

15 September 2017

Metering Model SLA
AA4 Project Team
Western Power
GPO Box L921
Perth WA 6842

Email: aa4@westernpower.com.au

Dear AA4 Project Team,

Thank you for the opportunity to comment on the Model SLA (MSLA) that Western Power is preparing for its AA4 regulatory submission.

Costs

Change Energy supports the general reduction in metering costs proposed by Western Power. Change Energy believes moving to a fixed fee-only for Standard Metering Services is a reasonable approach that reflects the actual cost of the service.

As previously discussed, a cost-benefit analysis should be conducted to review the continued use of manually-read interval meters – comparing the costs of manually reading those with meters with the installation of communications equipment (Comms). Change Energy believes that it may be more cost effective to add Comms to existing meters which would lead to further decreases in Western Power metering costs.

Change Energy supports the reduction in daily read costs – the proposed amount is more consistent with the cost for this service as provided for in the competitive metering environment of the NEM.

Change Energy, however, does not support the new cost for the provision of historical (up to 12 months) meter data. We see no basis for this cost as there has been no change in the basic service (an overnight, rather than on demand service) that has been in place for 10 years. The data request is a simple database query that should involve minimal handling by staff. It should be pointed out as well that data storage and management costs have become significantly cheaper since the last SLA. Finally, adding this cost provides a cost advantage to the incumbent large retailers as they would already have this information in their system and do not necessarily need to request the data from Western Power.

Advanced Metering

Change Energy appreciates the work Western Power has done in scoping out the requirements for advanced metering infrastructure (AMI) as part of the AA4 process. As the electricity market continues to evolve, the need for data will increase and the provision of AMI will be key to enabling innovation in the sector.

Change Energy has concerns that Western Power is progressing with a solution that has not been widely shared with stakeholders. Further, were Western Power to progress with their own solution, it would inhibit competition in metering in the future. Of particular concern, would be the sourcing for meters from a single supplier without setting a specification that could also be provided by others. The technology regarding communications with the meters is also a concern. There should be open access and multiple pathways for any authorised party to access the meter and the data it collects.

Change Energy believes that before progressing with any roll out of AMI, a framework regarding open access, open source, technology, costs, and how AMI will help and not inhibit innovation should be developed with all stakeholders involved.

Change Energy would be happy to have further discussions regarding the issues raised in our response. Please contact Geoff Gaston if there are any queries.

Yours Sincerely,

Geoff Gaston
CEO