



31 October 2018

Independent Pricing and Regulatory Tribunal
New South Wales
PO Box K35
Haymarket Post Shop NSW 1240

Dear Sir/Madam,

Draft Report – Retailers’ metering practices in NSW – October 2018

The intelliHUB Group welcomes the opportunity to provide feedback to the Independent Pricing and Regulatory Tribunal New South Wales (IPART) Draft Report Energy – October 2018.

The recommendations in the draft report would seem to simplify the process for meter installations and complement the AEMC’s draft rule determination in reference to metering installation timeframes.

intelliHUB Group understands there to be 2 draft recommendations that IPART are proposing to introduce to assist in the removal of restrictions on MC’s and MP’s when undertaking metering tasks that are of interest to the intelliHUB Group:

1. That a level 2 ASP accreditation may be an excessive requirement for certain metering works and, subject to safety regulations, a lower level of accreditation should be available, so that Meter Providers can deploy the resources necessary to undertake all tasks associated with installing a meter, including:
 - De-energisation and re-energising service protection devices – operate any service fuse carriers required to de-energise a site for a meter installation
 - Working on energised electrical equipment – conduct live isolation work, where necessary
 - Installing ripple control relay devices in the Essential Energy distribution region – where required
 - Notifying other retailers’ customers of planned interruptions – provide planned interruption notices to affected customers on the spot.

intelliHUB Group agrees that items listed in category 1 would constitute some of the largest cause of delays for meter installations because they result in multiple visits and coordination between multiple parties.

intelliHUB Group would also like to call out a number of other situations that introduce delays to the meter installation process over and above the items listed by IPART:

- 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 and inclement weather
 - Customer refusal at time of metering installation
 - Customer requesting alternative date for metering installation
 - Remote locations of customer sites and potential incidents on route
 - Room on the existing switchboard
 - Inability to contact the customer
2. That retailers and the Department of Planning and Environment should include more detailed information about the process for applying for a meter, and the roles and responsibilities of the new parties on their websites.

In reference to recommendation 2, intelliHUB Group agrees that retailers providing information to the customer about:

- the meter application process, on their websites
- metering timeframes and expected cost, and
- customers' obligations in relation to the meter board, wiring and providing access

would also assist in expediting the meter installation process.

intelliHUB Group agrees in the main with the AEMC's draft determination proposed rule changes, but has some concerns in reference to the streamlining of the appointment of metering parties. intelliHUB Group has some concerns that this proposed change has not been volume tested.

The scenario put forward by the AEMC has suggested that the current MC being the LNSP objects to another MC being nominated and therefore slowing down the appointment process. This has not been our experience to date, the LNSP rarely objects.

This proposal does not allow the newly nominated MC an opportunity to object/decline when incorrectly selected by the FRMP. It is understood that MSATS has a reversal process but this is often very time consuming and can involve numerous phone calls and emails to resolve, adding further delay.

This is not considered a small change and would require system logic for a number of MC's to be reconfigured and therefore if it is insisted on progressing it should follow the full consultation windows that the market currently operates under and not to be expedited.

intelliHUB Group would welcome any further discussion in relation to this submission. If you have any questions or wish for further discussion, please contact Robert Lo Giudice on [REDACTED]

Sincerely,

Peter Birk

Group Chief Operating Officer - intelliHUB Group