide program of this scale comes with risks, including challenges in completing system changes and arranging commercial agreements in time for commencement, as well as managing customer risks associated with new connections, transfers, faults and emergencies. To identify and mitigate these risks, AEMO and market participants worked together intensively through a formal process, which included monthly industry readiness reporting and undertaking monitoring and reporting of industry risks.

One strategy adopted to manage customer risks was the introduction of an optional staged approach for retailers to take on responsibility for new connections and faults, in situations where customer supply was at risk. Under the staged approach, retailers would have an additional four months, until 31 March 2018, for metering responsibility to transfer from distribution businesses to metering coordinators. This provided retailers and metering coordinators with additional time to ensure their systems were in place to manage the new responsibilities. However, it has meant that the installation of replacement meters has been slow to ramp-up and some customers have experienced delays.

Since 1 December 2017, approximately 100,000 advanced meters have been installed across the NEM, excluding Victoria. A significant portion of the installations have occurred since the transition period ended on 31 March 2018. A large number of advanced meters were also installed during the transition to the new rules, with a total of over 500,000 advanced meters having been installed outside of Victoria since the competition in metering rules were made in November 2015.

AEMO and the AER are continuing to work with industry members to adjust to the new metering roles and responsibilities. In addition, the rule proponents have identified some potential opportunities to improve the meter installation processes to be investigated through this rule change process.

As a result of a separate government-mandated rollout under the advanced metering installation (AMI) program, almost all Victorian consumers already have advanced meters that were installed by distributors. The Victorian government has made significant derogations from the metering provisions in the NER, with the result that key changes that were made in the competition in metering rule do not apply in Victoria and metering services continue to be provided by distributors as a regulated monopoly service. In addition, the NERR do not apply in Victoria. As part of the assessment of this rule change request, the Commission will need to consider which, if any, aspects of the proposed changes to the NER are relevant in Victoria.

2.2 Metering roles and responsibilities

The competitive framework for metering services was introduced by transferring the metering related roles and responsibilities in the NER, previously held and carried out by the distributor (in its role as the 'responsible person'), to a new type of registered participant; the metering coordinator. This ended the effective monopoly of distributors over metering arrangements and allowed any party that meets the registration requirements to become a metering coordinator.

The metering coordinator carries out all of the roles that were previously carried out by the responsible person[3] as well as additional responsibilities around the security of, and access to, advanced meters so the services they provide are appropriately managed. An overview of the new roles and responsibilities of market participants is provided below and in figure 2.1, while background to specific issues raised by the rule proponents, including issues with parts of the NERR, is provided in chapter 5.

2.2.1 Retailer

Under the NER, the entity responsible for arranging metering services is the financially responsible market participant (FRMP). For small customers (residential and small business customers) this is typically the retailer.

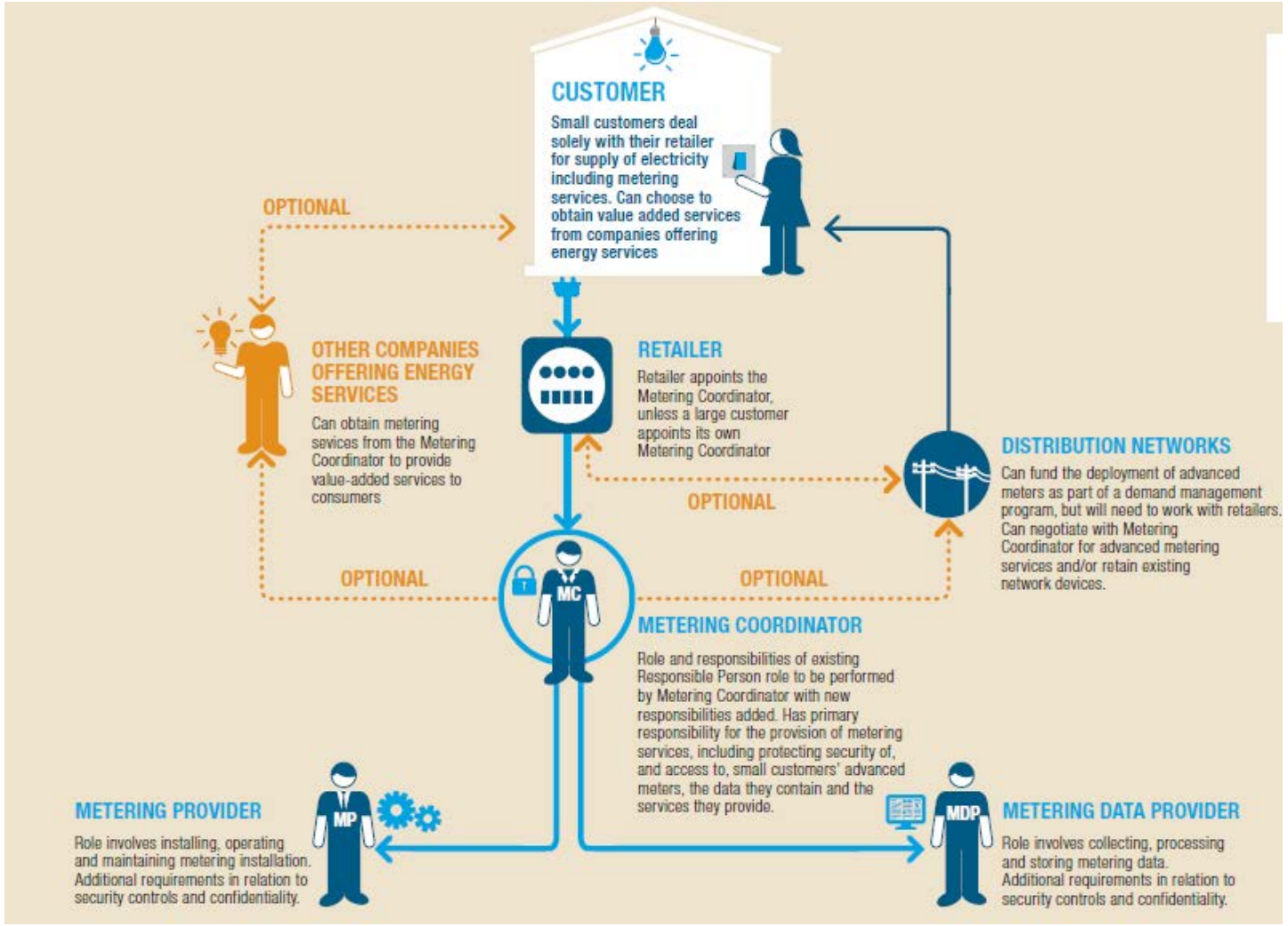
Retailers must appoint a metering coordinator for each of their customer's connection points[4] and obtain a national metering identifier (NMI) for each meter.[5] In general, the retailer provides instructions to the metering coordinator for any metering work needed by the customer.

3 Under the NER prior to 1 December 2017, the responsible person was responsible for the installation and maintenance of a metering installation, and the collection, processing and delivery of metering data. Among other things, the responsible person would engage a metering provider and metering data provider to carry out these tasks. The responsible person was the local network service provider (distributor) for customers with type 5 and 6 metering installations. Either a market customer (such as a retailer) or distributor could be the responsible person for customers with type 4 metering installations.

4 Clause 7.2.1(a) of the NER. Under clause 7.6.2(a)(3) a large customer may appoint its own metering coordinator.

5 Clause 7.8.2(c)(1) of the NER. This involves applying to the distributor for a NMI and providing it to the metering coordinator within five business days of receiving it.

Figure 2.1 Metering roles and responsibilities



2.2.2 Metering coordinator, metering provider and metering data provider

The metering coordinator has overall responsibility for all issues related to the metering installations for which it has been appointed. The metering coordinator appoints a metering provider for each connection point to provide, install and maintain the metering installation.[6] The metering coordinator also appoints a metering data provider who is responsible for the collection and processing of metering data.

Any person can perform one or more of these three metering roles provided that they are registered and accredited by AEMO for the relevant roles. In practice, most metering coordinator businesses are also registered and accredited as metering providers and metering data providers.

With regard to the timeframes required of the installation process, the metering coordinator must arrange for a faulty meter to be repaired within ten business days of being notified of the malfunction.[7]

2.2.3 Distributor

As mentioned above, the distributor's previous roles of providing metering services for small customers are now carried out by the metering coordinator. However, as a transitional arrangement the distributor is the metering coordinator (and metering provider) for existing type 5 and 6 manually read metering installations, until the meter is replaced and the retailer appoints a new metering coordinator and metering provider.[8]

The distributor is also responsible for the connection process for customers. While the installation of a meter is a necessary part of the connection process, it is no longer carried out by, or the responsibility of, distributors. The connection process for small customers is set out in Chapter 5A of the NER and does not impose any requirements for the timeframes involved in completing the physical work needed for a new connection.

Some jurisdictions impose customer service standards on electricity distributors that include timeframes for new connections. For example:

- In Victoria the distributor must use its best endeavours to connect new supply on the date agreed with the customer, or otherwise must connect supply within ten business days of the request.[9]
- In South Australia the distributor must use its best endeavours to connect new supply on a date agreed with the customer, or otherwise within six business days of the customer meeting the necessary preconditions.[10]

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6 Clauses 7.3.2(a) and 7.8.1(c) of the NER.

7 Clause 7.8.10(a)(2) of the NER. Another timeframe imposed, although not impacting the installation timeframes, is that the metering coordinator must provide AEMO with the details of the metering installation within ten business days of receiving the NMI from the retailer. See clause 7.8.2(e) of the NER.

8 Clause 11.86.7 of the NER.

9 Essential Services Commission Victoria, Electricity Distribution Code, Version 9 December 2015, section 2.2.

2.3 Scenarios for installing or replacing meters

The Commission is aware that there are different scenarios for installing or replacing a meter. These scenarios may involve slightly different processes, and therefore timeframes in which they can be completed. For example:

- New connections: This can involve the installation of a meter at a new connection point that may be a single premises, or multiple premises that require a meter for each customer.
- Faults and malfunctions: A meter can malfunction in many different ways, but generally results in one of two outcomes for the customer:
  - the malfunction results in no electricity supply to the premises. This has significant impacts on the customer, but we understand that such a loss of supply as a result of a malfunctioning meter occurs very rarely, if ever
  - the customer has electricity supply, but the meter is not recording electricity usage accurately or at all. This affects the accuracy of data provided for settlement of the NEM.
- Replacements: An otherwise operational meter may be upgraded or replaced in some circumstances. For example:
  - a customer organises access to energy services (such as a home energy management system) that are not supported by the existing meter
  - a customer installs solar panels, batteries, or other technology that cause bidirectional flows to the network, and the customer needs a new meter in order to benefit from feed-in-tariffs from the export of this energy to the network
  - a customer installs a power-intensive device (such as air conditioning) that requires upgrading from single phase to three phase supply
  - the meter is nearing the end of its life and is due for maintenance replacement
  - the retailer chooses to deploy a fleet of new meters to its customers to benefit from the efficient functions provided (such as remote meter reading).

Through the consultation process the Commission is seeking feedback on the processes for installing or replacing an existing meter with an advanced meter, and the timeframes involved in each of these processes, including whether any of the processes are significantly different to the others.

10 Essential Services Commission South Australia, Electricity Distribution Code, Version 12.1 January 2018, section 2.3.1(b). The necessary preconditions are not defined in the Electricity Distribution Code.

2.4 Retailer planned interruptions

The competition in metering final rule is expected to result in the more widespread deployment of advanced meters. Therefore the rule change addressed not only the metering roles and responsibilities to provide basic metering services outlined above, but also made changes so that consumers continued to receive appropriate consumer protections under these new arrangements. One of these was to allow retailers to initiate planned interruptions for their customers, to enable metering work to occur, but only if the customer received prior notice of the interruption.

Under the NERR, retailers are able to arrange for an interruption to their customer's electricity supply without the involvement of the distributor (a retailer planned interruption) where the interruption:[11]

- is for the purposes of installing, maintaining, repairing or replacing an electricity meter; and
- does not involve interrupting supply of electricity to a customer that is not the customer of the retailer arranging the interruption.

The retailer must notify affected customers of the retailer planned interruption at least four business days before the date of the interruption. Retailers must also notify the distributor at least four business days before a retailer planned interruption, including with details of the NMI and address of the premises affected by the interruption.[12] Where a retailer planned interruption cannot be undertaken, the distributor must assist with the interruption to enable the metering work to occur, such as carrying out a distributor planned interruption. The metering coordinator must assist the distributor with any information it needs to notify the customer of the distributor planned interruption.[13]

If the retailer is carrying out a new meter deployment,[14] the retailer planned interruption notice may be combined with the second notice that the retailer is required to provide to the customer regarding the meter deployment and the customer's right to opt-out of that deployment.[15]

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11 Rule 59B of the NERR. A retailer planned interruption does not include de-energisation for non-payment or other reasons specified under Part 6 of the NERR.

12 Rule 99A of the NERR.

13 Rules 90 and 91A of the NERR.

14 A new meter deployment is the replacement of an existing electricity meter which is arranged by the retailer, where the replacement is not: at the request of the customer to enable the provision of a product or service; a maintenance replacement; or as a result of a metering malfunction. The requirement on retailers to notify customers of a new meter deployment is set out in rule 59A of the NERR.

15 Clause 59C(3) of the NERR.

3 Details of the rule change requests

This chapter summarises the issues raised by the rule proponents and the proposed solutions.

The Commission encourages readers to review the copies of the rule change requests published on the AEMC website.[16]

3.1 Delays in the installation of new and replacement meters

In his rule change request, Minister Frydenberg noted that "since the commencement of the new rules, the Australian Government has become aware of complaints from small customers relating to delays in receiving new meters".[17] He noted that, while there are timeframes regarding the replacement of malfunctioning meters, there are no requirements regarding timeframes to install meters in other circumstances, such as a new connection or where a customer is seeking an upgraded meter to access new services.

The Minister is concerned with the negative impacts of installation delays on small customers. For new connections, delays mean the customer is unable to access electricity. For replacement meters, the customer is unable to access new products and services until the upgrade is complete, resulting in a poor customer experience and potentially slowing the deployment of advanced meters. Where the new services allow customers to reduce their energy bills, the Minister expresses a concern that installation delays may result in higher bills than necessary.

To address this issue, the Minister proposed the following solutions:

1. Amend the NER to require the retailer[18] to use its best endeavours to provide a metering installation on a date agreed with the customer, or otherwise within six business days after the customer has met the necessary preconditions. Preconditions could include the following:

    (a) the retailer has received a formal request from the customer for the new or replacement meter

    (b) an electrician has confirmed the site is safe and ready for the metering installation

    (c) the distributor has advised that installation can proceed

    (d) the customer agreement with the retailer is in place.

16 www.aemc.gov.au/rule-changes/metering-installation-timeframes.

17 Minister Frydenberg, Rule change request, *Metering installation timeframes*, p. 2.

18 The obligation would be placed on the retailer in their role as the financially responsible market participant (FRMP) for the customer's connection point.

2. Amend the NERR such that for standard and market retail contracts, the retailer must inform the small customer of its rights in relation to:

   (a) the timing of the metering installation requirements under the rules

   (b) accessing the retailer's dispute resolution procedures

   (c) lodging a complaint with the relevant energy ombudsman.

The rule change request was silent on whether the proposal would apply to the replacement of malfunctioning meters. However, the Commission understands that it is only intended to operate in situations where installation timeframes do not currently apply, such as for new connections and meter upgrades.

The Minister noted that there may be circumstances in which a retailer, regardless of its best endeavours, is unable to meet an installation timeframe. This might include extreme weather events, meter accessibility issues, or safety issues with the metering installation (for example if there is asbestos). In these circumstances the installation may not be able to proceed until the situation is rectified. The best endeavours requirement on the retailer is intended to acknowledge these situations.

The Minister also suggested that in considering the impacts of a defined timeframe, the AEMC should consider any safety impacts. He noted that a proposed timeframe should not impact the ability of metering providers to comply with jurisdictional safety requirements, and to install meters safely.

The rule change request did not include a proposed rule.

The Minister considered these changes would:[19]

- provide greater certainty to customers about the timeframes for the provision of metering services
- provide discretion to the AER in determining the situations where retailers have used their best endeavours to provide metering services but have not been able to meet these timeframes for reasons outside their control[20]
- ensure customers have information about their rights with respect to metering services and their options for resolving disputes.

The Minister considered it preferable that these obligations are placed on retailers, instead of metering coordinators and metering providers. He considered that this would ensure retailers are accountable to their customers for meeting installation timeframes and that retailers would be able to manage these requirements in their commercial relationships with metering businesses.

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19 Minister Frydenberg, Rule change request, *Metering installation timeframes*, p. 4.

20 The Minister noted that a retailer's ability to comply with installation timeframes could be affected by, for example, extreme weather events, access to and safety of the installation site, or other rule requirements such as de-energisation restrictions in protected periods (see rules 108, 116(1) and 120(1) of the NERR).

3.2 Timeframes for replacing a faulty meter

In its rule change request, the AEC raised the concern that some of the obligations that were transferred from distributors to retailers and metering coordinators in the competition in metering final rule are taking longer to complete now that more participants are involved in the installation process. While previously the distributor carried out all tasks, the retailer must now appoint a metering coordinator and metering provider and coordinate the tasks.

Specifically, the AEC noted the difficulty in replacing a faulty or malfunctioning meter within the required ten day period, given the following tasks must occur after the metering coordinator is appointed to the site:[21]

- The metering coordinator appoints the metering provider in MSATS (which includes an objection period).
- The metering coordinator sends a meter exchange request to the metering provider and the metering provider actions this request.
- The retailer provides a planned interruption notice to the customer, which requires at least four business days' notice. Electronic communication can provide this notice immediately, but communication by post may take an additional two (metro) to six (regional) business days.
- The metering provider repairs or replaces the meter.

To address this issue, the AEC proposed that the existing requirement to repair a faulty meter within ten business days be extended to 20 business days (as well as other changes discussed below).

The rule change request included proposed changes to rule 7.8.10 of the NER.

The AEC considered that extending this timeframe would not affect the service being provided to customers. Rather, it would reflect the practical steps and required timeframes for replacing a faulty meter and provide retailers and metering coordinators with a reasonable opportunity to comply with the rules.

3.3 Timeframes for planned interruption notices

The AEC is concerned that the requirement for retailers to provide at least four days' notice of a planned interruption is inflexible and in some circumstances can cause unnecessary delays in the installation process. For example, under the existing rules, if a metering provider is in an area completing a number of installations and gains some additional time (for example if a customer cancels an installation) it is unable to schedule another job in that area at short notice, even if it is convenient for the

21 See p. 6 of the Australian Energy Council rule change request for a full table of tasks and timeframes involved to replace a faulty meter.

customer. Also, to re-schedule a cancelled job, the retailer would need to provide that customer with another four days' notice.[22]

The AEC noted that while this requirement was previously placed on distributors under the NERR, some flexibility was provided through derogations that were made by jurisdictional governments. For example, in New South Wales and Queensland, distributors were able to seek customer agreement in writing to interrupt supply within the four day notice requirement. In addition, distributors were able to interrupt supply without notice where there was an emergency or safety issue for unplanned maintenance.[23]

To address this issue, the AEC proposed that the rules should allow customers (including life support customers) to agree with their retailer an alternative date for a planned interruption, even if this falls within the minimum four day notification period.

The rule change request included proposed changes to rule 59C of the NERR.

The AEC considered the proposed change would give customers greater flexibility and control over the timing of planned interruptions, which ti considered to be particularly important for life support customers. It would also enable meters to be installed in a more timely and efficient manner, ultimately lowering costs for the industry and consumers.

3.4 Customer engagement in advanced meter deployment

Rule 59A of the NERR sets out the requirements for retailers deploying new meters for small customers. The retailer must notify the customer of the new meter deployment and provide the customer with the opportunity to opt-out. This occurs twice: once during the period of 25 to 60 business days before the intended replacement; and again during the period of at least ten business days after the first notice and at least 15 business days before the intended replacement.[24]

The AEC noted that a retailer must follow this notification process, unless the customer has a market contract with the retailer that waives the obligation for a retailer to follow this notification process. The AEC considered this process to be inflexible, as the notification process must be followed even if the customer provides explicit consent to the new meter deployment after the first notice. The AEC is concerned that customers may be confused by the second opt-out notification where they provide consent to the new meter deployment after the first notification.[25]

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22 In addition, under the existing NERR if the customer requests an installation date beyond the four day notice period, this may breach the requirement for the metering coordinator to replace a faulty meter within ten business days.

23 AEC, rule change request, *Meter installation - planned interruptions*, p. 4.

24 Clause 59A(2) of the NERR.

25 AEC, Rule change request, *Meter installation - planned interruptions*, p. 7.

To address this issue, the AEC proposed that a customer should be able to agree to the new meter deployment at a time of their choosing, and waive the notification process. As a result, the retailer would not need to comply with the notification requirements set out in rule 59A of the NERR.

The rule change request included proposed changes to rule 59A of the NERR.

The AEC considered this change may help to reduce customer confusion with the new meter deployment process and allow customers to choose how they will be engaged. It may also reduce the administrative costs associated with sending multiple letters to customers.

3.5 The 24 hour phone enquiry line for planned interruption notices

The AEC raised the issue that there are currently several requirements for retailers and distributors to provide 24 hour phone lines in the case of outages, including:

- Under rule 124 of the NERR, life support customers are provided with a 24 hour emergency telephone contact number for the distributor. From 1 February 2019 life support customers must also be provided with a 24 hour emergency telephone contact number for the retailer.[26]

- Under rule 59C of the NERR, a retailer must provide customers with a 24 hour telephone number for enquiries related to planned interruption notices.

While the AEC considers an emergency phone line for life support customers to be appropriate and necessary, it does not consider it necessary to provide a 24 hour phone line for other customers. This is because enquiries to the retailer about planned interruptions are likely to be from customers seeking more information about the outage or wanting to change the appointment time, rather than about emergency issues. The AEC considers these types of enquiries are best addressed during business hours and providing a 24 hour phone line provides limited additional benefits.[27]

The AEC proposed that retailers should only be required to provide a telephone number for enquiries about planned interruption notices during business hours, and not a 24 hour phone line.

The rule change request included proposed changes to rule 59C of the NERR.

The AEC noted that this would not impact the requirement for planned interruption notices for life support customers to include an emergency telephone contact number for the retailer and distributor, which would be provided 24 hours a day. The distributor would also continue to provide a 24 hour contact number for all customers for unplanned outages.

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26 This requirement will commence on 1 February 2019 under the National Energy Retail Amendment (Strengthening protections for customers requiring life support equipment) Rule 2017.

27 AEC, Rule change request, *Meter installation - planned interruptions*, pp. 7-8.

The AEC considered this change would reduce customer confusion around the purpose and function of the retailer enquiry phone line and an emergency phone line. It considered that customer satisfaction may improve if customer enquiries about planned interruptions are able to be addressed immediately during business hours. The proposal would also reduce the costs for retailers of maintaining a 24 hour phone line for planned interruption notices.

3.6 Planned interruption notices for large customers

Under rule 59C of the NERR, retailers must provide planned interruption notices to large customers as well as small customers.

The AEC considered the planned interruption notification provisions provide limited benefit to large customers. It noted that most large customers have current transformer (CT) connections and do not experience an outage when the meter is being maintained or replaced. As information about which connections are CT connections is not available to the retailer in MSATS, retailers must assume that metering work at any large customer site will cause an outage for the large customer, and must therefore provide a planned interruption notice.

To address this issue, the AEC has proposed to remove the requirement to provide planned interruption notices to large customers. Instead, retailers would only be required to provide planned interruption notices to small customers.

The rule change request included proposed changes to rule 59C of the NERR.

The AEC claimed that meter replacement for large customer sites did not have any issues prior to the commencement of rule 59C in the competition in metering rule. It also considered that removing these requirements would reduce the administrative costs of the notification process for retailers.[28]

28 AEC, Rule change request, *Meter installation - planned interruption*, p. 8.

4 Assessment framework

The Commission's assessment of these rule change requests must consider whether the proposed rule promotes, as appropriate, the National Electricity Objective (NEO) and National Energy Retail Objective (NERO).

4.1 Rule making test

4.1.1 Achieving the NEO and NERO

Under the National Electricity Law (NEL) the Commission may only make a rule if it is satisfied that the rule will, or is likely to, contribute to the achievement of the national electricity objective (NEO).[29]

The NEO is:[30]

> "To promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to -
>
> (a) price, quality, safety, reliability and security of supply of electricity; and
>
> (b) the reliability, safety and security of the national electricity system."

Under the National Energy Retail Law (NERL), the Commission may only make a rule if it is satisfied that the rule will, or is likely to, contribute to the achievement of the national energy retail objective (NERO).[31]

The NERO is: [32]

> "to promote efficient investment in, and efficient operation and use of, energy services for the long term interests of consumers of energy with respect to price, quality, safety, reliability and security of supply of energy."

The Commission must also, where relevant, satisfy itself that the rule is "compatible with the development and application of consumer protections for small customers, including (but not limited to) protections relating to hardship customers" (the "consumer protections test").[33]

Where the consumer protections test is relevant in the making of a rule, the Commission must be satisfied that both the NERO test and the consumer protections

29 Section 88 of the NEL.

30 Section 7 of the NEL.

31 Section 236(1) of the NERL.

32 Section 13 of the NERL.

33 Section 236(2)(b) of the NERL.

test have been met.[34] If the Commission is satisfied that one test, but not the other, has been met, the rule cannot be made.

There may be some overlap in the application of the two tests. For example, a rule that provides a new protection for small customers may also, but will not necessarily, promote the NERO.

4.1.2 Making a more preferable rule

Under s. 91A of the NEL and s. 244 of NERL, the Commission may make a rule that is different (including materially different) to a proposed rule (a more preferable rule) if it is satisfied that, having regard to the issue or issues raised in the rule change request, the more preferable rule will or is likely to better contribute to the achievement of the NEO and NERO (respectively).

4.1.3 Northern Territory

From 1 July 2016, the NER, as amended from time to time, apply in the Northern Territory, subject to derogations set out in Regulations made under the Northern Territory legislation adopting the NEL.[35] Under those Regulations, only certain parts of the NER have been adopted in the Northern Territory.[36] As the proposed rule relates to parts of the NER that currently do not apply in the Northern Territory, (that is chapter 7 of the NER), and any consequential changes to other chapters of the NER will have no practical effect in the Northern Territory (for example if transitional arrangements were introduced under Chapter 11 of the NER), the Commission does not consider that the proposed rule needs to be assessed against additional elements set out under the Northern Territory legislation.[37]

4.2 Proposed assessment framework

To determine whether the proposed rules would be likely to promote the NEO and NERO, the Commission will assess the rule change requests against an assessment framework. The framework may be refined during the rule change process.

The relevant considerations in the above objectives are the promotion of efficient investment and operation of energy services for the long term interests of consumers of electricity with respect to prices.

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34 That is, the legal tests set out in s. 236(1) and (2)(b) of the NERL.

35 National Electricity (Northern Territory) (National Uniform Legislation) (Modifications) Regulations 2017.

36 For the version of the NER that applies in the Northern Territory, refer to: www.aemc.gov.au/regulation/energy-rules/national-electricity-rules-northern-territory.

37 See section 14A of Schedule 1 to the National Electricity (Northern Territory) (National Uniform Legislation) Act 2015, inserting section 88(2a) into the NEL as it applies in the Northern Territory and section 14B of Schedule 1 to the National Electricity (Northern Territory) (National Uniform Legislation) Act 2015, inserting section 88AA into the NEL as it applies in the Northern Territory.

The rule change requests suggest a number of options that may improve the speed and customer experience with respect to meter installation and replacement. It is argued that this will improve consumer access to new services supported by advanced meters and improve customer experience through increased certainty around timeframes and access to information. It is also argued that the proposed changes will increase efficiency and therefore reduce costs.

At this stage, the Commission is seeking stakeholder views on its proposed assessment framework which includes the following criteria to assess whether the proposed rule is likely to promote the NEO and NERO, namely the impact the rule has on:

- **Efficient use of energy**: Currently, customers who cannot get timely installation of an advanced meter may miss out on benefits from new services that can help customers manage their energy use and costs, and may lose confidence in participating in such services. The Commission will consider whether the proposals put forward by the rule proponents may help to improve this.
- **Efficient provision of energy services**: Current metering obligations may result in retailers undertaking inefficient processes leading to consumers bearing higher costs. In addition, delays in the installation of advanced meters may adversely affect the development of the energy services market. The Commission will consider whether the proposals put forward by the rule proponents may help to address these issues.
- **Consumer protection**: Currently, customers seeking installation of new advanced meters have limited certainty or control over the timing of their installation. The Commission will consider whether the proposals put forward by the rule proponents may improve this. Other changes put forward by the rule proponents may improve the efficiency of the meter installation process and reduce costs for retailers and metering businesses, but in doing so may reduce the consumer protections in the rules and adversely impact on consumers. The Commission will consider the impacts of the proposed changes on consumer protections, including whether the proposed changes are consistent with the consumer protections test in the NERL.
- **The regulatory and administrative burden**: The Commission intends to consider the benefits of the proposed rule changes against the implementation costs. Some or all of the implementation costs would likely be passed through to consumers in a workably competitive market. If implementation costs are significant, they may also adversely affect the deployment of advanced meters. Retailers may be unwilling to absorb those costs and may therefore deploy fewer advanced meters, unless required to for a new connection or to replace a faulty meter. Also customers may be unwilling to pay additional costs that are passed through and may instead elect to retain their existing manually read meters for longer.

The proposed rules will be assessed against the relevant counterfactual of not making the proposed changes. That is, against the current arrangements with regard to meter installation and replacement, notification obligations and telephone support for life support customers.

5 Issues for Consultation

Taking into consideration the assessment framework, a number of issues have been identified for initial consultation. Stakeholders are encouraged to comment on these issues as well as any other aspect of the rule change request or this paper, including the proposed assessment framework.

5.1 Requirements for meter installation timeframes

As discussed in chapter 2, there are currently few requirements regarding the timeframes in which electricity meters must be installed. The notable exception is the requirement for a metering coordinator to arrange for the repair or replacement of a faulty meter within ten business days of being notified of the malfunction.[38]

The principle that appears to underlie the current approach in the NER is that a timeframe is imposed where there is a malfunctioning meter due to the material impact on:

- settlement: if the meter is not recording electricity flows to the customer there will be a mismatch between usage across the NEM and metered usage, which affects the accuracy of settlement data
- the customer: where the faulty meter causes a supply outage, although we understand that faulty meters will rarely, if ever, result in supply outages.

In other situations where a new or replacement meter is being installed, there are no specified timeframes in which retailers and metering businesses must complete the installation. While some jurisdictional service standards on distributors include timeframes for the connection process (that is, for new supply), this has no bearing on the retailer or metering business with regard to the metering installation.

The rule proponents have suggested changing the timeframes imposed on retailers and metering businesses to install a customer's meter:

- Minister Frydenberg proposed that a retailer should use its best endeavours to provide new and replacement metering installations on a date agreed with the customer, or otherwise within six business days of any preconditions being met. This obligation would apply to all situations in which a new or replacement meter is installed, except that we understand it is not intended to apply for malfunctioning meters where an existing obligation applies.
- The AEC proposed extending the timeframes in which malfunctioning meters must be repaired or replaced from ten business days to 20 business days.

In considering whether metering installation timeframes should be imposed in new and replacement situations, the Commission is interested to understand the benefits

38 Clause 7.8.10(a) of the NER.

and costs of doing so. In particular, the Commission will consider whether imposing a timeframe on the provision of metering services will lead to better outcomes for consumers.

Other than for malfunctioning meters, the NER have never imposed a timeframe on distributors or retailers for installation of meters or completion of connections. However, the connection requirements on distributors in some jurisdictions have imposed maximum timeframes for the connection process, which prior to the implementation of the metering competition rules in December 2017 included the installation of a meter. As discussed in section 2.2, the Commission is aware of connection timeframes in South Australia and Victoria. In the other jurisdictions, there are no such connection timeframes imposed on distributors.

These jurisdictional obligations only apply to new connections. The Commission understands that no jurisdictional instruments currently impose, or have previously imposed, installation timeframes for replacement meters, for example for malfunctioning meters or where a customer requests an upgraded meter due to the installation of solar.

The Minister's proposal also suggested that the timeframe for new and replacement scenarios would commence after a number of preconditions are met. For faults, the existing ten day timeframe in the NER starts when the metering coordinator is notified of the fault. The Commission is seeking feedback on the types of steps that would need to occur before the retailer and metering coordinator can commence the steps necessary to install the meter in other scenarios.

Question 1 Requirements for meter installation timeframes

1.1. What are the benefits to customers of imposing installation timeframes in new and replacement situations?

1.2. What are the expected costs of imposing installation timeframes?

1.3. Should there be different requirements for different types of installation scenarios and why?

1.4. Should the current timeframe in the NER for the replacement of malfunctioning meters be amended? If so, what is the appropriate timeframe?

1.5. If a timeframe was imposed for new and replacement situations, at what point should the 'clock' start? That is to say, what preconditions would need to be met before the relevant timeframe should commence for each of the different types of installation scenarios?

5.2 Potential measures to improve the meter installation process

Under the NER and NERR, a number of steps need to occur before a retailer and metering coordinator can complete the installation of a new or replacement meter.

Minister Frydenberg's rule change request notes that additional obligations also apply under jurisdictional instruments, such as jurisdictional safety requirements. If a maximum timeframe is imposed then, depending on when the clock starts for measuring that timeframe, it may not be possible for retailers and metering coordinators to comply with Minister Frydenberg's proposed six day timeframe (albeit proposed on a 'best endeavours' basis) while also complying with all other current obligations under the NER, NERR and jurisdictional instruments.

This challenge could be addressed through a combination of:

- the issues discussed above regarding the appropriate time period for any new obligation and the preconditions that must be met before the clock starts
- the issues discussed in this section regarding potential changes to help speed up the installation process.

The AEC has made several proposals that may help to minimise the timeframes to install meters. These include:

- allowing the customer and retailer to agree to a planned interruption notice period that is shorter than four days
- allowing a customer to agree to the installation of a new deployment meter and waive the notification process.

The existing process requirements were imposed on retailers through the competition in metering rule change. To aid stakeholder feedback, this section sets out the rationale provided in the final rule determination, and draws out how the proposals could potentially be implemented and the possible implications.

5.2.1 Shorter planned interruption notice

Under the NERR, retailers are able to arrange a retailer planned interruption to their customer's electricity supply provided that the interruption is for the purposes of installing, maintaining, repairing or replacing an electricity meter. Retailers are unable to carry out unplanned interruptions, which are carried out exclusively by the distributor. For both retailer planned interruptions and distributor planned interruptions, the customer must be notified at least four business days before the outage.[39]

The issue of whether a retailer should be able to arrange a planned interruption within a period of less than four business days with the customer's agreement was considered

39 Clauses 59C(2) (retailer) and 90(1) (distributor) of the NERR.

in the competition in metering final rule determination. In the final determination, the Commission decided it was appropriate that:[40]

> "the same obligation to notify the customer at least four business days before the date of the interruption apply to both retailer planned interruptions and distributor planned interruptions. These minimum requirements allow customers sufficient time to plan for the interruption. Consistent with the DNSP's existing obligations to notify customers of planned interruptions under rule 90(1) of the NERR, the final rule permits retailers to provide notification of a retailer planned interruption by any appropriate means. This rule provides retailers, who often have more customer information than the DNSP, flexibility in the means by which they notify their customers about interruptions, for example by email or text messaging."

In the final rule determination, the Commission stated that the intention was that the rules related to distributor planned interruptions were to be applied equally to retailer planned interruptions, given the impact on the customer is the same whether the distributor or retailer is carrying out the interruption.[41]

However, in its rule change request the AEC noted that the jurisdictional derogations in Queensland and New South Wales enabled the distributor and customer to agree a preferred date for a planned interruption for the purposes of meter replacement or repair. Jurisdictional governments have not made similar derogations in relation to retailers' new planned interruption obligations.[42]

The AEC has proposed that customers should be able to agree with the retailer an alternative date for a planned interruption, even if this falls within the minimum four day notification period. As noted in section 3.3, the AEC considered this would enable meters to be installed in a more timely and efficient manner, ultimately lowering costs for the industry and consumers.

However, the four day notification period provides a consumer protection as it provides opportunity for a customer to prepare for the planned interruption. While the AEC's proposal focuses on consumers being able to choose or agree to a date and time for the planned interruption, the Commission is interested in feedback on the implications of altering this consumer protection and how any risks could be managed, including:

- How would the customer's agreement to the shorter timeframe be secured and verified?
  - Could agreement occur over the phone or would it need to be in writing?
  - Could agreement occur with the metering provider or should it be agreed with the retailer?
- Whether the proposal should apply to life support customers?

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40 AEMC, Expanding competition in metering and related services, Final rule determination, 26 November 2015, p. 207.

41 ibid, p. 205.

5.2.2 Customer notification process for new meter deployments

Under the NERR, a retailer is able to deploy advanced metering to its customers where it sees a business case to do so, as a "new meter deployment". In these cases, the existing meter is still functional and would not otherwise need to be replaced. The NERR allows for customers to opt out of the deployment and retain their existing meter, and sets out a notification process for the retailer to provide customers the opportunity to opt out of the new meter deployment.

The retailer must provide two written prior notifications to the customer:[43]

- the first no earlier than 60 business days and no later than 25 business days before the proposed installation
- the second no earlier than ten business days after the first notice and no later than 15 business days before the proposed installation.

These notifications must include, among other things, that the customer may opt out of the proposed new meter deployment by informing the retailer.

The written notification process gives the customer sufficient information and time to make an informed decision about whether to opt out of the new meter deployment. A customer may opt out at any time after receiving the first notice, up until the date specified in the notification (the last opt out date), which must be no earlier than seven business days before the proposed installation date.[44]

The AEC has proposed that a customer should be able to authorise the retailer to undertake the meter deployment and waive their right to the opt-out notification process, so long as the consent is communicated in a manner that can be verified. This 'early consent' would be able to occur at any time, and as a result the retailer would not be required to comply with the notification requirements in rule 59A of the NERR.

Given the notification process for new meter deployments may take up to 60 business days, this proposal may enable retailers to deploy meters at a faster rate, where the customer has provided early consent. Both customers and retailer may benefit from being able to access the products and services available from the advanced meters sooner.

However, this proposal would remove the ability for customers to change their mind on consenting to a new meter deployment, as they would have waived their right to opt out of the deployment. In addition, rule 59A sets out content requirements for the notifications to customers. The AEC has not proposed any requirements to guide how early consent would be obtained by the retailers, except that it must be communicated in a manner that can be verified.

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42 AEC, rule change request, *metering installations - planned interruptions*, p. 1.

43 Clause 59A(2) of the NERR.

44 AEMC, Expanding competition in metering and related services, Final rule determination, 26 November 2015, section C2.5.2.

The Commission is seeking clarification on the issues caused by the current notification process and the implications of the proposal, including:

- What are the consumer benefits of this change? While the Commission is aware of numerous customer complaints regarding installation timeframes for new connections and customer requested meter upgrades, the Commission is not currently aware of customer concerns regarding installation delays for new meter deployments that are instigated by the retailer without any request from a customer for a new meter.

- Would retailers use such a rule to reduce installation timeframes in practice? For example, the planned new meter deployment would likely occur across an area of customers on the specified date, to maximise the efficiency of the metering provider. If some customers have provided early consent for the new meter deployment, it may not be efficient for the metering provider to install a new meter at those premises on an earlier date.

- The notification requirements and the customer's ability to opt out of the new meter deployment provide a consumer protection. The current opt-out notice provisions contain content requirements so that customers can make an informed decision about whether to accept the new meter deployment or opt-out, and also enable customers to change their mind up to the last opt-out date. The proposed changes do not contain similar protections. Is that appropriate? If there is evidence of customer confusion in some circumstances, is a more targeted change appropriate, for example allowing a customer to consent after receiving the first opt-out notice and waive the requirement for a second notice?

5.2.3 Other options to minimise installation timeframes

There may be other opportunities to minimise the timeframes needed to install a customer's meter.

For example, in the AEC's rule change request, it sets out that the process to nominate and appoint the metering coordinator and metering provider can take four business days. This is because under current AEMO procedures these roles are appointed sequentially and the MSATS Consumer Administration and Transfer Solution procedure contains mandatory objection periods whenever a change request is initiated.[45] The Commission is interested in whether there may be opportunities to reduce installation timeframes by streamlining these requirements and the implications of potential changes such as enabling roles to be appointed at the same time.

The Commission is also interested in whether there are any other options that would help to minimise the processes and timeframes involved in meter installation or replacement, without compromising safety or consumer protections.

45 AEC, Rule change request, *Meter installation - planned interruptions*, p. 6.

Question 2 Potential measures to improve the meter installation process

2.1. For each of the options to minimise process timeframes above (planned interruption notices and the customer notification process):

(a) What are the benefits of the proposal?

(b) What costs and risks for participants and consumers would be involved in implementing the proposal? How could these costs and risks be managed, for example through limitations in the NERR on the circumstances in which: planned interruption timeframes could be reduced; or new meter deployment notices could be waived?

(c) Is there any new information that is now available following implementation of the competition in metering rules that should change how the Commission considered these issues in the final rule determination?

2.2. Are there any other options that would help to minimise the processes and timeframes involved in meter replacement, without compromising safety or consumer protections?

5.3 Other issues related to planned interruption notices

The AEC has raised further specific issues related to planned interruption notices, including proposals that:

- the enquiry line for planned interruption notices should not be required to be a 24 hour phone line
- the requirement to provide planned interruption notices to large customers should be removed.

These requirements were imposed on retailers through the competition in metering rule change. This section sets out the rationale provided in the final rule determination and draws out some of the implications of the proposals to aid stakeholder feedback.

5.3.1 24 hour enquiry line

As discussed above, retailers must provide a planned interruption notice to customers at least four business days prior to an interruption for metering work. The NERR set out minimum content requirements for this notification, including the expected date, time and duration of the interruption, a 24 hour telephone number for enquiries, and a statement that any enquiries about the interruption be directed to the retailer.[46]

46 Clause 59C(4) of the NERR.

These minimum content requirements mirror the notification requirements on distributors in carrying out planned interruptions.

The AEC proposed that the requirement for retailers to provide a 24 hour enquiry line for planned interruption notices is unnecessary, and instead proposed that they provide an enquiry line during business hours. This would not affect the emergency phone line provided for life support customers.[47]

If this option were implemented, customers that receive a planned interruption notice would only be able to contact the retailer to ask questions or change the appointment time during business hours. The core business phone hours may depend on the retailer.

The Commission notes that the NERR do not require that planned interruptions only occur during business hours. As a result, if this change was made and a retailer planned interruption occurred outside of business hours, the customer would be unable to contact the retailer to enquire about the reasons for the interruption and its expected duration. This could cause significant confusion and inconvenience for customers. It could also potentially result in additional costs for distributors as customers instead contact the distributor to try to determine if the interruption was caused by a distributor planned or unplanned interruption.

The Commission also notes that retailers must, from 1 February 2019, also provide a 24 hour phone line for life support customers.[48] Given a 24 hour phone line would be provided for life support customers, the Commission is particularly interested in understanding the cost savings of not providing a 24 hour phone line for planned interruption notice enquiries, and whether this outweighs the benefits customers may receive from having access to a 24 hour enquiry phone line.

5.3.2 Planned interruption notices for large customers

The requirements discussed above to provide planned interruption notices apply to both small customers and large customers. They also apply to both retailer planned interruptions and distributor planned interruptions, and prior to the commencement of the competition in metering rule change applied to the planned interruptions of distributors.[49]

The requirement for a retailer to provide a planned interruption notification to large customers was considered in the competition in metering final rule. The Commission

47 Life support customers are currently provided with a 24 hour emergency phone line for the distributor. Clause 124(1)(e) of the NERR. From 1 February 2019 the retailer will also be required to provide a 24 hour phone line for life support customers.

48 National Energy Retail Amendment (Strengthening protections for customers requiring life support equipment) Rule 2017 No. 3, Sch 1 s. 2, substituted rule 124(1)(b)(vi).

49 Division 5 of Part 4 of the NERR (which contains the distributor planned/unplanned interruption obligations) is not expressed to apply only to small customers. Therefore the notification requirements for planned interruptions apply to both small customers and large customers.

decided that the requirement on retailers should mirror the requirement on distributors to provide such notifications.[50]

The AEC raised the issue that many large customers that have CT connections are not affected by outages when their meter is being replaced. Such customers do not need to receive a planned interruption notice when metering work is being carried out, as there is no interruption of supply.[51]

The AEC noted that the retailer does not have access to information about which customers have CT connections and therefore must send a planned interruption notice to any of its large customers for which metering work is being carried out.

To address this issue, the AEC proposed that retailers should not be required to provide planned interruption notices to large customers.

The Commission is seeking further feedback on the costs and benefits of providing planned interruption notices for large customers.

If this change was made, large customers without CT meters will experience a supply interruption when metering work is carried out but will receive no notification of that outage. Such an outage could have very significant impacts for these customers.

Combined with the proposed change to the 24 hour enquiry line, these changes could mean that large customers experience an interruption with no notice outside of business hours but are unable to contact their retailer to enquire about the reasons for the outage or its expected duration.

In addition, even if a large customer with a CT meter will not be affected by an outage, there may still be value for the large customer to know when its meter will be replaced.

Question 3 Other issues related to planned interruption notices

3.1. For each of the proposals related to planned interruption notices (the 24 hour enquiry line and notices to large customers):

(a) What are the benefits of the proposal?

(b) What costs and risks for participants and consumers would be involved in implementing the proposal? How could these costs and risks be managed?

(c) Is there any new information that is now available following implementation of the metering competition rules that should change how the Commission considered these issues in the final rule determination?

50 AEMC, Expanding competition in metering and related services, Final rule determination, 26 November 2015, p. 216.

51 The definition of retailer planned interruption in rule 59B of the NERR is "an interruption to the supply of electricity to a customer that: is for the purposes of installing, maintaining, repairing or replacing an electricity meter."

6 Lodging a submission

The Commission has published a notice under s. 95 of the NEL and s. 251 of the NERL for this rule change proposal inviting written submissions. Submissions are to be lodged online or by mail by **Thursday, 12 July 2018** in accordance with the following requirements.

Where practicable, submissions should be prepared in accordance with the Commission's Guidelines for making written submissions on rule change requests[52] The Commission publishes all submissions on its website subject to a claim of confidentiality.

All enquiries on this project should be addressed to Ed Chan on (02) 8296 7800.

6.1 Lodging a submission electronically

Electronic submissions must be lodged online via the Commission's website, www.aemc.gov.au, using the "lodge a submission" function and selecting the project reference code ERC0236. The submission must be on letterhead (if submitted on behalf of an organisation), signed and dated.

6.2 Lodging a submission by mail

The submission must be on letterhead (if submitted on behalf of an organisation), signed and dated. The submission should be sent by mail to:

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

The envelope must be clearly marked with the project reference code ERC0236.

52 This guideline is available on the Commission's website: www.aemc.gov.au.

Abbreviations

AEC	Australian Energy Council
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
Commission	See AEMC
FRMP	financially responsible market participant
MSATS	market settlements and transfer solution
NEL	National Electricity Law
NEM	National Electricity Market
NEO	National Electricity Objective
NER	National Electricity Rules
NERL	National Energy Retail Law
NERO	National Energy Retail Objective
NERR	National Energy Retail Rules
NGL	National Gas Law
NGO	National Gas Objective
NGR	National Gas Rules
NMI	national metering identifier