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Australian Energy Market Commission

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**AGL Response ERC0275: Introduction of metering coordinator planned interruptions**

AGL Energy Limited (AGL) welcomes the opportunity to provide comment on the Australian Energy Market Commission's (AEMC's) Draft Determination and Rule (Draft Rule) ERC0275: Introduction of metering coordinator planned interruptions.

AGL understands that the Competitive Metering Industry Group (CMIG) will propose the AEMC consider a preferred Rule that Distribution Businesses use reasonable endeavours to install isolation points on all customers affected by shared fuses during the first interruption. AGL supports the proposal as we believe it will reduce the long-term costs for consumers by resolving all of the isolation issues for a site during the initial meter install once and for all. The need to record shared fuses would be reduced meaning that a process to notify by retailers and metering coordinators and record by networks would be limited.

Notwithstanding the CMIG proposal, AGL supports the Draft Rule that will:

- Require the Distribution Network to carry out the interruption and coordinate with the retailer, MC and other relevant parties in order to allow the retailer or MC (as applicable) to install a digital meter.
- amend the requirements to be covered within the AEMO's metrology procedure to require Distribution Networks to record shared fusing information as soon as practicable after becoming aware of the shared fuse arrangements.

AGL believes the AEMC can broaden the Draft Rule by requiring Distribution Networks to provide a market notice on when the planned outage will occur. This will allow other retailers and their MCs (not the initiating parties), to also undertake a meter replacement. This would be particularly advantageous in family and aged asset replacement scenarios, where the Distribution Network would have visibility of family failed meters. This approach would potentially minimise the amount of times consumers at a multi-site with a shared fused will have supply interrupted for a meter exchange.

AGL also welcomes the AEMC's clarification that at a retailer is able to interrupt supply to any of its own customers for the purpose of installing, maintaining, repairing or replacing metering equipment, not just the customer receiving the new meter. However, AGL believes that a retailer should be able to exchange all meters at this time. This will ensure customers at this site will only face one planned outage for a meter exchange. The AEMC should consider making a preferred Rule that allows retailers to exchange meters at this site without having to follow the complex and time-consuming retailer led communication process.

AGL believes adopting greater flexibility is in line with the AEMC's assessment framework and will not only provide certainty of installation timeframes and reduce installation delays, but also speed up the replacement of meters while reducing the occurrence of planned outages for customers with shared fusing.



The attachment contains specific information on the Draft Rule recommendations to support our position.

If you would like to discuss any aspects of our submission please contact Con Hristodoulidis, [christodoulidis@agl.com.au](mailto:christodoulidis@agl.com.au) or (03) 8633 6646, Senior Manager Regulatory Strategy.

Yours sincerely,

*(signed for electronic transmission)*

Elizabeth Molyneux  
General Manager Energy Markets Regulation



**ATTACHMENT**

<b>Draft Rule</b>	<b>AGL comment</b>
<p>Introduction of a 30-business day installation timeframe requirement on the retailer where the installation of a meter requires an interruption to other customers, and no other exceptions apply</p>	<p>AGL supports the Draft Rules</p> <p>We believe these two requirements will provide consumers at shared fuse sites with greater certainty with respect to when a meter exchange will occur.</p>
<p>Introduction of a 30-business day installation timeframe requirement for MCs to rectify metering malfunctions where the rectification could not be completed without interrupting supply to other customers, unless an exemption is sought from and granted by AEMO</p>	
<p>Where a retailer has requested a DNSP to carry out a distributor planned interruption to enable a retailer or an MC to effect a new meter installation or replacement, the DNSP must carry out the interruption within 25 business days, and it must coordinate the interruption with the retailer and other relevant parties in order to allow the retailer or MC (as applicable) to meet the relevant timeframe obligation</p>	<p>AGL supports the Draft Rule subject to the following comments:</p> <ul style="list-style-type: none"> <li>As per our comments to the Consultation Paper<sup>i</sup>, AGL believes the Distribution Business should provide a date of the planned outage at the site to all retailers that have customers at the site, especially for family failure and aged assets scenarios. In both these scenarios, the Distribution Business would have already sent a family failure / aged assets notification to Financially Responsible Meter Provider (FRMP) retailers at the site. Hence, if one of those retailers instigates the meter replacement at site and determines that there are shared fuses and notifies the Distribution Business to undertake a planned outage for the meter exchange, it would not be a difficult process for the Distribution Business to also issue the planned outage notice to other FRMP retailers at site. This provides the opportunity for these other retailers to also carry out the meter exchange on the nominated date.</li> </ul> <p>This should therefore not only provide certainty of meter exchange but also limit the amount of times consumers at the site will need to have supply interrupted for a meter replacement.</p>
<p>Clarification in the NERR on a retailer's right to interrupt supply to one or more of its customers and information to be provided to their customers when they receive a planned interruption notice</p>	<p>AGL acknowledges the clarification and offers the following feedback to further improve meter installation process.</p>



	<ul style="list-style-type: none"> <li>AGL believes in these circumstances once a retailer or their MC has identified that a shared fuse is at site and notified the Distribution Business to carry out a planned interruption, the retailer should be able to replace all meters at site, regardless of whether the meter exchange is due to a family failure, aged asset or has a standalone fault. This will minimise the interruption of supply at the site.</li> </ul> <p>Based on the Draft Rule, if the replacement is due to a family failure or aged asset scenario, the retailer can replace all meters on site under the Distribution Business planned outage notification. Hence, extending the replacement to a single meter fault, whereby the Distribution Business will already be issuing a planned outage notification at site, will provide efficiencies for meter replacement at site. It also avoids the possible negative customer experience, whereby the customer on the shared fuse questions why their meter is not replaced with an up to date and more modern meter while the outage is taking place.</p> <p>In this scenario, the AEMC could provide a fast track retailer led process where the retailer can inform impacted customers of a meter exchange.</p> <p>AGL believes extending the meter exchange in this scenario is also consistent with the Energy Charter objective of the industry working together to provide for a better customer outcome.</p>
<p>Introducing an obligation on DNSPs to record shared fusing information as soon as practicable after the shared fusing has been notified to the DNSP by the retailer or MC, or the DNSP has discovered shared fusing via its own work, - to be affected through a change in AEMO procedures</p>	<p>AGL supports Draft Rule subject to following comments:</p> <ul style="list-style-type: none"> <li>AGL believes the AEMC can make a preferred Rule whereby requiring the AEMO Metrology Procedure to change that will require Distribution Businesses who undertake a site visit for any reason to also inspect the site for and record if the site has shared fusing.</li> <li>On a technical matter, the MC is responsible for visiting sites hence they will have visibility of a shared fuse. From an efficiency perspective, the MC should notify the Distribution Business directly, rather than through the retailer, of the discovery of a shared fuse, and advise the retailer through current BAU processes.</li> </ul>
<p>Two information provision requirements:</p> <ol style="list-style-type: none"> <li>required DNSPs to send out shared fuse with meter malfunction notifications (for type 5/6 meters).</li> </ol>	<p>AGL supports the first information provision requirement as this will improve the efficiency of undertaking a meter exchange and therefore lead to a better customer outcome.</p>



2. require the retailer to indicate in its planned interruption notification whether the interruption is for the purpose of installing, maintaining, repairing or replacing the notified customer's meter, or another customer's meter.

Note our comment above about the retailer having the flexibility to carry out a meter exchange at a site with a shared fuse when the retailer is the FRMP for all meter connections.

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<sup>i</sup> Page 4, AGL submission to AEMC Consultation Paper, [Introduction of metering co-ordinator planned interruptions](#)