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Submission: Submission to IPART on Electrical POC

Submitted by: Paul Bennett

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Licensed Electrical Contractor and Level 2 ASP accredited with Ausgrid

Date: 20 June 2018

Issues with the change to POC

Because I have written a few pages for this submission I would like to start with the conclusion so it is not lost to the end of this document.

- Most Pressing Problem - The inability for ASPs to upgrade or make alterations to the meter boards without involving other parties to do the metering involving an impossibly complex array of organising.
- Solution – Allow ASPs to move existing meters either within a panel or to a replacement panel, the meter provider is then notified who can then visit the site at their convenience to either test and inspect or change the meter for a smart meter.
- Advantages – ASPs can do work in a timely and efficient manner, the impossible organisation of multiple retailers and meter providers at a single property remedied, customers are not inconvenienced, privacy of owners and tenants issues alleviated by only supplying the meter numbers to the meter providers.

More Detailed Description of the Issues

The limit of characters has been reached so I have put my details on my submission into the uploaded document.

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### More Detailed Description of the Issues

#### Removed the ability for ASPs to be a One Stop Shop

Previous system worked well the distributor issued the metering equipment directly to the ASP who installed it. The turnaround from the connection application to meter installation was less than a week, now it is a minimum of several weeks usually 6 to 8 or more.

This has made it hard to organise and complete any work associated with a switchboard upgrade. It is difficult if there is one electricity user at the premises, with the increase in granny flats where there are one or two unmotivated tenants to deal with is difficult.

In a multiple tenanted building the organisation becomes impossible. If a switchboard needs upgrading an ASP needs to contact all owners and/or tenants to contact their retailer to organise the changeover, it is an impossibility to get so many people to organise for the work to be done on the same day. People are not motivated to make the time to call their retailer and if they do they are told different things by each retailer because the retailers' procedures are different.

The privacy requirements is another factor that adds to the difficulty. It is fair to say switchboard upgrades are close to an impossibility in a multiple tenanted building. I have not tried to do a job with more than one retailer but I would not know how to go about organising all parties where there are many consumers and retailers involved.

The greatest problem being that tenants are unmotivated to organise their retailer, if they do start the process they quickly find that the effort and complexity is not worth their trouble in this busy

life. With granny flats I have found the best way is for the owner to put the account into their name first then negotiate with the tenant to contact a retailer to change over the account.

#### Inability to replace asbestos panels.

My first choice procedure for work on an asbestos panel, as per the risk reduction matrix, was to replace it. In the past the best way to do an upgrade of a switchboard is to replace the whole panel with a new non-asbestos panel. This is so difficult to organise now we are forced to upgrade the sub-circuit switchgear on to the asbestos panel and leave the metering as is. Sometimes the metering equipment needs to be moved to arrange the new switchgear in a neat and logical way, we end up with a sub-standard layout. Now having to involve a meter provider makes the job more difficult with weeks wait time and organisational time getting information from the consumer and time on the phone back and forwards, it is most frustrating.

#### Inefficiencies and extra costs

In addition to the inefficiencies mentioned above of the inability of being a one stop shop and the impossible job of organising multiply metering upgrades other inefficiencies are:

- Multiple visits

The previous system ASPs obtained the metering equipment and did the whole job in one visit. Now with some jobs the ASP may have to: 1<sup>st</sup> visit- do the work to prepare for the metering additions/alterations, 2<sup>nd</sup> visit- by the metering provider who will only live up to the main switch, 3<sup>rd</sup> visit- ASP must return to do any work to supply the installation beyond the main switch, usually a 10 minute job, but the tradesman needs to travel to the job and unpack tools and repack again after having already done so for the previous work. Some jobs may be able to be organised to have the meter installer come on the same day but this is difficult as the meter providers do not provide easy means of communication.

- Training

Previously the ASP did the training which enabled them to work on any distributors' metering equipment (with distributors' authorisation) now each meter provider requires their own training which can run into weeks to become authorised adding to the costs. I have been waiting 8 months so far to be advised of training available with Vector.

I am accredited with Acumen. I must complement Acumen on how easy it was to book training and become accredited. Acumen have been very helpful with supplying meters in a timely manner and the phone help they provided when I did my first job. The problem is that I can only do metering for Origin customers.

- Metering providers systems

Each metering provider has their own systems and apps that need training to be able to use, these systems are complex which is multiplied when more than one system is needed to be used on different jobs.

- Extra test equipment

Meter providers require extra test equipment costing 2 to 3 thousand dollars.

- Calibration of test equipment

Meter providers require the test equipment to be calibrated yearly. The cost to do this is between \$70 and \$450 per instrument, some providers require 3 instruments calibrated each year at a cost of several hundred of dollars. This is unnecessary as we or not taking

critical measurements in a laboratory environment. We are doing field measurements that do not require fine accuracy, the measurements are taken to confirm polarity, correct connections, earthing resistance and neutral integrity. The instrument required to perform neutral integrity (NST), according to the manufacturer, cannot be calibrated as it runs on software, all they can do is check the software is up to date. It could be argued that earth resistance is a critical measurement; electricians have been performing these measurements with uncalibrated instruments for decades with no reported problems. A tradesman can self-check an instrument by checking with a set of resistors. It could be argued that neutral integrity is a critical measurement as the pass for NSW (different in other states) is less than  $1.0\Omega$ . The manufacturer has said that the NST cannot be calibrated. The cost for the NST check is \$70 plus postage. Another problem is that an ASP cannot do work while the instruments are away for calibration.

- The many players

There are now too many layers within the meter supply chain adding to inefficiencies of large numbers of people involved and time spent on communication between players. With so many layers there are bottle necks in the system. The list organisations now that MUST be involved in a job are:

- Distributors
- ASPs
- Retail customer
- Retailers
- Meter Coordinators
- Meter Providers

The list people and/or organisations now that MAY also be involved in a job are:

- Electrical Contractors
- Owners
- Tenants
- Managing Real Estate Agents

### Legislation is complicated and confusing

Legislation complicated with many government bodies' involved in the system and a mountain of reading to be done. It is very confusing and difficult to know all of the legal aspects, we are tradesmen not lawyers. There should be courses to explain the whole system and how to comply with the laws and regulations.

### The public have not heard of POC

Other than those directly involved no one has heard of POC, even electrical contractors I have asked have not heard of POC, when explained to customers and other electricians they are confused how meter providers who are chosen by the retailers provide POC for anyone.

### Ring-fencing

Point Of Attachment (POA) faults

These faults commonly fault during the evening peak load time. Previously Ausgrid when called by a customer due to an outage could repair the POA, now the Ausgrid emergency tradesman cannot do the work and leaves the customer without power overnight. The customer who has no knowledge of the ring-fencing or who is authorised to do the work has to learn about what is an ASP, learn how to find an ASP and then find an ASP who is free to do the work the next day. My

experience is that Ausgrid electricians have become despondent due to loss of work satisfaction being unable to do the work they previously did to get customers back connected and now have to walk away and leave the customer without power to work things out.

Beyond the inconvenience of no power overnight and the possibility of no hot water the customer may lose any supplies under refrigeration. The customer who has to go to work the next day will find it very difficult to organise for the work to be done.

The cost of the work was previously free to the customer, but they now not only have to pay for the work but also the distributor inspection fee charged to the ASP when the NOSW is lodged for the repair work. A basic POA repair done by an ASP is in the region of \$400 to \$600.

## CONCLUSION

POC has made it hard or impossible to organise and complete any work associated with a switchboard upgrade.

With all the above said I feel the best solution is to go back to the previous arrangements where the distributor supplies the metering directly to the ASP, this system worked well. As the POC is now being legislated the solution to the mess we now have is to address the single most frustrating problem.

Most Pressing Problem The inability for ASPs to upgrade or make alterations to the meter boards without involving other parties to do the metering.

Solution Allow ASPs, as they were before, to move meters either within a panel or to a replacement panel, the meter provider is then notified who can then visit the site, at their convenience, to alter, test and inspect or change the meter for a smart meter.

The meter provider must attend the site in any case if the meter is to be moved or changed, so attending a site at the meter providers' convenience with the ability to schedule work in the same area on the same day will add efficiencies with the metering of their choice complying with the legislation.

Advantages ASPs can do work in a timely and efficient manner, the impossible organisation of multiple retailers and meter providers at a single property remedied, customers are not inconvenienced, privacy of owners and tenants issues alleviated by only supplying the meter numbers to the meter providers.

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