

3 May 2023

Submitted via Email: demenergymarketreform@sa.gov.au

Dear Brian Massey,

Proposed Amendments to *Electricity (General) Regulations 2012* and *Gas Regulations 2012* - Consultation Paper

PLUS ES welcomes the opportunity to provide feedback to the SA Government's Proposed Amendments to Electricity (General) Regulations 2012 and Gas Regulations 2012 – Consultation Paper.

PLUS ES is a registered Metering Co-ordinator (**MC**) and an accredited Metering Provider (**MP**) and Metering Data Provider (**MDP**) in the National Electricity Market (**NEM**). Our skilled, internal workforce provides metering services across Australia. Our customers range from small residential customers through to Australia's largest manufacturers and mining operators.

We acknowledge that metering installation practices have changed since 2012, especially with metering contestability introduced to residential customers on 1 December 2017. We support:

- In concept, the Department for Energy and Mining's (**DEM**) proposed electricity amendments and are an advocator for harmonisation/standardisation where practicable.
- A compliance timeframe of 6 months, post the effective date of the regulations as reasonable and achievable, where the scope of the proposed regulatory amendments is not altered. Any changes to the scope should trigger a revision of the implementation timeframe/s.

As a competitive metering service provider, we have a few reservations on the proposed amendments, especially with regulations which were applicable to South Australia Power Network (**SAPN**) and appear to have been transferred to the contestable metering provider (**MP**). Our feedback has been noted below for your consideration:

- **6—Amendment of regulation 54—Connection testing and inspection procedures:**
PLUS ES' preference for consistency is that all metering installers – and electricians that prepare an electrical installation for the installation of metering - comply with a standard set

of metering installation requirements. The drafting of this clause suggests the installer has the option to apply clause (a) or clause (b). Our recommendation is that the DEM:

- Selects one clause to apply to the regulations or
- Alternatively, the Office of Technical Regulator (**OTR**) adopts a set of connection testing and inspection procedures (metering installation rules), which still allows the MP the scope to innovate with their metering services.

- **69—Suitability of testing instruments:**

PLUS ES recommends that test records should be:

- Limited to calibration Completion and Next Due Dates, Test Lab ID and Test Report ID only (Test Lab is responsible for determining what parameters are tested, in accordance with manufacturer instructions) and
- Limited to include only the instruments used to complete the eCoC form - such as a voltmeter, ohmmeter, insulation resistance meter or NST device.

- **76A—Preparation, approval, publication, and purchase of metering installation rules:**

The Metering Installation Rules (**MIRs**) should be an agreed, common 'Interface Standard' defining how the Network interfaces to the customer's electrical installation, which is anything downstream of the SAPN Connection Point. This Standard has to be known to the customer's electrician prior to any MP being allocated, so that the electrician can build the electrical infrastructure to accommodate any MP's installation. PLUS ES has reservations that the drafting of the regulations which implies that multiple sets of available MIRs for one jurisdiction, could be more disruptive than beneficial and efficient.

An agreed, single set of MIRs doesn't stifle competition or innovation because it doesn't define what type of metering equipment is installed, or how it is maintained or operated. Instead, it defines key infrastructure items (type, size, location of metering enclosure, reserving space on meter board for metering equipment, accessibility of isolation devices upstream and downstream of meter etc.) so that the electrician can build the infrastructure in anticipation of any MP. Competitive Metering Industry Group (**CMIG**) members collaborated and drafted a set of MIRs. The CMIG MIRs are purposely written at a high enough level to accommodate the mandated jurisdictional differences such as, the SA Meter Isolator requirement. PLUS ES recommends that the DEM consider the CMIG MIRs as an alternative to individual MP requirements.

As a parallel, Queensland is consulting to replace the Network defined MIR's and adopt the CMIG MIRs as a standard for Queensland, on the basis that the Networks Energex and Ergon Energy now have only limited responsibilities in the area.

- **57—Electronic certificates of compliance—Technical Regulator may publish requirements etc:**

Whilst there are no proposed amendments made to this clause, PLUS ES wants to highlight the below notes for the OTR's consideration. This clause stipulates that the OTR sets the requirements for electronic Certificate of Compliance (**eCoC**), which the FSP fills out mandatorily for each smart meter installation. This online certificate declares that the installation has been carried out to be electrically safe etc., and there is provision to record extra details, if volunteered, including test results such as from the NST or similar measurements.

Details on the OTR website indicate that it will soon be mandated that two additional forms, a visual inspection and a detailed test form, to be added to the requirement. The detailed forms look suitable for an electrician building a new electrical installation with multiple subcircuits, such as building a new house. However, this appears to be excessive for a metering installation, where if mandated, the present eCoC could accommodate enough of the detail without overburdening the FSP.

PLUS ES would welcome further discussions in relation to this submission. If you have any questions or wish for further discussion, please contact [REDACTED] on [REDACTED] or at [REDACTED]

Sincerely,

[REDACTED]

[REDACTED]

Head of Metering Operations – PLUS ES