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

Submitted online

25 February 2020

Dear Ms Toomey,

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

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

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 (AEMO) 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 AEMC's 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.

The AEMC released its Draft Determination on 19 December 2019.

## Submissions

EWOSA supports the Draft Determination and the way it clarifies the existing responsibilities of distributors, retailers and metering coordinators for planned supply interruptions. EWOSA believes that the proposed introduction of timeframes for both retailers and distributors is essential for ensuring that both parties meet their obligations under the NER, as well as section 94 of the NERR. We particularly support the requirement on distributors to record the shared fusing information as soon as practicable through the AEMO's MSATS system.

We believe the Draft Determination appropriately addresses the consumer protection risks in the CMIG rule change proposal.

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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