

11 November 2016

Victorian Government
Department of Environment, Land, Water and Planning
Energy Policy and Programs

Sent via email to: metering.competition@delwp.vic.gov.au

Dear Sir/Madam

Transition to Metering Competition in Victoria - Option Paper Submission

Metering Dynamics appreciates the opportunity to provide a submission in response to the Transition to Metering Competition in Victoria - Option Paper consultation - October 2016, regarding the proposed changes to metering competition in Victoria.

Metering Dynamics has been operating in the National Electricity Market for many years, and is one of the most successful metering businesses in the Australian market.

In its consultation paper, the Victorian Government has sought stakeholder feedback on issues relating to metering competition. This submission provides Metering Dynamics' response to the issues raised.

Metering Dynamics would like to send a representative to your Department's proposed forum to discuss these issues, we will send details of our representative next week.

If you have any questions relating to this submission or wish to discuss any matters further please contact me.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Tom Cole".

Tom Cole
Metering Assets & Policy Manager



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Metering Dynamics Submission Transition to Metering Competition in Victoria - Option Paper

Topic: Option 2 - Full adoption with the Victorian metering specification

1. Do you support implementing metering competition in Victoria so that the current Victorian meter specification and/or the minimum service levels are retained?
 - Metering Dynamics supports the Victorian metering specification but considers Option 1 to be better aligned with a national standard that will evolve overtime.

2. Should other considerations about the respective capabilities of the meters and service levels be taken into account?
 - Customer driven competition will allow for disruptive innovation to push the capabilities of the meters, all service levels need to be carefully considered between all parties.

Topic: The alternative options to transition

3. Do you have any comments or views on Options 1, 3 or 4?
 - Metering Dynamics fully supports Option 1

Topic: Implementation safety and accreditation issues

4. Under Option 2, what additional measures should Victoria take in relation to meter installation and wiring safety, the safety associated with the use of the remote reconnection services enabled by smart meters, and community safety?
 - All meter installations/changes should comply with the current Service & Installation Rules, VESI Metrology Procedures and require a Certificate of Electrical Safety for Non-Prescribed Electrical Installation Work at a minimum.
 - For remote disconnection and reconnection the Metering Coordinator will engage their Accredited Metering Provider to carry out this service which is currently operated by the distributors MP already.

Topic: Consumer engagement

5. Under Option 2, which party or parties should be responsible for communicating the changes to metering arrangements to consumers, and should there be any communication role for the Victorian government?
 - Victorian government successfully implemented AMI rollout and should consider a similar consumer educating advertising campaign. All Retailers and Distributors could possibly take a more industry based approach educating Customers, REC's and Electricians.

Topic: Realising the expected AMI societal benefits and access regime

6. Under Option 2, would the introduction of access regulation for metering services in Victoria provide greater benefits than costs to Victorian households and small business?
 - Introduction of further competition will drive down metering prices but also open up greater data transparency/information sharing.
7. Under Option 2, will the introduction of access regulation for metering services in Victoria assist in preserving unrealised projected benefits attributed to the Victorian smart meter rollout (please quantify any benefits)?
 - With the introduction comes greater data transparency/information sharing that will benefit customers consuming under 160MWh similar to energy efficiency and data analysis reporting afforded to most large market customers.
8. Under Option 2, are there services that Metering Coordinators will not be able to provide that are currently being provided by electricity distributors? If so, what information and/or services will the electricity distributors need to obtain from Metering Coordinators in order to continue to realise these benefits?
 - DB will need to negotiate with MCs to obtain data and information services that they want to provide to others.
9. If an access regime is introduced, who would be the responsible regulator and how should it be funded?
 - No comment at this time based on available information.
10. What is the role for the Victorian Government in ensuring that the potential and benefits of energy data are unlocked through this process, including ensuring electricity distributors have appropriate access? Are there other mechanisms, other than the 'traditional' access regime model, that could be utilised?
 - No comment at this time based on available information.

Topic: Mandatory or opt-out

11. Should Victoria vary its current policy position that smart meters are mandatory and allow households and small business to opt-out of having a communicating smart meter?
 - No keep Victorian policy.

Topic: The "small customer" threshold

12. Do you support setting the small customer threshold at 160 MWh rather than 40 MWh as suggested by the AEMC? If not, please provide a reason.
 - No, 40MWh opens up further competition for Metering Contestability within Victoria.
 - Customer threshold is a very complex and confusing matter for both industry and customers. This needs to be addressed nationally with a simple and uniform approach adopted.

Topic: Regulatory changes for implementation

13. What regulatory changes would be needed to implement Option 2, and what considerations attach to these changes?
 - No comment at this stage.

14. With metering competition commencing on 1 December 2017, what timing issues does the Victorian Government need to be aware of, and how might these be managed?
 - No comment at this stage.

15. Are there any other factors or conditions that should be considered to successfully implement metering competition in Victoria?
 - For Low Voltage CT connections which entity will issue new Current Transformers and Metering Loom as per the Victorian Service & Installation Rules 2014, Clause 8.11.1 (The relevant Distributor who will supply the current transformers and standard 2.5mm² wiring loom up to a maximum length of 10 metres).
 - Who will own the customers Current Transformers and Voltage Transformers?