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24th October 2018

Our Ref: HW2009-1196/43/66

Jess Boddington Advisor Australian Energy Market Commission

RE: Metering installation timeframes

Dear Jess,

I represent a state owned corporation with in excess of 700 metered sites. Of these there are approximately 550 small sites. The majority of these sites are outdoor switchboards with locked cubicles. We typically add or replace 20 switchboards per annum. We welcome the changes and believe they should make a significant improvement to the issues currently faced by customers in relation to having known timeframes and a clear process. While we and other customers like ourselves represent a small portion of the meter installations we potentially face a disproportionate burden if our situation is not considered under the rule change.

We have two submissions for consideration:

- The process for meter upgrade and / or replacement whereby a retailer, in conjunction with the metering coordinator, advises the customer via a planned interruption notice. Our polices are such that in order for electrical work to be conducted on our sites the worker must have successfully completed our inductions. The process proposed does not appear to tackle such situations.
- 2. It would be extremely advantageous for us to be able to arrange for the meter to be installed while the switchboard is still at the manufacturer's workshop. This makes a significant impact to the task loading on the day of initial energisation at site as well as tackling the WHS implications associated with meter installers entering and conducting electrical work within the confines of a construction site controlled by a third party.

We would like to see this rule take these points into consideration.

Kind regards

Cyril Murtagh

Manager Energy & SCADA, Service Delivery for Customers

Hunter Water Corporation