12 July 2018

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Sir/Madam,

National Electricity Amendment (Metering Installation Timeframes) Rule 2018 (ERC0236)

PLUS ES welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) consultation paper on the National Electricity Amendment (Metering Installation Timeframes Rule 2018 (ERC0236).

The rule change proposal indicates a change in the connection timeframe obligations placed on Retailers, Metering Coordinators (MC) and Networks for New Connections, Adds & Alts, Asset Replacements and Faults.

Proposed Timeframe

PLUS ES understands that the best endeavours timeframe proposed for new and upgrade connections will be 10 business days. There is some contention around the trigger for when the 'clock' starts and this would need to be clarified in the rule proposal. PLUS ES as a Metering Provider would expect that the trigger would be the later of the Retailer Service Order receipt date and time and the time the DNSP supply is expected to be connected.

We expect that there will be a number of exceptions to the above timeline such as delays occurring due to scenarios such as:

- No Access to metering installation
- Supply not connected on expected date
- Electrical & other safety constraints, including asbestos, requiring additional works, not able to be completed at appointment time
- Jurisdictional Service Rules obligations requiring additional work, not able to be completed at appointment time
- Customer refusal at time of metering installation
- Shared Fuse Isolation affecting third party customers.
- Customer requesting alternative date for metering installation.

PLUS ES would also like to explore the relaxing of the notification period when a customer

elects a date that would fall within the strict notification period (4 business days) to allow the installation of metering at a time that the two parties have agreed is suitable. Similarly, where the customer negotiates a date in advance with a Retailer that suits their circumstances, the elapsed time should not be taken as a breach of the timeframes.

PLUS ES would also like to explore the concept of an "MC Planned Interruption" where, for the purpose of installing metering equipment, the MC would be allowed NMI discovery rights to identify third party customers that would be affected by the operation of a shared fuse and be allowed to negotiate temporary supply interruptions with the third party customers. The aim of this change would be to facilitate more efficient and timely installation of metering equipment, predominantly in multi-occupancy circumstances, by avoiding the extra step of employing a "Network Planned Interruption".

Planned Interruption Notification to Customer (PIC)

The PIC process must be considered in this rule change in line with any enforced connection timeframes. PLUS ES would encourage all Retailers to either utilize electronic media to deliver a PIC or use customer recording in the event that a customer has initiated the meter exchange to reduce to time to serve.

Meter Malfunctions

A longer timeframe appears more suitable to respond to Meter Malfunctions given the nature of the situation. An extension from 10 days to 20 days appears reasonable although, again, the 'clock' start trigger must be clearly defined. PLUS ES would encourage this extension, most advantageous in circumstances where market parties are changing. This occurs predominantly in response to the failure of a Type 5 or 6 metering installation where the DNSP raises an Meter Fault Notification (MFN) and the time taken for market transactions to complete preclude the possibility of completing the work within a 10-day window.

Notification of Supply Service Works

It appears that a large number of complaints have stemmed from customers being left without supply in some networks although this situation may have eased recently. A rule change to require Networks to notify MPs of Supply Service Works via a defined mechanism would greatly assist in this area and set customer expectations. PLUS ES would support the provision of this notification.

Removal of Planned Interruption Notices for Large Customers

As PLUS ES has been servicing the large customer market for many years, we would support

the rule change to rule 59C of the NERR to relax the requirement for a large customer site to be notified of planned interruptions for circumstances where electricity supply does not need to be isolated. As noted, many of our large customers are CT connected which allows the majority of metering work to be completed without resulting in a supply interruption to the customer.

The paper posed a number of questions. Please see the more specific feedback from PLUS ES in Attachment 1 to this letter.

PLUS ES would welcome any further discussion in relation to this submission. If you have any questions or wish for further discussion, please contact Linda Brackenbury on 02 4035 6933 or at Linda.Brackenbury@pluses.com.au.

Sincerely,

Jason Clark
EGM - PLUS ES

Attachment 1: Stakeholder feedback

Questions		Feedback
Question 1 – Requirements for meter installation timeframes		
1.	What are the benefits to customers of imposing installation timeframes in new and replacement situations?	Introducing a best endeavours installation timeframe into the Rules will provide customers with greater certainty as to when they can reasonably expect a meter to be installed.
2.	What are the expected costs of imposing installation timeframes?	A 10 business day timeframe, coupled with exclusions associated with delays outside the control of the installer, is typical of existing Retailer KPIs. In this case, PLUS ES expect cost impacts to be minimal contingent on these reasonable exclusions being included in the ruling. Examples of the typical exclusions are detailed in the accompanying letter. Where the exclusions apply, the associated service order should be removed from timeframe obligation or at least allow the suspension of the clock, only to restart where the conditions that led to the original suspension have been resolved.
3.	Should there be different requirements for different types of installations and why?	PLUS ES recommend that this Rule change is specifically applied to customer initiated metering service works. Services that related to malfunctioning meters (see below), Retailer Led Deployments and Mass Asset Replacements initiated by meter family failures, should be excluded or considered separately. Special consideration should be given in the Rules to sites in rural/regional areas where the timeframes may need extension.
4.	Should the current timeframes in the NER for the replacements of malfunctioning meters be amended? If so, what is the appropriate timeframe?	PLUS ES agree with the 20 business day timeframe from MC nomination proposed by the AEC i.e. an increase from 10 business days to 20 business days. A 20 business day timeframe is reasonable as it allows time for the additional processes introduced by PoC e.g. the new MC/MP role nomination requirements not present when the LNSP managed the process end to end.

Questions		Feedback
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?	Preconditions should include: Customer has provided consent to meter the site in the 10 business day timeframe i.e. the meter service works is customer initiated. Customer has arranged an appointment where the customer requires the job to be completed on a specific date/time The MC/MP has received notification of the completion of Supply Service Works where applicable.
Question 2 – Potential measures to improve the meter installation process		
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?	As per Q1, point 1
(b)	What costs and risks for participants and consumers would be involved in implementing the proposal? How these costs and risks could be managed, for example through limitations in the NER on the circumstances in which: planned interruption timeframes could be reduced; or new meter deployment notices could be waived?	PLUS ES supports the AEC's proposed amendments to the existing the Planned Interruption Notifications to the Customer (Rule 59C). In the case where the customer has initiated the metering service works or has requested a new time directly with the MP (ie rescheduled), then the 4 business days notification period should not apply. The original customer notification of at least 4 business days should still apply. PLUS ES suggest that the Planned Interruption Notification to the Network (Rule 99A) must also be considered. For example, in order that the Network can account for outages, is same day notification to the Network acceptable.
(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	PLUS ES suggest that the MC be allowed NMI discovery rights to identify third party customers that would be affected by the operation of a shared fuse and be allowed to negotiate temporary supply interruptions with the third party customers. The aim of this change would be to facilitate more

Questions		Feedback
	determination?	efficient and timely installation of metering equipment, predominantly in multi-occupancy circumstances, by avoiding the extra step of employing a “Network Planned Interruption”
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?	Nothing additional to the points already covered above.
Question 3 – Other issues related to planned interruption notices		
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?	For large customers where metering work can be completed without supply interruption (such as the replacement of a meter at a CT connected installation) then the relaxation of the requirement to send planned interruption notices will increase efficiencies.
(b)	What costs and risks for participants and consumers would be involved in implementing the proposal? How could these costs and risks be managed?	No comment
(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?	No Comment