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Ms Alisa Toomey  
Project Leader  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Submitted online

9 October 2019

Dear Ms Toomey,

**Submission to the Australian Energy Market Commission's ("AEMC") Introduction of Metering Coordinator Planned Interruptions Consultation Paper**

The Energy and Water Ombudsman (SA) Limited ("EWOSA") welcomes the opportunity to comment on the AEMC's Introduction of Metering Coordinator Planned Interruptions Consultation Paper ("the Consultation Paper").

EWOSA is an independent Energy and Water Ombudsman Scheme in South Australia. It receives, investigates and facilitates the resolution of complaints by customers with regard to (*inter alia*) the connection, supply or sale of electricity, gas or water.

## **Background**

Following the *Competition in Metering and Metering Installation Timeframes* rule changes, the AEMC, the Australian Energy Regulator and the Australian Energy Market Operator held an industry workshop on electricity metering deployment with supply isolation issues. As an action from the workshop, the Competitive Metering Industry Group (CMIG) and the Australian Energy Council (AEC) were to consider drafting a rule change request on retailer planned interruptions.

On 20 May 2019, the CMIG submitted a rule change request to allow metering coordinators to arrange for a planned interruption for any customer for the purposes of installing, maintaining, repairing or replacing an electricity meter. CMIG is an industry body representing 7 electricity Metering Service Providers operating in the National Electricity Market (NEM). Collectively, these businesses install the majority of electricity meters in the NEM. The proponent developed the rule change request in consultation with the AEC.

As noted in the Consultation Paper, an interruption of supply is required in order for a new meter to be installed or for an upgrade of a customer's meter. Under the NERR, while retailers are able to arrange for a supply interruption of their customer for metering purposes, the retailer is unable to interrupt supply to another retailer's customer. The rule change request seeks to resolve the issue that metering providers are experiencing when attempting to interrupt supply to a customer who shares a supply service with one or more other customers.

## Submissions

Since 1 February 2019, EWOSA has received 10 metering delay cases involving interruption of supply to multiple occupancy premises. While EWOSA sees some merit in the rule change proposal from the CMIG, we also have some concerns about its implications.

### Customers receive inadequate communication

EWOSA is keen to ensure that adequate consideration is given to how communication with all affected customers is possible in this context, not just with those of the retailer for whom the metering provider (MP) is providing services. We submit that the rule change as it stands does not provide for this broader communication.

We are concerned about the situations where customers might not recognise the communication from the MP and realise that their supply is to be interrupted. This is of particular concern for vulnerable customers.

In terms of communication, we also believe that it is essential for MC's to confirm that all customers have had their supply restored prior to departure from the site.

### Customers left off supply

EWOSA is also concerned about situations which might arise where customers are taken off supply and the MP is unable to restore supply on the same day. EWOSA submits the following scenarios for when a MP has interrupted supply to a multiple occupancy site:

- network equipment is damaged by MP (e.g. fuse) and the necessary equipment or replacement parts are not on site
- the equipment consists of historic assets which require replacement
- the type of connection requires expertise of the distribution service provider.

These scenarios raise concerns for two reasons – they introduce a greater need for coordination between retailers, distributors and metering coordinators, which is already challenged at present. EWOSA also sees a recurring theme in cases of metering works being conducted with inadequate prior scoping, thereby adding to timeframes for resolution.

### Dispute resolution

The consultation paper posits the question of dispute resolution for multiple occupancy sites. EWOSA considers that the current dispute resolution channels ensure robust consumer protections because of to the relationship between the retailer and the metering coordinator, and the obligations of retailers to Ombudsman schemes.

Thank you for consideration of this submission. Should you require further information or have any enquiries in relation to this submission, please contact Jo De Silva via [jo.desilva@ewosa.com.au](mailto:jo.desilva@ewosa.com.au) or phone (08) 8216 1851.

Yours sincerely,



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