

Ms Jessica Robinson
Independent Pricing and Regulatory Tribunal
Haymarket, NSW, 1240

By email: http://www.ipart.nsw.gov.au/Home/Consumer_Information/Lodge_a_submission

2 November 2018

Retailer meter installation practices in NSW

The Australian Energy Council welcomes the opportunity to make a submission to the Independent Pricing and Regulatory Tribunal (IPART) review of Retailer meter installation practices in NSW.

The Australian Energy Council (AEC) is the industry body representing 21 electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. These businesses collectively generate the overwhelming majority of electricity in Australia and sell gas and electricity to over 10 million homes and businesses.

The Australian Energy Market Commission's (AEMC) rule change on expanding competition in metering and related services (competition in metering) was designed to open up competition in metering services and give consumers more opportunities to access a wider range of services. The introduction of competition in metering is the largest single change in electricity retailing since the introduction of full retail competition (FRC) itself, back in the early 2000s. And like the introduction of FRC, there have been some problems at go live.

In this submission AEC will not be addressing individual retailer performance or retailer processes. Retailers themselves are best positioned to unpack the operational intricacies of their own practices

IPART have found that retailers are not delivering an acceptable level of customer service to customers requesting a meter. The AEC does not intend to dispute IPART's assessment of industry performance in the period surveyed, other than to note, as IPART does, the considerable improvements over this period.

Given the concurrent AEMC Rule Change process, the development of an inconsistent regulatory treatment and experience for customer's arising from unilateral jurisdictional actions on metering installation by IPART is avoidable. We ask IPART to be mindful that the technical and operational issues arising from metering competition are being actively considered by the AEMC, who are addressing:

- Meter installation time frames;
- Planned interruption notices to large customers;
- Opt out and variation of the planned interruption notifications notice period, and;
- Other exemptions and transitional arrangements.

Given these are under active consideration, the AEC is mindful of the need for a proportionate and nationally consistent response to the concerns arising from the IPART report.

IPART recommendations

The IPART Draft Report explores situations where isolation issues exist that frustrate the deployment of meters. IPART recommend that, subject to necessary training and safety regulations, Metering Providers should be able to deploy the resources necessary to undertake all tasks associated with

installing a meter, including that they may:

- Operate any service fuse carriers required to de-energise a site for a meter installation,
- Conduct live isolation work, where necessary; and,
- Install ripple control relay devices, where required.

The AEC agrees that these are positive steps, especially for the NSW ASP service model.

The AEC does not support the IPART recommendation to allow MC's to:

- Provide planned interruption notices to affected customers on the spot.

The AEC do not support the ability for Metering Coordinators to issue a planned interruption notice to affected parties on the spot as there are particular risks associated with this practice in terms of life support customers may not be known to MCs or their subcontractors where they are customers that they intend to disconnect that are not identified in the service order that they have been requested to complete. In the AEC's view this problem will be best dealt as part of a multi-occupancy/shared fuse solution at a national level.

To address the multi-occupancy/shared fuse issue a more detailed regulatory model is required that addresses:

- The responsible coordinating body;
- The notifiable parties;
- Their responsibilities;
- Notice or communication requirements;
- Form of the notice or communication to use and take;
- Feedback loops, and;
- Cost recovery.

The above would not only address the metering requirement on the day, but also the coordination of other planned metering activity at a multi occupancy site that may then take place concurrently. The AEC in collaboration with the Competitive Metering Industry Group is currently preparing further materials for consideration by the AEMC in this regard.

Any questions about our submission should be addressed to David Markham by email to [REDACTED] or by telephone on [REDACTED]

Yours sincerely,

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