

INTRODUCTION OF MC PLANNED INTERRUPTIONS

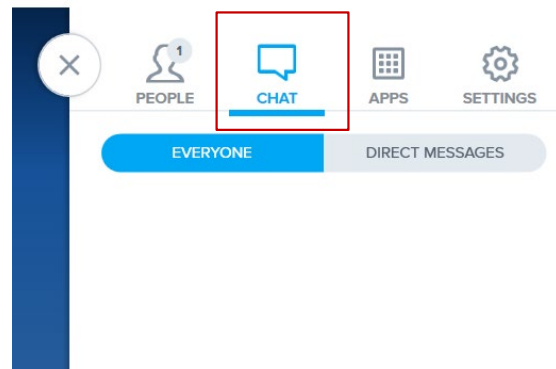
STAKEHOLDER WORKSHOP

AUSTRALIAN ENERGY MARKET COMMISSION
20 APRIL 2020

AEMC

Online workshop house keeping

- As you enter the Blue Jeans call, your microphone will be muted. We ask that it remains muted for the majority of the call, except when you're called upon.
- Video is optional, but having it turned off helps with performance and minimises distractions.
- We also ask that you utilise the Chat function on the side for any questions or comments you may have. There is time allocated for facilitated discussion.
- If you have dialled in via phone, could you please direct message Alisa Toomey your name for our records.
- Be respectful of all participants and the process.



If you would like to ask a question, or make a comment, please use the chat function.

Before we start, an important notice: Compliance with Competition Law

- We must not discuss, or reach or give effect to any agreement or understanding which relates to:
 - Pricing
 - Targeting (or not targeting) customers
 - Tendering processes
 - Sharing competitively sensitive information
 - Breaching confidentiality obligations

Each entity must make an independent and unilateral decision about its commercial positions.

Agenda

Time	Agenda item	Presenter
1:00pm	Welcome and workshop overview	Ed Chan (AEMC)
	Introduction and background	Ed Chan (AEMC)
	AEMC Draft Rule overview	Alisa Toomey (AEMC)
	Policy Options	Alisa Toomey (AEMC)
	Facilitated discussion – amendments to the draft rule	Ed Chan & Alisa Toomey (AEMC)
2:10pm	BREAK	
	Overview of alternative solution	Doug Ross (CMIG) & Travis Worsteling (EA)
	DNSP viewpoint	Dor Son Tan (ENA)
	Consumer group viewpoint	TBC
	Independent consultant - ARUP	Chris Amos (ARUP)
	Market bodies viewpoints	Lee Brown (AEMO)
	Key discussion – alternative solution	Ed Chan & Alisa Toomey (AEMC)
4:00pm	Close	Ed Chan (AEMC)

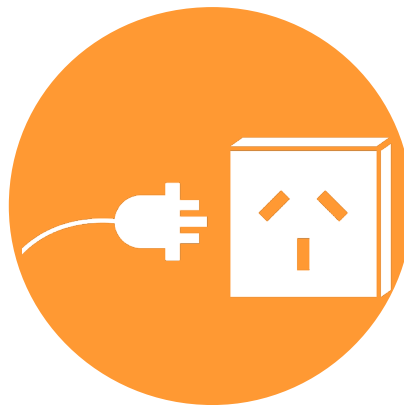
BACKGROUND

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Why are we here?

- Metering installation delays can have a severe impact on customers.
- CMIG submitted a rule change request on 20 May 2019 seeking for MCs to be able to interrupt supply to all customers at a site for metering purposes.
- The AEMC published a more preferable draft rule on 19 December 2019.
- Submissions to the draft rule proposed some amendments to the draft rule, and a cohort of stakeholders also proposed an alternative solution to the draft rule.



Stakeholder feedback on amendments to the draft rule and a possible alternative solution.

What do we want to achieve today?

We are here to discuss:

- the draft rule
- potential amendments to the draft rule
- an alternative rule proposed by a cohort of stakeholders



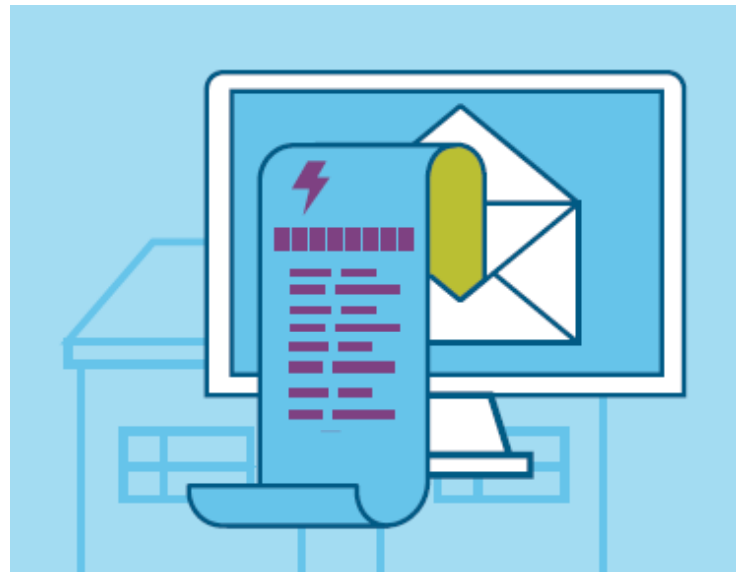
Identifying the most appropriate solution for isolation issues in the context of multi-occupancy dwellings

Recap – Metering installation timeframes

- **Retailers** are currently responsible for arranging **metering services** for their customers, by engaging the **Metering Coordinator (MC)**.
- Retailers are required to **install a meter** for a new connection or a simple meter exchange either **by a date agreed** with the customer, or within 6 business days for a new connection or 15 business days for a simple meter exchange.
- There are **limited exceptions** to these timeframes, including where installing the meter requires **interrupting supply to other retailers' customers** i.e. there is **shared fusing**.
- DNSPs are required to coordinate with the retailer in order to allow the retailer to meet its timeframe obligations.
- Planned interruptions are required to allow for meter installation.

Recap – Planned interruption notification

- **Retailers** and **DNSPs** may either engage with the customer to **agree** a suitable date or date range for their supply to be interrupted, or provide the customer with a minimum **4 Business Days** notice.
- Where a person residing at the premises requires *life support equipment*, customer's consent cannot be given for a date range.
- **Retailer planned interruptions** are for **metering works**, but must not interrupt the supply of other retailers' customers
- **Distributor planned interruptions** are for maintenance, repair or augmentation of the network (including metering equipment), or for connection services



CMIG proposed rule recap – Introduction of MC planned interruptions

- **Metering Coordinators to be allowed to arrange for planned interruptions** for multiple customers at a site for the purpose of **installing metering equipment**.
- Giving MCs the **same rights and obligations** around planned outages **as distributors** under the NER and NERR including the same obligations to notify customers, and the same penalties.
- Notification of distributors and retailers would be via the B2B eHub unless an alternative method of notification is agreed.
- The rule change request proposed that MCs be allowed to arrange for planned interruptions of an unlimited number of customers.
- The rule proponent proposed removing the current exception from the metering installation timeframes.

Key issues – underlying issue of supply interruption for multiple customers



Often it is not known that there are shared fusing or other issues until the metering provider attends the premises to install the meter



What is the best way to reduce delays for customers with shared fuses, and allow more timely and efficient meter installation?

SESSION 1

SUGGESTED AMENDMENTS TO THE DRAFT RULE



AEMC DRAFT RULE

OVERVIEW



Introduction of timeframes where there is shared fusing

Where the installation of an electricity meter, or the rectification of a malfunctioning meter, will require interrupting the supply to other customers:

- **retailers** need to complete the meter installation within 30 BD of discovering the shared fusing
- **MCs** need to rectify meter malfunctions within 30 BD of discovering the shared fusing
- if requested by a retailer or MC, **DNSPs** would be required to carry out a distributor planned interruption within 25 BD to allow for the retailer or MC to meet their timeframes.

Clarification and recording of shared fusing information

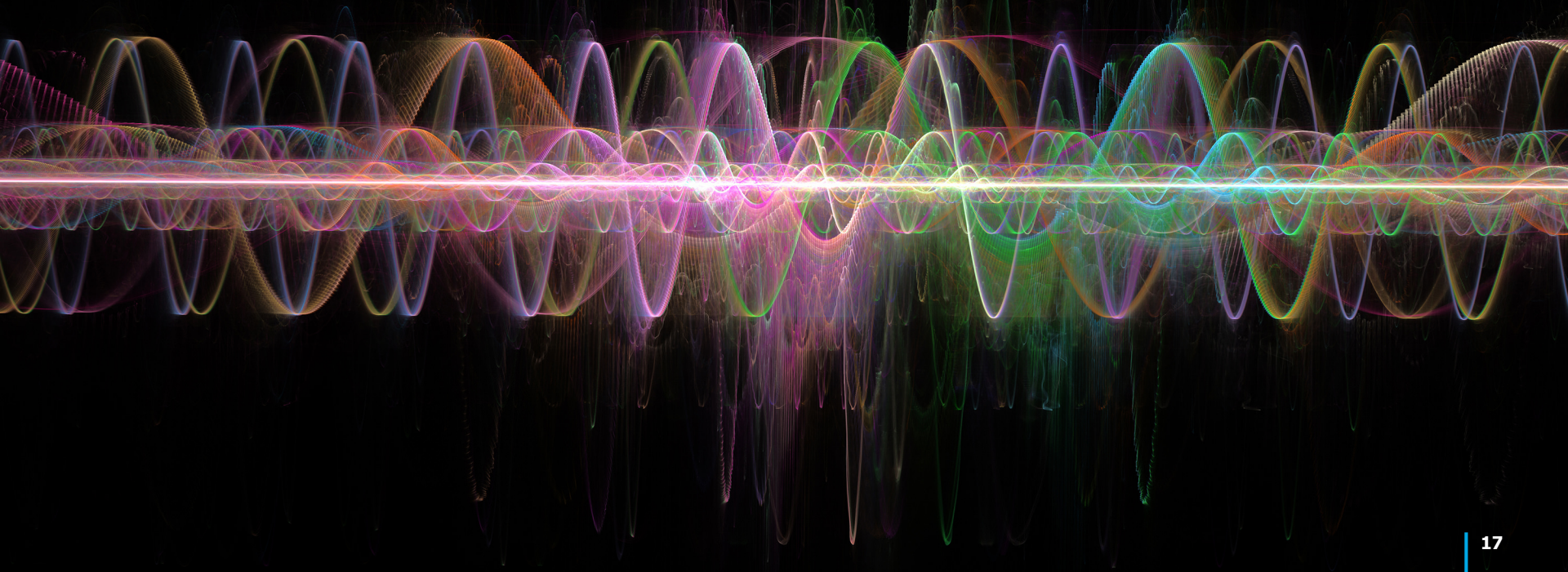
- Clarifies that **retailers** are able to interrupt supply to **ANY** of their **own customers** for **metering** purposes (not just the customer receiving the new meter). Retailers could also choose to coordinate retailer planned interruptions.
- If a retailer planned interruption cannot be carried out, the retailer can organise for a DNSP planned interruption (e.g. where there are multiple retailers, and they do not want to coordinate)
- Retailers and MCs are required to inform DNSPs when shared fusing is discovered, with DNSPs to then **record the shared fusing information** as soon as practicable

What did the draft rule seek to do?

- **Reduce timeframes** for meter installation where there is shared fusing, **without** introducing risks to **consumer protections**.
- Provide certainty where there is **shared fusing** by **introducing further timeframes**:
 - 30 BD timeframe was proposed after bilateral discussions with stakeholders
 - The 25 BD obligation on DNSPs to carry out a planned interruption where requested provided a retailer 5 BD to determine if it is the retailer of ALL customers with the shared fuse, or to coordinate a retailer planned interruption, if possible.
- **Reduce** the number of **site visits** (and costs) in the long term by proposing the introduction of a mechanism to record and share information on existing shared fuses (where discovered).
- **Maintain** clear lines of **accountability** and **responsibility**, and consumers have access to **recourse via existing mechanisms**.

POLICY OPTIONS

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Policy decision considerations

Stakeholders provided a number of suggestions which could improve the operation of the draft rule. An alternative solution was also suggested which requires further investigation.

There are **two possible scenarios** that we are discussing today:

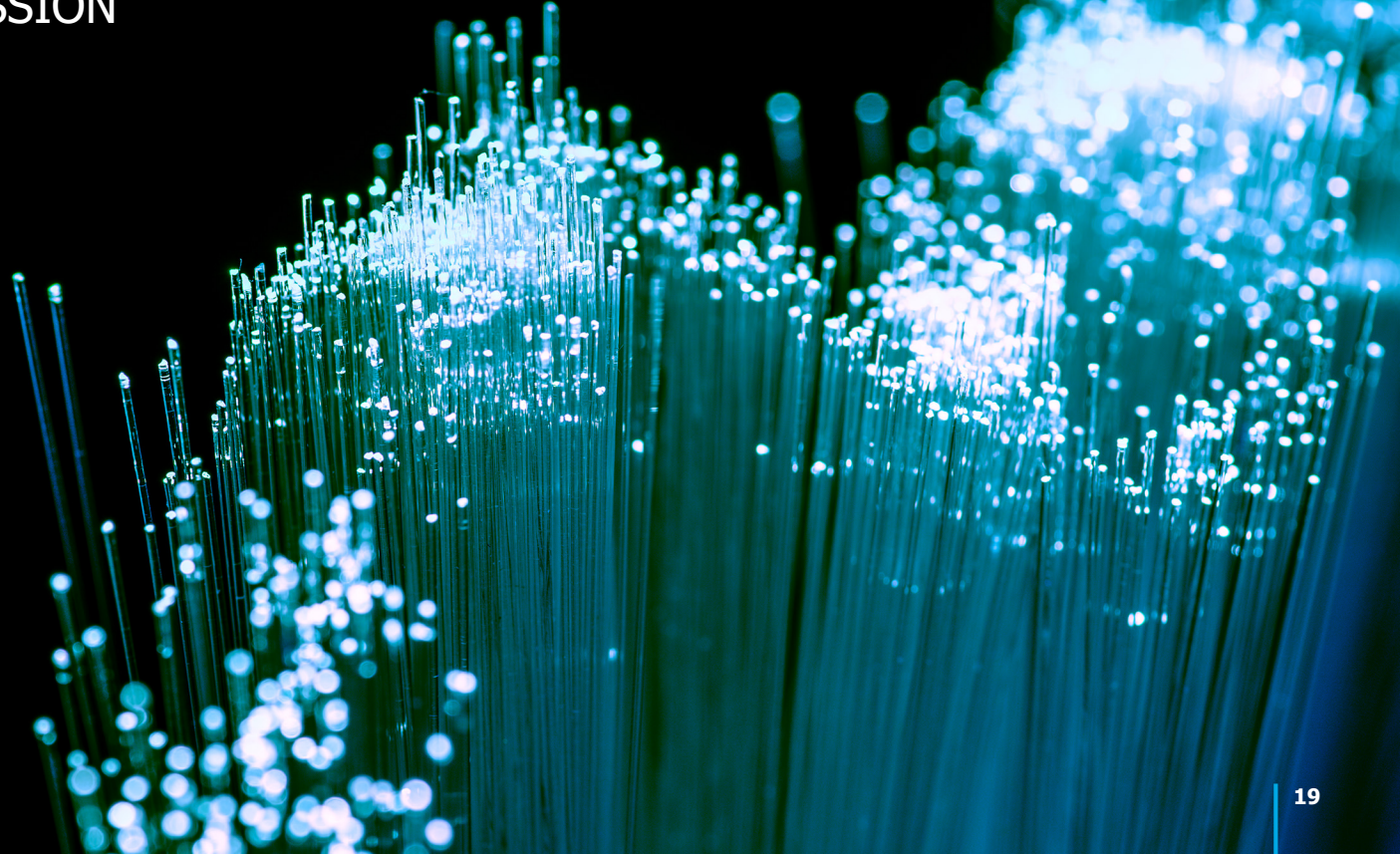
1. Suggested minor amendments to improve the operation of the draft rule by:

- Providing for customer choice of meter installation date
- Allowing for prioritisation of critical DNSP work and allowing other retailers to coordinate installation of other meters in the same supply interruption to reduce the number of interruptions to impacted customers
- Improving notification of planned interruptions to other market participants
- Providing greater time for consultation and system changes to implement the changes required under the rule.

2. An **alternative rule** requiring DNSPs to install separate isolation devices to each premises affected by shared fusing, at the first supply interruption to facilitate the installation of a new meter.

OPTION 1- AMENDMENTS TO DRAFT

FACILITATED DISCUSSION



Proposed amendments to the more preferable draft rule

Stakeholders provided a number of suggestions for amendments to the draft rule which are being considered.

Potential changes from the draft rule include:

- **Extend the timeframe** for **installation** of meters where there is shared fusing and/or allow for exceptions with complying where there have been severe weather events (for example)
- Allow customers to **agree** to an alternative meter **installation date**
- Require DNSPs to **notify all affected retailers** of the planned supply interruption via B2B procedures
- **Extend the timeframes for implementing the rule** to allow for system changes

Timeframe for installation of meters

ALTERNATIVE INSTALLATION TIMEFRAMES PROPOSED

- Extend timeframes to allow for severe storms, better scheduling of key work such as new connections, etc. For example, 40 BD
- Provide exceptions for severe storms, extreme temperatures or large numbers of family failure replacement
- Allow customers to agree to an alternate timeframe
- Extend timeframes to allow retailers to carry out retailer-led meter installations and/or reduce notification requirements around retailer-initiated meter replacements to allow for retailers to utilise the interruption and reduce the total number of interruptions

QUESTIONS FOR STAKEHOLDERS

1. 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?
2. 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?
3. 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?

Additional notification to market participants for planned interruptions

REQUIRING DNSPS TO TO NOTIFY ALL AFFECTED RETAILERS OF THE PLANNED SUPPLY INTERRUPTION VIA B2B PROCEDURES

This would allow retailers to proactively replace meters with a family failure, if required, at the same interruption, reducing the number of outages experienced by the customers.

QUESTIONS FOR STAKEHOLDERS

1. Should an additional requirement be placed on DNSPs to inform all affected retailers of the planned supply interruption via B2B procedures?
 - a. What are the benefits that can be gained from providing this information? Are there any impediments to being able to utilise this additional information effectively?
 - b. What are costs to provide this functionality? Are system updates required? What implementation timeframe would be needed if this obligation is imposed on DNSPs?
2. How does a retailer currently receive information on planned interruptions of its customers?

Timeframes for implementing the rule

EXTENDING IMPLEMENTATION TIMEFRAMES TO ALLOW FOR SYSTEM CHANGES

A number of different implementation timeframes were suggested by stakeholders. Some focused on the implementation of all changes under the draft rule, others focused on specific requirements such as the recording of shared fusing information.

QUESTIONS FOR STAKEHOLDERS

1. What system changes or process changes are required to meet the additional meter installation timeframes where shared fusing is discovered?
2. 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)?
3. Are there certain requirements under the draft rule where more time is needed?
4. What other system changes and / or other situations (for example Covid-19) may impact implementation timeframes?
5. What implementation timeframes would be realistic, if the draft rule (incorporating the suggested amendments) was made?

Recording shared fusing site information

Stakeholders had mixed views on the draft rule requiring shared fusing information to be recorded.

CHANGE PROPOSED	STAKEHOLDERS
Shared fusing information should be more detailed and specify other sites that share the same fusing.	Origin
Shared fusing information may not be of great value if not verified.	Energy Queensland, Vector
DNSPs should not be required to provide details of shared fusing on family failure notifications as this would be available in MSATS.	Vector, Ausgrid

QUESTIONS FOR STAKEHOLDERS

1. 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?
2. 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?

Break

The workshop will now break for 10 minutes.

Please enjoy a short break and return for the remainder of the workshop in 10 minutes.

SESSION 2

POSSIBLE ALTERNATIVE SOLUTION



Alternative solution to the draft rule proposed by some stakeholders

A cohort* of MCs and retailers proposed an alternative solution to the draft rule:

That DNSPs be required to install separate isolation devices for each of the premises with shared fusing at the first supply interruption to install a new meter.

The cohort views this as an a preferable solution as it would:

- **Resolve shared fusing** issues when discovered
 - **Reduce** the number of **supply interruptions** for meter installation for customers with shared fusing
 - **Reduce** the number of **site visits** required
 - **Remove** the need for **separate timeframes** for meter installation where there is shared fusing
 - **Remove** the need for **recording of shared fusing** in AEMO systems by DNSPs
- Some stakeholders were of the view that DNSPs should be able to recover the cost of installing separate isolation devices as regulated revenue.

*Cohort includes: CMIG, Vector, PlusES, Powermetric, MEA, EnergyAustralia, Simply Energy, AGL, Red/Lumo, AEC.

Potential alternative solution - issues requiring analysis

Issues for consideration include:

- **Costs** of **installing single isolation fuses** compared to costs of supply interruptions
- How to address **complex scenarios** such as where meter panels require replacement or location of fusing is problematic
- How the **AER would classify the costs** incurred by DNSPs, and any flow on impacts for customers
- If the proposed solution crosses partially into **jurisdictional** functions
- Whether the Commission should **prescribe** how DNSPs **operate their networks**

ALTERNATIVE SOLUTION

CMIG AND ENERGY AUSTRALIA





COMPETITIVE METERING
INDUSTRY GROUP



EnergyAustralia
LIGHT THE WAY

Proposed alternative rule
requiring DNSPs to install
separate isolation
devices during initial
interruption

Video Conference – 20th April 2020

Issue

Since the Power of Choice reform has gone-live, there have been issues impacting the installation of metering caused by shared isolation locations (shared fusing); one connection and no capacity to isolate the multiple customers connected.

Currently 3-5% of all meter installation attempts are delayed due to shared fusing, 10,000 per annum. The majority of these sites are not complex sites (less than 9 customers).

There are three variables to consider in this issue:

Timeliness

How long will a customer be delayed when they have requested a meter installation at a shared isolation point location.

Customer Costs

How much and who pays for the installation of a meter at a shared isolation point location; Metering Coordinator, Retailer, and Distributor fees.

Customer Impact

How many outages will a customer experience due to meter exchanges at a shared isolation point location.

The AEMC Draft Determination is designed to address the timeliness issue, it does not provide customer protections for cost (pass through charges) or negative customer experience (multiple outages and expensive fees).

Inefficiencies with draft rule

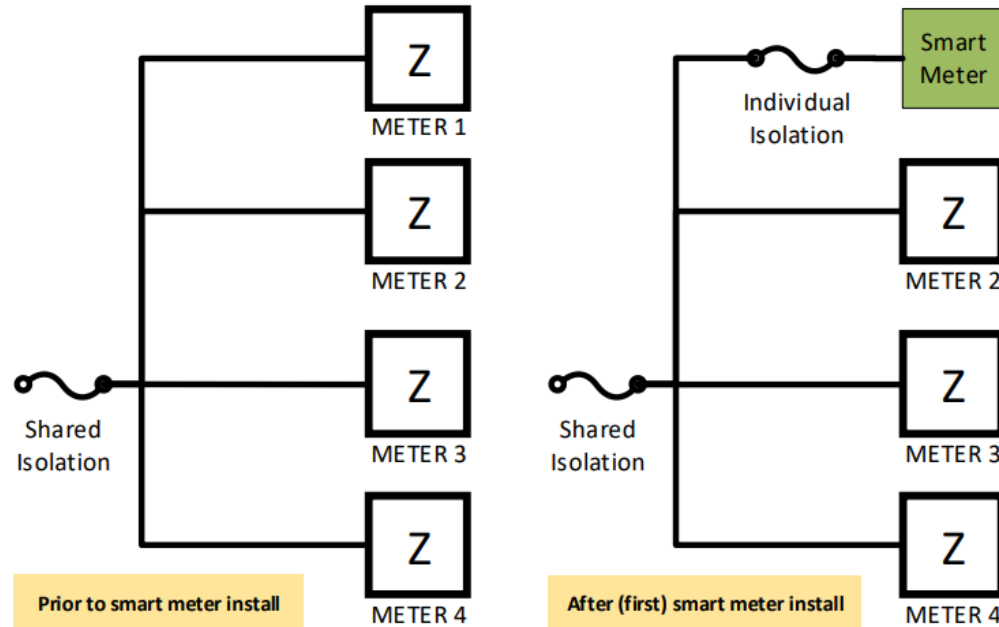
1. Draft rule will result in multiple truck roles to resolve the shared isolation at a site:

- 1st truck roll is MP visit to exchange meter, which identifies the presence of shared isolation;
- 2nd truck roll from DNSP to identify effected consumers (may be avoided at simple sites);
- 3rd (concurrent) truck roll from DNSP to carry out interruption coordinated with MP;
- 4th (concurrent) truck roll from MP to install isolation and meter on customer requesting meter coordinated with DNSP.

Note that the 3rd and 4th coordinated concurrent truck rolls are challenging for both the DNSP and MP and may result in missed interruptions if either truck is delayed.

2. The costs of the multiple truck roles may be recovered from the customer who needs their meter changed, dependent on the Retailer.
3. All customers will continue to be interrupted when meters are to be installed for other customers at the site, regardless if they have had their meter exchanged.
4. The multiple truck roll process repeats each time isolation is to be installed at a site, making the correction of isolation at the site very expensive and drawn out.
5. Current DNSP notification methods mean Retailers of other affected consumers at the site are unaware the site interruption is happening and therefore cannot respond to enquiries from customers or schedule metering works while the interruption is happening.

Why do multiple interruptions occur



This customer's supply will be interrupted four times, as each meter is installed.

They will likely be unhappy when they may have paid hundreds of dollars to have their own isolation installed on their meter.

Figure 1: Shared Isolation Scenarios

The Scale of the Issue

- A sample of just under 200,000 meter installations completed across the NEM (excl Vic) confirmed the rate of share fused sites is 3 to 5% of all attempted installs.
- Of these shared fuse sites, the majority seem to be simple sites with only a small number of customers affected by the shared fuse.
- If 250,000 meters are installed p.a., about 10,000 (~50 per day) are delayed due to shared isolation.
- If each shared isolation requires 4 truck rolls to resolve the costs would be \$10-20 million p.a.:
 - The average NSW DNSP's Supply Service Works (SSW) – Temporary Isolation Group Supply is \$596;
 - Endeavour Energy ~ \$650
 - Essential Energy ~ \$440
 - Ausgrid ~ \$700
 - (Avg. SSW) \$596 * 10,000 (delayed due to shared isolation) = \$5.96 million
 - \$5.96 million * 2 (the minimum truck rolls the DNSP require) = \$11.92 million p.a.

Note this only includes the DNSP's costs for truck rolls.
- If 5% of the approximately 7.5 million meters still to be replaced in the NEM require the proposed process to correct their isolation, the total cost to correct the shared isolation issue could be 224 million over many years.
- Amending the rule to reduce the number of truck rolls and level of coordination required between DNSP's and MP will produce a better customer experience and reduce these costs significantly (by 50% to 75%)

Proposed Alternative Solution

DNSP's be responsible for rectification by installing isolation devices (Meter Protection Device) during the initial interruption:

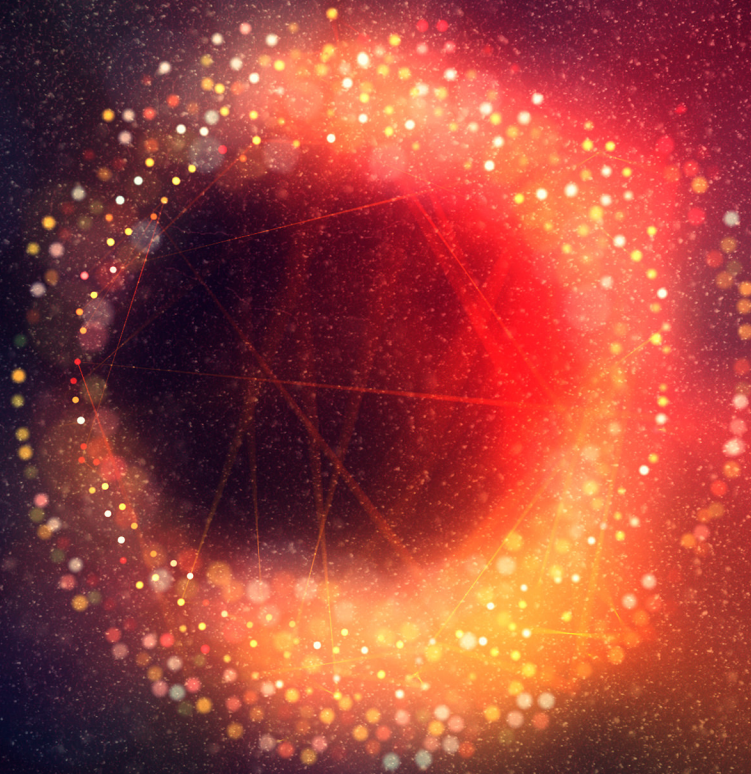
1. Shared isolation point is identified, either by Distributor or Metering Coordinator attending site, or customer informing the retailer.
2. After identification of the shared isolation point the Distributor is responsible for installing an isolation device for each meter at the location.
3. A timeframe can be included for the Distributor work, and any corresponding meter installation/s that are required.
4. All affected Retailers notified via B2B of the interruption

Pros

- **Timeliness:** Distributors can conduct the outage in the same or a shorter timeframe than the draft determination proposal. Future meter installations are not delayed at all. Mostly, no coordination is required with the MP.
- **Customer Impact:** After isolation devices are installed, future meter exchanges will not result in additional outages for other customers.
- **Customer Costs:** Significant reduction in comparison; with only one set of fees either applied to the initiating retailer, or preferably shared across a distributor's customer base as part of their determination.
- **Increased Efficiency:** Meters can be installed after the isolation devices are installed removing the need to coordinate truck rolls
- **Opportunity to increase deployment rates:** Retailers have the opportunity to initiate meter replacements for other customers at the site as they are made aware the isolation has been corrected.

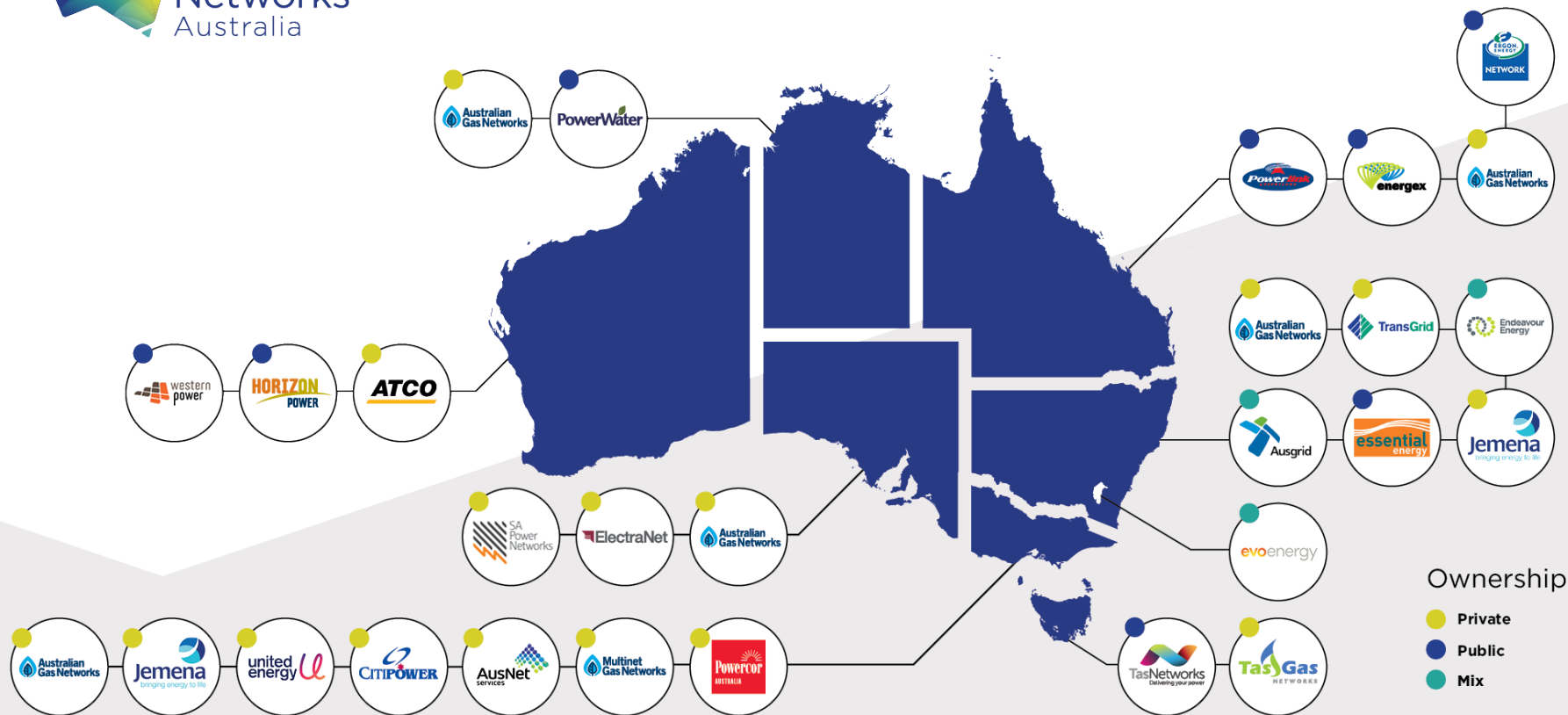
DNSP VIEWPOINT

ENA



Metering Coordinator Planned Interruption

Draft determination workshop 20/04/2020



A new rule change should be proposed

- » The discussion has slowly drifted from the original intent of the Metering Coordinator Planned Outage rule change to one regarding who should be responsible for shared fuse rectification and installation
- » This separate issue of shared fusing has wider implications and complexities that deserve more thorough consideration
- » A separate rule change should be proposed to provide more information and clearly define the issues to all participants
- » Only then should this separate rule change be considered to give all participants adequate notice and provide a response via established AEMC processes

Current Arrangements

- » Isolation is achieved by fusing or circuit breaker deep within customer's electrical installation and **well beyond the DNSPs "Point of Supply"**
- » Distributors are ringfenced and precluded from performing work on a customers electrical installation, which includes the meter isolation device, in accordance with the intent of metering competition
- » For new metering installations, the customer (via their REC) is responsible for providing the meter isolation device and wired in a manner to only isolate supply to a single installation
- » For existing metering installations with a shared fuse, the Metering Provider is responsible for providing the meter isolation device and wired in a manner to only isolate supply to a single installation
- » DNSPs do not typically have visibility or records of the volumes, locations and configurations of shared fuse arrangements as they are not DNSP assets. For example, In NSW shared fuse arrangements were allowable in the SIRs until late 2016.

¹ Some of the examples highlighted in this presentation are jurisdiction specific and don't necessarily accurately representative of all jurisdictions but provide an indication of the types of issues and complexity that would be associated with DNSPs installing meter isolators for shared fuse sites

Issues to consider

- » **The current Rules and frameworks** (noting slight differences between jurisdictions) **tightly define DNSPs responsibilities up to the Point of Supply**. Obligating DNSPs to install meter isolation devices undermines the separation of contestable work in regulated businesses.

- » **There is a high likelihood that there will be latent unsafe conditions and there is a duty of care to not ignore obviously, or potentially unsafe installations**. This will invariably increase expected costs and these costs will be passed down to **all** DNSP customers, raising an equity issue between customers paying for works that do not benefit them.

- » A larger review would be required to
 - ascertain that this new proposal does not contravene other obligations or restrictions
 - confirm the changes do not negatively impact on a contestable market by allocating contestable work to regulated entities
 - ascertain the changes does not provide benefits to a customer at the expense of other customers.

Issues to consider

- » **Significant changes to DNSPs existing systems, work practices and resources would be required** to accommodate the new proposal. This incurs additional costs that have not been accounted for by DNSPs in their next regulatory reset period
- » Dealing with complex scenarios (such as unsafe installation, insufficient board space etc) are better resolved with the installation of the new meters, as opposed to separating the task of installing separate isolation devices and meters.
 - Combining these two tasks together allows for a better overall design because all key factors can be considered and would be more cost-effective
 - Separating the task increases rework, risks and costs

Some examples

- » This is an example where a rotted out meter board at a residential multiple occupancy site would need to be replaced. Under current industry requirements the existing accumulation meter cannot be re-installed and new interval meters must be installed. Therefore it would be more practical and cost effective for the Metering Provider to install the meter insulation device when installing the interval meter.



Some examples



- » Some conditions may require complete replacement such as this panel of legacy meters
- » Older sites are especially susceptible to less obvious but equally unsafe issues such as
 - Hidden and exposed wiring
 - Asbestos
- » These complications can also affect obligations to timeframes

DNSP Position

» Customer's assets

- Electrical installations beyond the Point of Supply should remain the responsibility of the Customer and their REC

» DNSPs do not support being obligated to install separate isolation devices

- It further clouds the intent of metering contestability and responsibilities in the industry
- There is a significant difference between the new proposal and the original rule change that it should be considered separately.

» We support the draft determination with the following amendments

- The timeframe should not apply to replacing a family failure of meters at a shared fuse because usually AEMO provides more than 12 months to replace these meters. Having a timeframe for this scenario provide little customer benefit
- There should be a mechanism for exceptions to the timeframe to allow flexibility for complex scenarios
- Customers should be allowed to plan mutually agreeable outage dates outside of the 25 business days to improve customer service at minimal cost
- An extension of implementation start to allow for system and process changes
- There should be no obligation to notify all affected retailers of the planned supply interruption via B2B
 - » There is limited space available at a switchboard to allow more than one metering provider to safely work at the same time.
 - » The requirement to co-ordinate increases with more parties involved, which will add complexities and cost for minimal benefit.
- Support the concept of DNSPs updating MSATS with shared fuse information **but do not** support providing the same information to Market Participants via B2B because this is a duplication of effort given that they have visibility of MSATS.
 - » This is a new data set and if it was to proceed, industry will need to be provided sufficient timeframes prior to obligations commencing to enable population of this data and implementing the required business changes.

Thank you



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CONSUMER GROUP VIEWPOINT

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INDEPENDENT CONSULTANT REVIEW

ARUP



Arup Review of Proposal for DNSPs to Install Isolation Devices for Shared Fuse Metering

AEMC Consultation Forum – 20 April 2020

What was considered:

1. Considered the proposal to nominate the Distribution Network Service Providers (DNSPs) to install isolation devices to each customer's individual connection.
2. Considered the NER and each jurisdiction's Service and Installation Rules to assess what arrangements were currently in place to conduct this work.
 - How much would this work cost?
 - Who did this work and how did it relate to the DNSP?
 - Could the DNSP have the work completed under a contestable arrangement?
 - If we assumed they could, then how would the costs be recovered and from whom?

Review of Proposal for DNSPs to Install Isolation Devices for Shared Fuse Metering

Costs:

1. Considered information provided by Vector AMS to assess likely numbers of sites.
2. Considered costs of a sample ASP quote to conduct this work and checked that against other publicly available data.
3. Built up an assessment that costs could be \$74M, with a range of +80%/-40%.
4. Uncertainty mostly driven by high uncertainty in number of sites.

Review of Proposal for DNSPs to Install Isolation Devices for Shared Fuse Metering

Use of *Network Device* provisions in Rules

1. Does installation of additional service protective devices meet the definition of *network device*? Possibly.

2. Does it meet the provision in the clauses in the Rules themselves? Uncertain.

‘a Local Network Service Provider must not use a network device to provide services to a retail customer or any other third party’

Clause 7.8.6(a)(3)) of NER.

Review of Proposal for DNSPs to Install Isolation Devices for Shared Fuse Metering

Service Definition under the Regulatory Framework

1. If considered a regulated activity, is it a *standard control service* or an *alternative control service*?
Concluded it is an *alternative control service*.
2. What limb under *alternative control service* does it fall under (Public Lighting, Type 5 and 6 metering or Ancillary Services)? Concluded it would be defined as an Ancillary Service.
3. How would costs then be recovered? It would be a fee levied to Retailers.
4. Could it be smeared to all customers? No, as this would be recovering *alternative control services* within *standard control services* (i.e through network prices).

Review of Proposal for DNSPs to Install Isolation Devices for Shared Fuse Metering

Who is responsible for the meter service panel?

1. Bodies corporate and landlords are not contemplated under the National Electricity Law or the Rules and other national instruments, but are recognised in jurisdictional instruments.
2. Little guidance from those instruments about how they relate legally to end use consumers/customers, nor to DNSPs, MPs, MCs and Retailers in terms of outages or any other supply issues.
3. Understanding the legal relationship with all the parties will be critical to a resolution to this matter. They function like an intermediary, but they have little relationship to any other party other than being responsible for the service equipment panel on which the meters are mounted.
4. This matter needs further consideration.

Review of Proposal for DNSPs to Install Isolation Devices for Shared Fuse Metering

Key Finding: Contestable Activity across the NEM

1. Main conclusion is that the installation of SPDs is a contestable activity in every jurisdiction, including Victoria.
2. This activity could not be considered a regulated service, as this activity is on the consumer's service equipment panel.
3. Any installation work or remediation work on a service equipment panel is currently carried out on a contestable basis.
4. This is therefore a jurisdictional matter.

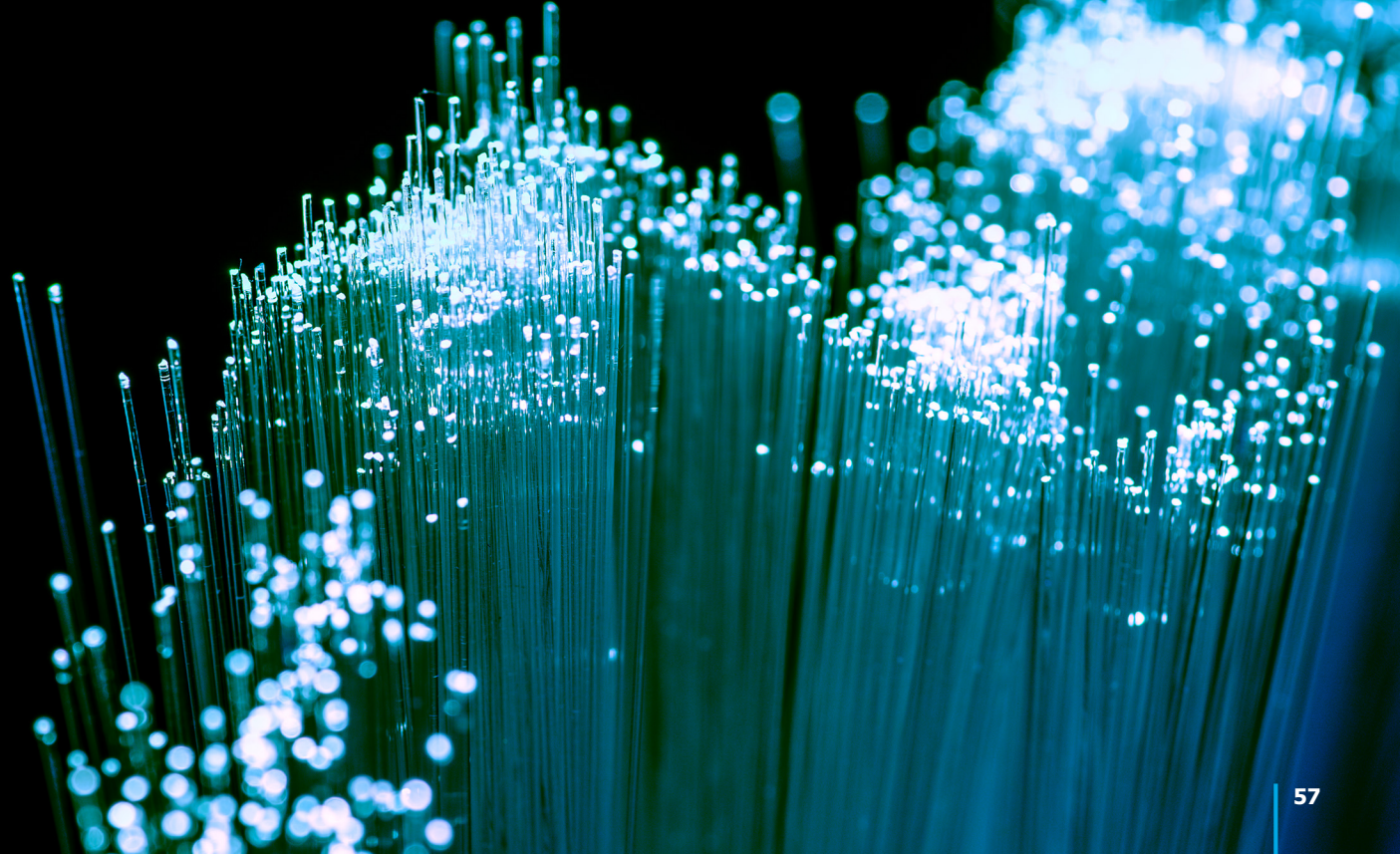
Review of Proposal for DNSPs to Install Isolation Devices for Shared Fuse Metering

Next Steps:

1. Perhaps the most appropriate pathway to resolution would be to add requirements into each jurisdiction's Service and Installation Rules for separate SPDs.
2. When a shared fused scenario arises, the MC could issue a notice to the body corporate or landlord giving them the option of accepting an interruption to all consumers in the premises or having the Service Equipment Panel upgraded to align with the revised Service and Installation Rules.
3. The body corporate or landlord would then have the authority to represent all consumers in the premises in advising the MC of the option selected and also to accept the costs of the work if the Service Equipment Panel is to be upgraded.

MARKET BODIES VIEWPOINT

AEMO



KEY DISCUSSION

PROPOSED ALTERNATIVE SOLUTION



Questions – the proposed alternative solution

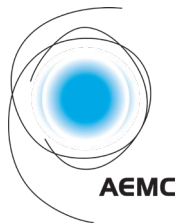
1. What would be the benefits of requiring DNSPs to install separate isolation devices at the first planned interruption, compared to the draft rule?
2. What are the costs associated with DNSPs installing separate isolation devices for all sites sharing fusing? Who should bear the costs of installing the isolation devices?
3. What complexities may arise when attempting to install separate isolation devices for all sites sharing a fuse at one time?
4. Is there anything else that we should consider in relation to the proposed alternative solution?

NEXT STEPS & CLOSING

STAKEHOLDER WORKSHOP

Next steps

- Notes from this workshop will be published on our website as soon as possible
- A recording of this workshop will also be published at this time
- If you wish to put in a **written submissions** they are due **24 April 2020**
- We are happy to have one-on-one discussions with stakeholders over the next week
- The **final determination** will be published on **21 May 2020**.



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