



**Submission to the Economic Regulation Authority:
Western Power's proposed model service level
agreement**

5 July 2019

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Executive summary

Matter	Western Power (WP) proposed model service level agreement (MSLA).
Context	<p>In August 2017 WP released its proposed new MSLA for public comment. Synergy currently pays approximately \$75M/annum to WP for the <i>metering service</i> provision to enable Synergy to transact with its 1 million customers. Efficient and effective metering installation and operational services with independent regulatory oversight is fundamental to retailers and generators to establish and maintain customer service in a market, particularly where currently there is no competition in the provision of such network services.</p> <p>On 25 August 2017 WP published its consultation paper inviting comments on its proposed MSLA amendments (Consultation Paper August 2017).</p> <p>In September 2017 Synergy submitted its detailed response to WP in relation to its proposed MSLA (Synergy MSLA submission No. 1).</p> <p>The Synergy MSLA submission No. 1 was provided to the Economic Regulation Authority (ERA) on 27 September 2017.</p> <p>In October 2017 the Authority published WP's response to Synergy's MSLA submission No. 1 (October 2017 MSLA). In a number of instances WP did not address Synergy's issues.</p> <p>In November 2017, Synergy submitted a second detailed submission to the ERA in response to WP's October 2017 MSLA (Synergy MSLA submission No. 2).</p> <p>In January 2018 the ERA published WP's updates to the MSLA revisions (January 2018 MSLA).</p> <p>On 10 June 2019 ERA published WP's revisions to its January 2018 MSLA (June 2019 MSLA) and invited public submissions.</p> <p>This submission sets out Synergy's position with respect to WP's June 2019 MSLA. Synergy has focussed on fundamental issues from previous submissions and a small number of new issues arising from the June 2019 MSLA.</p> <p>Synergy does not repeat all of the issues expressed in Synergy's September 2017 submission and its MSLA submission No. 2. Many of these issues remain as they have either not been addressed or not satisfactorily addressed.</p>
Scope	<p>Synergy's review of the June 2019 MSLA has focused on WP's most recent changes to the MSLA, including the need for regulatory consistency in relation to price control and invoicing of Reference Services that provide metering data.</p> <p>Synergy has also highlighted a number of concerns from its previous submissions that have not been addressed but are critical in terms of impact on customers and in ensuring compliance with relevant regulatory obligations. These include:</p>

	<ul style="list-style-type: none"> • Mechanisms to ensure WP is incentivised to meet service standards, including contractual and pricing terms that are reasonable and encourage WP to operate efficiently; • The need for efficient prices and regulatory oversight in relation to future price increases; • Reasonable service standard timelines that support the operation of the Code of Conduct for the Supply of Electricity to Small Use Customers 2018 and customer needs; • The need for clearer service descriptions and outcomes.
Key issues	<p>The terms, services, service standards and charges retailers pay under the MSLA for services provided by WP are typically passed through to the end use customer. Therefore, Synergy appreciates the opportunity to further consult on the proposed MSLA and also WP's assistance in understanding WP's most recent proposed amendments, and how these may impact end use customers.</p> <p>Synergy considers there continues to be a number of material issues with the June 2019 MSLA. These are:</p> <ol style="list-style-type: none"> 1. Synergy considers (and understands WP is of a similar view) that the pricing and price control for <i>reference services</i> should be managed under the access arrangement. Synergy supports adding the complete pricing structures for Metering Reference Services in the AA4 2020/2021 <i>price list</i> and considers this needs to be done for regulatory consistency. Please refer to Section B (under the heading "Regulatory inconsistency in relation to Price Control") of this submission. 2. Synergy, based on its discussions with WP, considers the MSLA does not correctly reflect how WP intends to charge for meter reconfigurations and communications when installing a new meter, replacing a non-compliant meter or exchanging a meter. Based on the current MSLA drafting, this could result in the unintended consequence whereby customers pay significant additional costs. Synergy considers several services and charging policies need to be clarified in the MSLA. Please refer to Section B (under the heading "Roll out of new and replacement meters funded under AA4"), and Part D (under the headings "Metering Infrastructure Charges" and "Comments on the various proposed Metering Services") of this submission. 3. Synergy has previously submitted a major MSLA deficiency is there is no clear contractual right for the counterparty to address the common situation in which <i>metering services</i> are not provided in accordance with the designated service standards. This means there is no incentive on WP to provide the service in accordance with the prescribed standard because there is no financial or regulatory consequence for not doing so. This outcome is inconsistent with the <i>Metering Code objectives</i> in clause 2.1(1) of the Electricity Industry Metering Code 2012 (Metering Code). Synergy notes this is not the case in relation to the agreements established under other metering frameworks such as – the NEM's "power of choice" – whereby regulatory consequences for failure to meet service standards exist. 4. Synergy's concerns, as expressed in its MSLA submission No. 2, in respect of service standards, performance incentives and charges remain largely unaddressed under the June 2019 MSLA. The June 2019 MSLA provides in some instances provides limited incentive for WP to meet service standards, operate efficiently or facilitate the operation of the Transfer Code and Code of Conduct. However, the MSLA as drafted appears to enable WP to ask for <i>metering services</i> payment¹ under the MSLA regardless of whether it meets the specified service standards.

¹ On request or submission of a service order under the Build Pack.

Synergy does not agree with this MSLA outcome. Please refer to Section B (under the heading "WP's contractual arrangements, service standards and performance incentives") and Section C (under the headings "MSLA clause 3.2 Service Standards" and "MSLA clause 9 Default") of this submission for further details on this matter.

5. Clause 6.6(1)(e) of the Metering Code requires WP to seek to achieve the lowest sustainable cost in relation to the provision of *metering services*. There is insufficient published information for users to determine if this has occurred in relation to certain *metering services*, as outlined in this submission. Synergy considers there are a number of inconsistencies in the MSLA in relation to setting and increasing charges that appear to indicate that some prices have not been based on the requirement in clause 6.6(1)(e) of the Metering Code i.e. seeking to achieve the lowest sustainable costs. Consequently, Synergy considers that the ERA must review WP's:
 - service standards and charges, including "benchmarking" them against comparable distributors in other jurisdictions; and
 - contractor service standard performance and costs; and
 - costs and service standard performance against alternative competitive meter service provider models in the NEM and New Zealand.

Please refer to Section B (under the heading "Annual increases to fees and charges") and Section C (under the heading "Metering Charges") of this submission.

6. From discussions with WP Synergy understands the additional metering charges in the MSLA, for the provision of remote *energy data*, are based on the cost of providing the data through cellular communications and not radio mesh communications. In other words, the MSLA does not contain charges for the provision of remote *energy data* via radio mesh communications notwithstanding the MSLA contains charges for the installation of radio mesh communications. Synergy notes the cost of providing the remote *energy data* through radio mesh communications can be substantially cheaper than through cellular communications, depending on topography and radio mesh coverage. However, as charges for the provision of remote *energy data* via radio mesh are not specified in the MSLA distinct from the cellular charges for provision of remote *energy data* it could be reasonably inferred from the current drafting that the MSLA charges apply to the provision of remote *energy data* irrespective of the communications technology. The outcome is that where remote *energy data* is provided through radio mesh communications *users* will be required to pay the more expensive cellular charge in the MSLA. Synergy considers the ERA should require the MSLA to contain both cellular and radio mesh prices, in accordance with clause 6.6(1)(e) of the Metering Code, for both cellular and radio mesh services. Please refer to section C (under the heading "Additional MSLA Data Charges for Covered Services under AA4 – MS-1 and MS-20") of this submission.
6. Synergy has outlined its understanding below, under the heading "Regulatory inconsistency in relation to Price Control", in relation to how new and replacement meter infrastructure will be rolled out. If this understanding is correct then Synergy considers the metering charges under proposed services MS-9(A-C), MS-11(A) and MS-15(B) to be reasonable. In Synergy's view these charges are at a level that will encourage the uptake of remote *metering services* and allow customers to benefit from the new services this infrastructure will provide.

A. APPLICABLE LEGISLATIVE REQUIREMENTS

Part B of Synergy's MSLA submission No.2 detailed the relevant legislative mechanisms and provisions applicable to Synergy's consideration of October 2017 MSLA. Those legislative provisions are applicable to this submission.

In these submissions, unless otherwise specified, *italicised* terms are defined terms and have the meanings given to them in the *Electricity Industry (Metering) Code 2012 (Metering Code)* or the *Electricity Networks Access Code 2004 (ENAC)*, as applicable.

B. OVERARCHING COMMENTS

Regulatory inconsistency in relation to Price Control

Prices for additional metering *Reference Services* contain two parts, the first being in the corresponding Reference Tariff and the second taking the form of an "additional charge" in the MSLA. In summary, Synergy considers the Reference Tariff in the AA4 *price list* should include the entire price (instead of part being in the MSLA). Further, that the ENAC *price control* framework be applied consistently to both the Reference Tariff and "additional charge". This is discussed further below.

The June 2019 MSLA contemplates *metering service* charges (or opex) under the Metering Code and the MSLA may be legally included in a Reference Tariff determined under the access arrangement for the period 2017 to 2022 (**AA4**) and the ENAC.

AA4 contains metering *Reference Services* M1 to M16 (with corresponding Reference Tariffs) and charges in the June 2019 MSLA under MS-1 (MS-1(B) – MS1(F)) and MS-20.

Charges under AA4 and the Price List

AA4 provides²:

“... The *reference tariffs* (including the *reference service (metering) reference tariffs* for *standard metering services*) are published in the applicable *Price List* in Appendix F of the *access arrangement*. A charge is payable by *users* to Western Power for services received under *access contracts* based on applying these *reference tariffs*.

Users who select an *additional reference service (metering)* for the relevant *exit service*, *entry service* or *bi-directional service*, may be required to pay an additional charge for the capital and non-capital costs that are incremental to the related *standard metering service*.

There is no charge to *users* in addition to the *reference service (metering) reference tariff* for the following *metering services* for so long as that is consistent with the *MSLA*...”

The additional charge is reflected in the *price list* (as a footnote to Table 21 ("Metering prices")³, in the Price List Information⁴ and the June 2019 MSLA.

Synergy notes the additional charge approach and concept was not subject to public consultation and *users* were not provided an opportunity to comment on the reasonableness of this approach as part of the ERA's various AA4 decisions.

The additional MSLA charges (i.e. additional to those charges in the AA4 *price list*) appear to be recovering non-capital costs in relation to the provision of *covered services* under the ENAC. In addition, the ENAC provides:

² Under Appendix E – Reference Services, Section 1.3 page 4.

³ Appendix F.5 2019/20 Price List (dated 28 February 2019), page 37.

⁴ Appendix F.6 2019/20 Price List Information (dated 28 February 2019), page 1.

“**reference service**” means a *covered service* designated as a reference service in an *access arrangement* under section 5.1(a) for which there is a *reference tariff*, a *standard access contract* and *service standard benchmarks*.”

“**reference tariff**” means the tariff specified in a *price list* for a *reference service*.

“**price list**” means the schedule of *reference tariffs* in effect in an *access arrangement* under section 5.1(f) and Chapter 8 for a *covered network*.”

“**price list information**” means a document which sets out information which would reasonably be required to enable the *Authority*, *users* and *applicants* to:

- (a) understand how the *service provider* derived the elements of the proposed *price list*; and
- (b) assess the compliance of the proposed *price list* with the *access arrangement*.”

Based on the ENAC requirements Synergy considers the additional MSLA charges should be included in the AA4 *price list* instead of the MSLA. Further Synergy queries whether, if the charges remain in the MSLA *users* have a legal obligation to pay for these *charges* as a *reference service*. Synergy considers the correct regulatory application is for non-capital costs in relation to *covered services* to be recovered through charges listed in a *price list*.

Therefore, the ERA needs to consider whether:

1. The concept of additional charges referred to in AA4 is consistent with the requirements of the ENAC, specifically chapters 6 to 8;
2. *Users* are legally obliged to pay these charges under their *access contract*.

The key issue – efficient and transparent price control of additional charges in the MSLA

Notwithstanding the charges for Reference Services are sought to be recovered under a contract and a regulatory instrument, Synergy’s key issue, as the State’s largest network user, is:

1. How will the ERA ensure charges outside of the ENAC framework (i.e. those charges under the MSLA that should actually be included in the *price list*) are efficient in accordance with the ENAC *price control* provisions?

Synergy’s key concern is not regulatory inconsistency per se, but rather does the inconsistency result in a lesser form of price control in relation to covered services? The ENAC has a rigorous *price control* framework to give effect to its objective of promoting the economically efficient investment in and operation and use of networks and services of networks in Western Australia via:

- the *price control* and *pricing methods* regime (Chapters 7 and 8 of the ENAC);
- a framework for information to be disclosed (including pricing information) for public consultation (Chapters 7, 8 and 9 of the ENAC); and
- A framework in relation defining *services* and terms relating to *services* (Chapter 5 of the ENAC).

The primary objective of the Metering Code is to support the operation of the *Code of Conduct for the Supply of Electricity to Small Use Customers 2018 (Code of Conduct)* and the *Electricity Industry (Customer Transfer) Code 2016 (Transfer Code)*. However, cost efficiency is a requirement of the Metering Code for MSLAs. Clause 6.6(1)(e) of the Metering Code requires that a MSLA must at least provide that the *charges* which may be imposed under a *service level agreement* may not exceed the costs that would be incurred by a *network operator* acting in good faith and in accordance with *good electricity industry practice*, seeking to achieve the lowest sustainable costs of providing the relevant *metering service*.

The Metering Code does not specify how this is to be achieved nor does it contemplate regulating elements of a *covered service*.

Clause 5.1(3) of the Metering Code provides that clause 5.1 (regarding the *network operator's* obligations to use reasonable endeavours to provide access to *metering services*) does not limit the ENAC and, in the event of any conflict or inconsistency between clause 5.1 and a provision of the ENAC, the ENAC is to prevail. Further, clause 6.15 of the Metering Code provides that the ERA, in considering whether to approve a MSLA under Division 6.2 of the Metering Code, must consider, and may give priority to, the "Code objective" in the ENAC. It is arguable that clause 5.1(3) of the Metering Code requires the ENAC to prevail in relation to an inconsistency in metering (reference) services, including the pricing for those metering (reference) services.

In this submission, Synergy has outlined several pricing inconsistencies and concerns in relation to the June 2019 MSLA (see in Section C of this submission below and Attachment 2 to this submission).

Synergy requests the ERA ensure:

1. The review of prices under the June 2019 MSLA relating to an AA4 reference service is not subject to a lesser price control standard than that specified in the ENAC;
2. The prices, price control and pricing methods WP has used to determine the charges under the MSLA are efficient; and
3. WP's pricing approach or framework ensures WP has sought and will continue to seek to achieve the lowest sustainable cost of providing the service (in accordance with clause 6.6(1)(e) of the Metering Code).

Provided the ERA confirms items 1-3 are met by the June 2019 MSLA, then Synergy considers the regulatory inconsistency between AA4 and the June 2019 MSLA (as detailed above) is largely an administrative matter that could be addressed in the AA4 2020/2021 *price list* or in the access arrangement for the period 2022 – 2027 (AA5).

Synergy understands that WP's preferred approach to pricing the new metering *reference services* is for the prices to be published in the *price list* either as a replacement of the current Table 21 or as an additional table to be read in conjunction with Table 21. Given AA4 (including the 2019/2020 *price list*) has just been approved, it may not be possible to update the *price list* until 2020/2021. Synergy is supportive of including the metering reference service prices in the *price list*, such that all charges for metering *reference services* will be reviewed and updated on an annual basis.

Roll out of new and replacement meters funded under AA4

Synergy considers the June 2019 MSLA needs to clarify how meter infrastructure (upfront) charges will be applied in relation to the roll out of new and replacement meters (including communication links). In addition, Synergy requests the ERA to ensure: (i) all of WP infrastructure charges under the MSLA comply with clause 6.6(1)(e) of the Metering Code and (ii) WP has sought to achieve the lowest sustainable cost.

Previously⁵ new and replacement meters were rolled-out in accordance with the minimum requirements under clauses 3.5 and 3.9 and Appendix 1 of the Metering Code. For example, previously a residential customer would receive a *Type 6* meter.

Therefore, it is important to understand how the new and replacement meters, funded under AA4 will be rolled out. Synergy's metering expenditure under the June 2019 MSLA is directly proportional to the charges customers will need to pay under the MSLA. This transparency is necessary to:

- understand the charges *users* will need to pass through to customers and the various scenarios that the charges will apply to.
- ensure there is no double recovery or that *users* are not having to unnecessarily pay for *metering services* (including for services they did not request⁶). For example, the June 2019 MSLA as drafted suggests customers will have to pay for the installation of a *communications link* even if the meter has already been installed with a *communications link* in accordance with the *mandatory link criteria*. However, based on Synergy's discussions with WP, Synergy understands this is not WP's intent.

Clarifying how meter infrastructure charges will be applied

Synergy requires the June 2019 MSLA to clarify how meter infrastructure (upfront) charges will be applied in relation to the operation of meter roll-out and communication links. The required clarifications are detailed below.

Meter infrastructure roll-out under the MSLA and charging policy	
New and replacement meters funded under AA4	The majority of the meters installed since February 2019 will be installed with a radio mesh NIC ⁷ . Approximately 20% of these meters are expected to be remotely enabled by July 2020. This number will progressively increase as WP's radio mesh coverage increases. Retailers will be notified as suburbs become remotely enabled. Under this meter replacement roll-out Synergy understands <i>users</i> will not be required to pay the MS-11(A) (radio frequency <i>communications link</i>) charges for the installation of a <i>communications link</i> . The MS-11(B) cellular <i>communications link</i> , for remote readings, is an optional charge and will apply to some meters ⁸ installed prior to February 2019 (pre-AMI) that were installed without a <i>communications link</i> .

⁵ Synergy understands since February 2019 *Type 4* meters are being installed as the minimum specification not *Type 6*.

⁶ Please see Synergy's further comments below (at pages 34 – 35) in relation to MS-12 communications link deactivation service.

⁷ Network interface card that will form part of the radio mesh *communications link*.

⁸ Older meters not capable of using the radio mesh NIC.

However, Synergy notes that based on the June 2019 MSLA prices it would be cheaper to change the meter than install a cellular *communications link*.

Meter infrastructure roll-out under the MSLA and charging policy	
Communications link installation on existing meters compatible with WP's radio mesh (AMI compatible)	<p>There are approximately 200,000 AMI compatible meters that can be remotely enabled. To enable this, <i>users</i> will have to pay:</p> <ul style="list-style-type: none"> MS-11(A) charge if there is radio mesh coverage; MS-11(B) charge if there is no radio mesh coverage. <i>Users</i> are not required to pay an additional charge to change the <i>communications link</i> when radio mesh subsequently becomes available. <p>No additional MS-15 reconfiguration charges are required to enable the delivery of interval data. A meter model list will be provided to <i>users</i> which details which meters are AMI compatible meters.</p>
Meter exchanges (MS-9)	<p>When a <i>user</i> requests a meter change – in the majority of cases the meter exchange will result in an AMI compatible meter containing a NIC being installed at the premises to provide the <i>user</i> with the requested metering energy data service. In this scenario the <i>user</i> is not required to pay the additional:</p> <ul style="list-style-type: none"> MS-11(A) charge to install and activate the <i>communications link</i>; or MS-15 charge to reconfigure the <i>meter</i> to provide the required metering data. <p>This scenario is dependent on the radio mesh coverage being available.</p>
Reconfiguration services (MS-15)	<p>Manual read meters: Manually reconfigure an accumulation meter to provide interval data (or vice versa). The MS-15(A) charge applies.</p> <p>Remotely enabled meters:</p> <ul style="list-style-type: none"> Remotely reconfigure the meter from providing accumulation data to providing interval data (or vice versa). The MS-15(B) charge applies. Remotely reconfigure the meter so that frequency interval data is provided. Eg. bi-monthly to monthly. The MS-15(B) charge applies.
Remote connection and disconnection	<p>The availability of this service will be communicated to retailers.</p> <p>The service may be used if the meter contains either a NIC or cellular remote communications in an AMI compatible meter. This service cannot operate on CT meter installations.</p>

Clause 6.6(1)(e) of the Metering Code requires that a MSLA must provide that the *charges* which may be imposed under a *service level agreement* may not exceed the costs that would be incurred by a *network operator* acting in good faith and in accordance with *good electricity industry practice*, seeking to achieve the lowest sustainable costs of providing the relevant *metering service*.

The MSLA does not contain a pricing information document nor require that one be provided by WP. Therefore, there is insufficient published information for *users* to satisfy themselves that WP has sought to achieve the lowest sustainable cost in providing the *metering services*.

Ensuring meter infrastructure charges are efficient

Synergy requests the ERA to ensure: (i) WP infrastructure charges under the MSLA comply with clause 6.6(1)(e) of the Metering Code and (ii) WP has sought to achieve the lowest sustainable cost in relation to specific metering charges specified in Attachment 2.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Advanced meter infrastructure (AMI) deployment, pages 10 - 13.
- Governance arrangements, pages 41 - 43.
- Proposed AMI implementation, pages 45 - 46.
- Metering expenditure, page 47

WP's contractual arrangements, service standards and performance incentives

Service standards, performance incentives and charges are largely unchanged under the June 2019 MSLA. Therefore, the issues raised in Synergy MSLA submission No.2 remain.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Performance incentives provisions, pages 27 – 28; 30 - 32.
- Scrutiny of WP's contractual arrangements, page 32.
- Service standards, pages 37 - 40.

MSLA Structure and Format

The proposed MSLA structure and format is complicated and consequently limits day-to-day operational use and business decisions. For example, the MSLA service numbers (codes) have changed making it difficult to track and understand the metering service changes under the June 2019 MSLA. Synergy has included a suggested layout in Attachment 1 which, from a major *user's* perspective, improves MSLA use and ease of operational understanding.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MSLA structure, page 40.

Annual increases to fees and charges

The October 2017 MSLA proposed fees and charges should increase annually via a CPI based formula. The June 2019 MSLA has proposed a similar approach but using a Wage Price Index (WPI) instead of CPI.

For the reasons set out in Synergy's MSLA submission No. 2 regarding the increase in fees and charges by CPI, Synergy requests the ERA to consider whether increasing fees and charges by the WPI is consistent with clause 6.6(1)(e) of the Metering Code. In its "Western Power Metering Model Service Level Agreement: Summary of Amendments" document (dated 7 June 2019), WP has simply stated that *"Several other amendments have been made following further consultation with Synergy, these include: ... Adjustment of escalation mechanism from Consumer Price Index (CPI) to Wage Price Index (WPI)".*⁹ WP has not explained how the WPI is consistent with it seeking to achieve the lowest sustainable costs of providing the relevant *metering service*.

Even if WPI escalation is required, it may be more appropriate and consistent with the requirements of the Metering Code for the ERA to approve WPI adjustment on a Western Australian, rather than a national, metric. The WPI might also be limited to the Western Australian public sector metric.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Fee adjustments, page 43.

Cancellation Service

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Cancellation service, page 137 – 138.

Definitions

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Fee adjustments, pages 48 - 60.

C. JUNE 2019 MSLA CONTRACT TERMS AND CONDITIONS

In relation to this Part C where Synergy had a concern in the October 2017 MSLA and this issue still remains in the June 2019 MSLA submission, Synergy has simply cross-referenced to its MSLA Submission No.2. Where a new issue has arisen, the issue is dealt with in this submission.

MSLA clause 1.2 Interpretation Act applies

Please refer to the matters raised in Synergy's MSLA Submission No.2:

Clause 1.2 Interpretation Act applies, pages 60 - 61.

⁹ WP, *Western Power Metering Model Service Level Agreement: Summary of Amendments*, 7 June 2019, p 3.

MSLA clause 2.1 Term

Please refer to the matters raised in Synergy's MSLA Submission No.2:

Clause 2.1 Term, page 61.

MSLA clause 3.1 Metering Services

Under the current MSLA, Synergy does not pay for the *metering services* unless the service has been completed and WP has provided Synergy with sufficient information to reconcile the charges.

However, clause 3.1(b) of the proposed MSLA contemplates *users* paying for services at the time when a service order (request) is submitted instead of when the service is completed in accordance with the terms and service standards under the MSLA. Consistent with what currently applies under the (2004) MSLA, Synergy considers the proposed MSLA needs to be drafted such that it is clear there is no obligation to pay for a *metering service* unless;

- it has been completed in accordance with the MSLA terms and service standards; and
- WP has provided sufficient information for *users* to reconcile the charges.

Such an approach is consistent with the *Metering Code objectives* in clause 2.1(1) of the Metering Code, and with the matters the ERA is required to have regard to under section 26(1) of the *Economic Regulation Authority Act 2003* (WA) (**ERA Act**) when reviewing and approving the MSLA (including sections 26(1)(a), 26(1)(b), 26(1)(e) and 26(1)(f)).

See further Synergy's comments under the heading "MSLA Clause 9 Default" in section C of this submission.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Clause 3.1 Metering Services, Page 61-62.

MSLA clause 3.2 Service standards

Synergy continues to have material concerns with the inclusion of clause 3.2 (unamended from the January 2018 MSLA) in the MSLA.

The *Metering Code objectives* require the Metering Code and the applicable documents approved by the ERA to facilitate the operation of the Transfer Code and Code of Conduct (clause 2.1(c), Metering Code). Therefore, service standards under the MSLA are fundamental to giving effect to the *Metering Code objectives* and more relevantly, ensuring electricity customers receive the service standards they are legally entitled to.

Retailers cannot be held accountable for reduced service standards to customers under the Code of Conduct if the MSLA permits WP to provide *metering services* to a standard that is less than those prescribed under the Code of Conduct. In these circumstance retailers will reasonably seek to legally protect themselves and customers may suffer a deterioration of service delivery as a consequence. For example, as previously submitted, clause 4.17(2)(a) of the Code of Conduct limits a retailer's right to recover from a customer an undercharge in excess of 12 months due, amongst other things, error, defect or default for which the distributor is responsible. In the event a distributor fails to undertake an actual meter read due to its actions within 12 months a retailer cannot recover electricity consumed in excess of 12 months.

WP has not addressed Synergy's concerns raised in MSLA submission No.2 to remedy a situation where WP has not complied with MSLA service standards. Synergy repeats and reiterates the submissions it made in its MSLA submission No. 2, including the submissions made in the context of:

- considering WP's compliance with the KPIs (see at MSLA submission No. 2, pages 63 and 64). If WP has a KPI to perform and deliver *metering services* in accordance with the service standards 95% of the time, what service standards apply to the remaining 5%? Synergy's customer base is over 1 million. A 5% non-compliance with the service standards affects a significant number of Synergy's customers;
- the situation where WP does not meet a service standard and requests the *user* to submit a new service notification (see at MSLA submission No. 2, page 63).

WP has retained the same drafting in clauses 3.2 as it did in the January 2018 MSLA. The circumstances WP is raising under the June 2019 MSLA clause 3.2 are not Force Majeure Events and are matters that all monopoly service providers and commercial organisations need to address. Further these matters are governed by law (including, for example, under the *Energy Operators (Powers) Act 1979* (WA)) and WP has the necessary statutory powers to address or remedy them. Synergy notes no similar dispensation exists in relation to WP not meeting its statutory requirements under its distribution licence.

Synergy repeats the submissions made in its MSLA Submission No. 2 that clause 3.2 is not acceptable and is inconsistent with clauses 2.1(1)(c) and 5.8 of the Metering Code – in relation to facilitating the operation of the Transfer Code and Code of Conduct. If clause 3.2 is approved in its current proposed form, this will require Synergy and other retailers to seek corresponding dispensations under the Code of Conduct in accordance with WP's proposal under MSLA clause 3.2.

Synergy also considers WP's proposal is inconsistent with the matters set out in section 26(1) of the **ERA Act**, which the ERA must have regard to when reviewing and approving the MSLA. In Synergy's view, clause 3.2:

- does not promote regulatory outcomes that are in the public interest or the long term interest of consumers (section 26(1)(a), ERA Act);
- does not promote fair market conduct (section 26(1)(e), ERA Act);
- will discourage investment and use of WP monopoly *metering services* including *covered services* that require metering field work (section 26(1)(f), ERA Act),

because there are currently inadequate incentives in the MSLA to ensure WP meets the service standards in the MSLA.

The ERA should not approve proposed MSLA clause 3.2 because:

1. It will have negative consequences for customers and the operation of the Transfer Code and the Code of Conduct – for example, if Synergy is unable to obtain metering data in order to fulfil its obligations under the Code of Conduct, it may be the subject of customer complaints to the ombudsman.
2. It is likely the MSLA will be used to substantiate WP's performance in relation to customer complaints.
3. It will not result in positive outcomes in relation to the matters contemplated under section 26(1) of the ERA Act, as detailed above.
4. It may legally require corresponding dispensations to be made for retailers under the Code of Conduct and their respective standard form contracts.
5. It reduces the obligations on WP, particularly in relation to life support customers who require an urgent re-connection under proposed service MS-8(B).
6. It creates regulatory uncertainty because it contemplates the ERA endorsing WP contracting out of its legal and statutory obligations.

7. There is no obligation on WP under the MSLA for WP to take steps to minimise the effects of clause 3.2(b) (unlike clause 8.2(b) that requires mitigating action in response to a Force Majeure Event). There is no reason why WP should not be required to use reasonable endeavours to minimise the effects of clause 3.2(b). In fact, failure to do so would be inconsistent with the Metering Code objectives in clause 2.1(1)(b) and 2.1(b)(c) of the Metering Code.

Finally, Synergy considers the ERA should also consider requiring a new provision to be added to the MSLA to give direct effect to clauses 2.1(1)(c), 5.8 and 6.6(1)(a)(i) of the Metering Code – that is, a provision requiring the service obligations under the Transfer Code and Code of Conduct to form part of the service standard terms under the MSLA.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Clause 3.2 Service Standards, pages 62-64.
- Performance incentives provisions, pages 27 - 28; 30 - 32;
- Service standards, pages 37 - 40.

MSLA clause 3.3 Request for metering services

Synergy considers clause 3.3 needs to cater for additional circumstances and work still needs to be done to ensure WP has developed a Build Pack compliant with the Metering Code following commencement of the new MSLA¹⁰.

Clause 3.3 provides that a *user* may request the provision of *metering services* under the MSLA by submitting to WP a "Service Order" in accordance with the Metering Code and the *communications rules*.

A *user* must, in relation to a network on which it has an *access contract* must comply (amongst other things) with the *communications rules* (clause 6.1(2), Metering Code). The *communications rules* form a part of the Build Pack and specifies the service order which the *user* must use to request a *metering service*.

Synergy has previously submitted there have been issues with the current MSLA because it is not clear which transaction in the *communications rules* should be used and WP can unilaterally change the Service Order, transaction comments and codes to be used at any time for a valid service request under the MSLA.

Therefore, clause 3.3 needs to also cater for circumstances where:

1. the MSLA does not clearly specify which Service Order must be used to request the service in the MSLA; or
2. a Service Order cannot be provided under the Metering Code or the *communication rules*.

¹⁰ Synergy considers following the commencement of the new MSLA (as approved by the ERA) the ERA will need to review and approve amendments to the *metrology procedure*, *mandatory link criteria* and *communication rules* (incorporating the Build Pack) to align with the operation of new MSLA and the roll-out of metering infrastructure.

In these situations *code participants* should be permitted (pursuant to clause 5.1(a) of the Metering Code) to make a service request using electronic communication. In this regard, Synergy notes clause A4.1(2) of Appendix 4 to the Metering Code requires WP to develop a *metering service order* form suitable for transmission by electronic communication for use by *users* and may make a *metering service order* form available on its website. Synergy considers this addition should deal with the uncertainty in relation to the Build Pack not being kept up to date or inconsistent with WP's system operations. It is also consistent with clause 6.6(1)(g) of the Metering Code, which requires a MSLA to specify the procedures for a *code participant* to make a request for *metering services* ("Metering Service Order") and the procedures for dealing with a Metering Service Order.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Service Orders, pages 92-93.

MSLA clause 4 Financial covenants by user

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Clause 4 Financial covenants by user, pages 64 – 65.

MSLA clause 4.1 Metering service charges (metering reference tariffs)

Please refer to Synergy's comments under the heading "Regulatory inconsistency in relation to Price Control" above at pages 6 – 8.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- pages 15-19, in relation to service classifications and the delineation between the ENAC and Metering Code.

MSLA clause 5 Invoicing and payment

The revised MSLA does not address the concerns and requirements raised in Synergy's MSLA submission No.2.

Synergy's earlier submission proposed an obligation (similar to that in WP's current model ETAC) to the effect that a *user's* obligation to pay only commences once WP has provided all the necessary data that allows a *user* to independently reconcile and determine how the charges were derived. Synergy also proposed, as a result of its past experience with WP, that a carve-out clause be included (similar to that in the model ETAC) to the effect that WP must not invoice charges in respect of services:

- performed outside of the MSLA;
- performed more than 12 months ago;
- that have not been completed;
- that are the subject of an ombudsman complaint.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- page 58, in relation to payment and invoice errors.
- Clause 5 Invoices, pages 65 – 69.

MSLA clause 6 Representation and warranties

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Clause 6 Warranties, Page 69 – 70

MSLA clause 7 Liability

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Clause 7 Liabilities and damages, pages 70 – 71

MSLA clause 8 Force majeure

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Clause 8, Force Majeure Expenditure, page 72, regarding the operation of clause 8.2(a) of the MSLA.

MSLA clause 9 Default

Clause 9 of the June 2019 MSLA sets out the procedure for dealing with a *user's* default in the due and punctual payment of amounts payable under the MSLA. WP has not addressed the matters Synergy has previously raised in its submissions requesting that:

- WP should not suspend Extended Metering Services where a dispute is unresolved; and
- a *user* will not be in default of the MSLA if it does not pay any amount due under the MSLA because WP has not:
 - complied with the Metering Code in relation to providing data and updating *standing data*;
 - met the service standards under the MSLA; or
 - performed any its other obligations under the MSLA.

Under WP's proposed MSLA, a *user* is required to pay for a service at the time the *user* requests the service (see proposed clause 3.1). Under proposed clause 9(a), if the *user* does not pay for the service at the time the *user* requests the service, the *user* will be in Default.

As Synergy has previously submitted, there may be circumstances where Synergy validly withholds payment for services. For example, because the customer disputes that WP has actually performed the *metering service*. The June 2019 MSLA does not (and neither have WP's previous proposed versions of the MSLA) recognise these circumstances and does not include a mechanism for Synergy to dispute charges; non-payment automatically means the *user* is in Default, and the provision of Extended Metering Services can be suspended if the Default continues for more than 20 Business Days.

In Synergy's view, for the reasons set out below, proposed clause 9 is inconsistent with:

- clause 6.6(1)(a) of the Metering Code, which requires the MSLA, at a minimum, to specify the *metering services* that the *network operator* must provide to *Code participants* on request (which must include at least all the *metering services* that the Metering Code, the Code of Conduct and the Transfer Code require the *network operator* to provide);
- all of the Metering Code *objectives* in clause 2.1(1), namely –
 - the promotion of the provision of accurate metering of electricity production and consumption;
 - the promotion of access to and confidence in data of parties to commercial electricity transactions;

- the facilitation of the operation of Part 8 and Part 9 of the *Electricity Industry Act 2004* (WA), the Transfer Code and the Code of Conduct;
- the matters the ERA is required to have regard to under section 26 of the ERA Act when reviewing and approving the MSLA, including:
 - section 26(1)(a) – the need to promote regulatory outcomes that are in the public interest;
 - section 26(1)(b) – the long term interests of consumers in relation to price, quality and reliability of metering services;
 - section 26(1)(e) – the need to promote competitive and fair market conduct;
 - section 26(1)(f) – the need to prevent abuse of monopoly or market power.

Under proposed clause 9(a), WP is able to suspend Extended Metering Services if the *user's* Default continues for more than 20 Business Days. In those circumstances, proposed clause 9(b) provides that the *user* If WP is able to suspend Extended Metering Services (under proposed clause 9(a)), it must continue to provide the Standard Metering Services in respect of the Metering Points which are affected by the suspension.

As noted above, clause 6.6(1)(a) of the Metering Code requires the MSLA to specify the *metering services* that the Metering Code, the Code of Conduct and the Transfer Code require the *network operator* to provide. If WP suspends the Extended Metering Services, there is a potential for the operation of the Transfer Code to be affected. End-use customers will therefore be affected as the *network operator* is not performing its obligations under the Transfer Code.

For example, clause 4.10(1) of the Transfer Code requires a network operator, on receipt of a valid customer transfer request, to (amongst other things), ensure that either a scheduled meter read or a special meter read (as applicable) is conducted for the contestable customer on the "nominated transfer date". A special meter read is service MS-19 (Non-Schedule Special Meter Reading) in the proposed MSLA. MS-19 is an Extended Metering Service. If WP suspends the provision of Extended Metering Services under clause 9 of the MSLA, the meter read for the affected contestable customer cannot be conducted.

It is also not clear from proposed clause 9 whether, in circumstances where Extended Metering Services are suspended, a *user* will be able to request Ancillary Metering Services (as defined in the MSLA). Ancillary Metering Services include MS-3 (Standing data provision) and MS-4 (Historical Energy Data provision). These services are essential to the operation of the Transfer Code. If WP does not provide these services, there is a potential for the operation of the Transfer Code to be affected. At a minimum, Synergy suggests that proposed clause 9 is amended to expressly note that WP will continue to provide Ancillary Metering Services.

For example, clause 4.15 of the Transfer Code deals with rectification of an erroneous transfer of a contestable customer to retailer. Under clause 4.15, the network operator must act in good faith to ensure that the rights and obligations of the affected contestable customer are as they would have been if the erroneous transfer had not occurred. As a part of a transfer of a contestable customer, a retailer is provided with energy data. If a contestable customer has been erroneously transferred, the affected retailer will not have the correct *energy data* or *standing data* in order to bill a customer. If Ancillary Metering Services MS-3 and MS-4 are suspended, it is unclear how WP can meet its obligations under clause 4.15 to correct the erroneous transfer and consequently for the retailer to accurately bill its customer.

Synergy has not been provided with sufficient time to understand the practical and legal implications of suspending Extended Metering Services (and potentially Ancillary Metering Services) under proposed clause 9 and therefore, seeks the ERA to consider the impact of this proposal in relation to:

- the Transfer Code and Code of Conduct;
- WP's existing statutory obligations under the various regulated instruments;
- WP's proposed MSLA clause 3.2;
- the matters contemplated under section 26 of the ERA Act (in particular, having regard to the long interests of consumers, and the need to prevent the misuse of market power in circumstances where WP is the only *metering services* provider in the SWIS).

In addition, Synergy also requests the ERA to address the matters raised in its MSLA submission No. 2.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Clause 9 Default, pages 72 -73.

MSLA clause 10 Disputes

It is not clear if the proposed provision gives Synergy the ability to resolve a dispute through a different mechanism instead of using the procedure set out in Part 8 of the Metering Code. Synergy seeks flexibility in the use of different dispute resolution mechanisms depending on the dispute event.

Synergy acknowledges that Part 8 of the Metering Code sets out the procedures for dispute arising under the MSLA. However, Synergy considers that certain types of disputes – for example, disputes concerning the interpretation of a single provision of the MSLA – would more efficiently and cost effectively be dealt with under an alternative dispute resolution form. This is consistent with both the *Metering Code objectives* and the ENAC objective, and also with section 26(1)(b) of the ERA Act (to promote the long term interests of consumers in relation to the price of *metering services*).

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Clause 10 Disputes, page 74.
- Clause 14.11 Further Assurance, pages 74-75

MSLA clause 13.3 Variation

For clarity, Synergy recommends clause 13.3 of the MSLA is amended to provide that:

1. variations require the signed agreement of both parties; and
2. WP is not permitted to unilaterally suspend Metering Services.

In the past services have been suspended contrary to clause 6.6(1)(a)(i) of the Metering Code, without Synergy's agreement. WP should not be permitted to unilaterally suspend *metering services*. If WP were allowed to unilaterally suspend *metering services*, then *users* should be relieved of effected obligations under the Transfer Code and Code of Conduct.

Synergy considers the suspension of *metering services* is a variation that needs to be agreed to in writing by a duly authorised representative of both parties. Synergy recommends the following underlined changes be made to MSLA clause 13.3 to address the concerns outlined above:

13.3 Variation

A purported agreement between Western Power and the *user* to suspend (except in the case of a Force Majeure Event), revoke, substitute or amend any provision of this Agreement has no effect unless it is in writing and signed by a duly authorised representative of both parties.

The proposed change is consistent with MSLA clause 13.7, which requires a written waiver notice to be signed by a duly authorised representative.

MSLA clause 13.11 Further assurance

Synergy considers this provision should be expanded to include an obligation to cooperate similar to the ETAC in relation to Code of Conduct and Transfer Code.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Clause 14.11 Further Assurance, pages 74-75

D. METERING SERVICES

All metering services – service descriptions

The proposed revisions to the MSLA require:

“...This Schedule should be read in conjunction with the *Code, Electricity Industry (Customer Transfer) Code 2016 (WA)*, *Code of Conduct for Supply of Electricity to Small Use Customers 2018(WA)*, Western Power's Metrology Procedure and Communication Rules (which incorporate the Build Pack)...”

As outlined in Synergy MSLA submission No.2 Synergy considers this does not give sufficient detail about what will actually be provided by WP. The service descriptions must, consistent with clauses 6.6(1)(a)(i) and 6.6(1)(b) of the Metering Code, detail the end to end service (including by when *standing data* notifications must be given to retailers) – that is, not just WP's field work or site activities.

For example, under the Code of Conduct, Synergy is entitled to disconnect a customer if a customer fails to pay a bill (clause 7.1). Synergy may request WP to undertake a de-energise service (proposed service MS-7). According to the Service Standards in Schedule 4 to the MSLA, WP is to complete the de-energise service (assuming the customer is within the metropolitan area) within 3 Business Days of acceptance of the Service Order (if the service is requested before 3:00pm on a Business Day) or within 4 days of acceptance of the Service Order (if the service is requested after 3:00pm on a Business Day). As previously submitted, in Synergy's experience, there have been occasions where WP has viewed the timely and correct provision of *standing data* as secondary to the completion of the field work (in this case, to physically de-energise the connection point). Without the update to the *standing data*, Synergy does not know when the connection point has been de-energised. For example, during that intervening period, the customer may have been consuming electricity. Synergy is then left with an additional amount of debt that it needs to recover from the customer.

Finally, Synergy understands WP will be undertaking market consultation in relation to changes to the Build Pack and will be doing so independently of the ERA. Therefore, it is important to note that as a result of amendments to the MSLA, there will need to be corresponding changes made to the *metrology procedure* and *mandatory link criteria*. These documents must comply with clause 6.5 of the Metering Code. Therefore, Synergy requests the ERA, in accordance with clause 6.20(2) of the Metering Code, to undertake a review of the *metrology procedure* and *mandatory link criteria* prior to WP making changes to the Build Pack¹¹.

¹¹ The roll-out of metering infrastructure and provision *energy data* and *standing data* is detailed under the *metrology procedure*, *mandatory link criteria*, Build Pack and Appendix 1 to the Metering Code. These instruments have been designed to cater for arrangements that were in place prior to WP's current implementation of metering infrastructure with remote radio mesh communications. Therefore, there are

Please refer to the matters raised in Synergy’s MSLA submission No.2:
Response to: “Service descriptions”, pages 38-40

Metering Charges

Synergy has delineated the discussion on charges below to:

1. metering infrastructure charges for the installation of metering equipment (that is, *communications link*) to enable the provision of *energy data*; and
2. metering data charges (outlined in Attachment 2 to this submission) for the provision of *energy data*.

Metering Infrastructure Charges

Synergy understood, from the October 2017 MSLA and WP’s AMI public forums, that the new and replacement meters¹² (under proposed services MS-2 and MS-6) will be rolled out and installed with a *communications link*, and in those circumstances, *users* and customers would not need to pay an additional charge to install a *communications link*.

Pursuant to clauses 3.5, 3.16(2) and 3.9 (and Appendix 1) of the Metering Code:

- *Types 1-3* meters: are interval meters and must have a remote *communications link*. Usually installed in very large commercial operations.
- *Types 4* meters: are interval meters and must have a remote *communications link*.
- *Type 5* meters: are interval meters (manually read).
- *Type 6* meters: are basic accumulation meters. Primarily installed at residential premises and requires WP to provide a meter reading for billing purposes in accordance with the Code of Conduct.

Synergy understand that the new meters¹³ record and provide *interval energy data* but can be registered to provide *energy data* as a Type 4, 5 or 6 meter. In addition, Synergy understood WP’s “AMI” roll-out initiative during AA4 was based on rolling out new and replacement Type 4 meters¹⁴. That is, the meters would contain a radio frequency *communications link* that would automatically activate when WP’s (radio mesh) communication back-bone became operational (which is anticipated to occur in July 2020).

The June 2019 MSLA does not provide this clarity and appears to contemplate that *users* and customers would have to pay an additional charge to install (or activate) a *communications link* to access remote services.

The June 2019 MSLA drafting appears to suggest that the infrastructure charges may be applied as outlined in the table below.

Product Change Scenario – Upfront Infrastructure Charges			
Customer who requires the 3 Part time-of-use reference service			
MS-9(A) Meter change		\$64.55	Total upfront infrastructure charge \$149.12
MS-11(A) Radio frequency communications		\$64.55	
For remote data provision			

currently (and until amendments are made, there will continue to be) inconsistencies between these documents.

¹² Funded under AA4.

¹³ That started being installed in AA3 and will continue to be installed during AA4.

¹⁴ Funded under AA4.

MS-15 (B) Remote Reconfiguration For data provision	\$20.02	
MS-9(A) Meter change	\$64.55	Total upfront infrastructure charge \$193.65
MS-11(A) Radio frequency communications For remote data provision	\$64.55	
MS-15 (A) Manual Reconfiguration For data provision	\$64.55	
Note: Based on Synergy’s discussions with WP – Synergy understands this application of the upfront charges is not the intended cost stack. Consequently, the June 2019 MSLA drafting needs to be amended to make the charging methodology clearer in terms of specifying the circumstances in which the charges will be applied. For example, where a faulty accumulation meter is replaced it will already contain a radio mesh <i>communications link</i> and it should be clear that there is no separate charge for a radio mesh <i>communications link</i> .		

If the current drafting in the MSLA is correct, then these charges seem to suggest implementation of remote reads is not efficient as the charges do not include the provision of the meter, reconfiguration and remote communications. Customers will still need to pay an additional \$149.12 (or \$193.65 in total) for a meter change, reconfiguration and remote communications. Synergy considers the additional metering charges in relation to MS-1 are excessive – why does it cost an extra 12 cents/day for interval data if the customer has already paid for the meter, reconfiguration and remote communication?

If the current drafting in the MSLA is correct then Synergy would find it difficult to explain these charges to its customers, especially why remote readings are more expensive than manual reads. Synergy understands this was a key issue in Victoria (following the roll out of smart meters) where customers felt they had to pay more to receive the same bill with no other benefit. Therefore, based on the proposed upfront infrastructure charges, it will be difficult for Synergy to use interval data *Reference Services* unless customers are willing to pay the upfront infrastructure and ongoing data costs under the AA4 *price list* and the MSLA.

Synergy outlined its concerns at pages 9 – 11 above (under the heading "Roll out of new and replacement meters funded under AA4") that the MSLA, as currently drafted, could result in additional metering infrastructure charges applying in circumstances that were not intended by WP. Assuming Synergy has correctly understood WP's intention, and the MSLA is amended to reflect this intention, then Synergy considers the charges for the following services (as set out in the table immediately below) to be reasonable:

- Meter exchange charges under MS-9(A) and MS-9(B), assuming the new meter exchange includes a radio frequency communications link or NIC.
- Meter exchange charges under MS-9(C) for a current transformer meter.
- Installation and activation of a radio frequency communications link under MS-11(A) for existing meters compatible with WP's radio mesh communication network.
- Meter reconfiguration charges under MS-15(B) for a remote reconfiguration.

ID	Service Description	Fee (\$ per unit unless otherwise stated)	
		Metro	Country
MS-9	Meter exchange		
A	Single phase whole current meter	64.55	137.05
B	Three phase whole current meter	64.55	137.05
C	Current transformer meter	64.55	137.05
MS-11	Communications link installation		
A	Radio frequency communications link	64.55	137.05
MS-15	Meter reconfiguration		
B	Remote	20.02	20.02

In Synergy's view these charges will encourage the uptake of remote *metering services* and allow customers to benefit from the new services this infrastructure will provide.

Additional MSLA Data Charges for Covered Services under AA4 – MS-1 and MS-20

As discussed at pages 6 – 8 above (under the heading "Regulatory inconsistency in relation to Price Control"), the June 2019 MSLA contemplates:

1. charges for *covered services* under the ENAC may be legally imposed under a MSLA (and Metering Code); and
2. these charges may be legally determined and approved by the ERA outside of the *access arrangement* consultation, *price control* and approval process in the ENAC; and
3. *users* are legally required to pay these charges (**Additional Covered Service Charges**).

The Additional Covered Service data Charges are detailed under the following MSLA services MS-1 and MS-20:

New MSLA Service to provide metering data	Applicable Covered Service under AA4
MS-1 Scheduled Energy Data Provision	M1 – M15 (Provision of <i>energy data</i>)
MS-20 One-off manual interval data	M16 (One off manual interval read) Provision upon request of <i>interval energy data</i> collected as a manual read from an interval meter registered as an <i>accumulation meter</i> .

The service standard and charges for these services are listed below, together with the service standard and charges for the MS-19 service.

Synergy makes comment below on the inconsistencies it sees with the proposed charges for the services.

MS-1 Scheduled Energy Data Provision

No.	Meter Service Description	Service Standard (Business Days)		KPI
		Metropolitan	Country	
Reference Services Metering				
MS – 1	Scheduled Energy Data provision	1/2	1/2	99%

No.	Data Description	KPI
1	Accumulated Energy Data	95%
2	Interval Energy Data	95%

ID	Service Description	Fee (\$ per unit unless otherwise stated)	
		Metro	Country
Additional Metering Services			
MS-1	Scheduled Energy Data provision (as a component of an Additional Reference Service (Metering))		
B	Interval, bi-monthly, manual	\$0.229 per day ²⁸	
C	Interval, monthly, manual	\$0.458 per day ²⁹	
D	Interval, bi-monthly, remote	\$0.122 per day ³⁰	
E	Interval, monthly, remote	\$0.122 per day ³¹	
F	Interval, daily, remote	\$1.060 per day	

MS-20 One-off manual interval data

No.	Meter Service Description	Service Standard (Business Days)		KPI
		Metropolitan	Country	
MS – 20	One-off manual Interval Read	10/11	15/16	95%

ID	Service Description	Fee (\$ per unit unless otherwise stated)	
		Metro	Country
MS-20	One off manual Interval Read	17.66	44.91

MS-19 Non-scheduled special meter reading

No.	Service Description	Service Standard (Business Days unless otherwise stated)		KPI
		Metropolitan	Country	
MS – 19	Non-scheduled special Meter Reading	3	5	95%

ID	Service Description	Fee (\$ per unit unless otherwise stated)	
		Metro	Country
MS-19	Non-scheduled special Meter Reading		
A	Accumulation Meter (Manual)	9.87	32.16
B	Interval Meter (Manual)	13.66	40.91

The non-scheduled read service (MS-19(B)) and the one-off manual interval data service (MS-20) is fundamentally the same service; however there appears to be a difference in price (MS-20 has a higher charge). The difference between the two services appears to relate to WP treating an *interval meter* as an *accumulation meter*. Synergy has detailed this in the table below. However, it is important to note that the data recorded in the meter is *interval energy data*.

Special Read Service	Special Read data provision:	Data recorded in the meter:	Meter registered in the Registry as:	Normal (scheduled) data provision to the retailer:
MS-20	<i>Interval energy data</i>	<i>Interval energy data</i>	<i>Accumulation Meter</i>	Accumulation data
MS-19(B)			<i>Interval Meter</i>	Interval data

Synergy has also calculated the (combined) total charges for the provision of *energy data* in Attachment 2 to this submission. The information in Attachment 2 highlights a number of pricing inconsistencies. For example, materially different charges for the provision of the same energy data, through the same meter, using the same technology.

Annual Metering Charges	M1 Reference Service Manual Accumulation Bi-Monthly	M3 Reference Service Manual Interval Bi-Monthly	M5 Reference Service Remote Interval Bi-Monthly
Residential customer (RT1)	\$29.70 \$4.95/read	\$113.29 \$18.88/read	\$74.23 \$12.37/read
Small Business customer (RT2)	\$36.33 \$6.06/read	\$119.92 \$19.99/read	\$80.86 \$13.48/read

To understand the basis of some the additional metering charges¹⁵ Synergy discussed the matter with WP. Based on these discussions Synergy understands:

- The additional metering charges in the MSLA, for the provision of remote *energy data*, are based exclusively on the cost of providing the data through cellular communications (not radio mesh).
- However, the cost of providing remote *energy data* through radio mesh communications is generally cheaper than through cellular communications (but subject to topography and radio mesh coverage). This cheaper cost is not reflected in the MSLA charges because, where remote *energy data* is provided through radio mesh communications, the current MSLA drafting indicates *users* will be required to pay the more expensive cellular charge in the MSLA.
- The majority of the meters installed on the network since February 2019 have been installed with a radio mesh NIC¹⁶. Approximately 20% of these meters are expected to be remotely enabled by July 2020. This percentage will progressively increase as the radio mesh coverage increases as part of WP's "AMI" roll-out plan. Cellular communications will still be used in some areas where radio mesh is not currently available or it is not feasible to deploy radio mesh.

In the event cellular charges apply to radio mesh remote *metering services* Synergy considers this pricing approach is not consistent with clause 6.6(1)(e) of the Metering Code because WP has not sought to achieve the lowest sustainable costs of providing the remote energy data *metering service*. If the drafting in the MSLA is not modified to address Synergy's concern *users* will pay a more expensive charge (that is, the charge for cellular communications) for data provided through a less expensive means (that is, via radio mesh communications).

¹⁵ For example, why the additional charges for proposed services M-5 and M-6 are the same.

¹⁶ Network interface card that will form part of the radio mesh *communications link*.

In Synergy's view, the Metering Code requires the following:

- if remote *energy data* is provided through cellular communications, then it must be provided to *users* at the lowest sustainable cost for that service; and
- if remote *energy data* is provided through radio mesh communications, then it must be provided to *users* at the lowest sustainable cost for that service.

If this is not reflected in the MSLA Synergy considers the ERA cannot approve the MSLA in its current form because it does not comply with clause 6.6(1)(e) of the Metering Code (clause 6.14, Metering Code) as the MSLA would be inconsistent with:

- the Metering Code objective in clause 2.1(1)(b) because it does not promote access to and confidence in data of parties to commercial electricity transactions;
- the matters the ERA is required to have regard to under section 26(1) of the ERA Act when approving the MSLA, including the long-term interests of consumers in relation to the price of goods and services (section 26(1)(b)), the need to promote competitive and fair market conduct (section 26(1)(e)) and the need to prevent abuse of monopoly or market power (section 26(1)(f)).

Further, Synergy considers it would be more efficient for the radio mesh charges to be included in the MSLA now instead of subjecting the MSLA to another public consultation process in July 2020, when the radio mesh services are scheduled to be available for use.

Other issues

Synergy has also in its MSLA submission No.2 raised concerns that need to be addressed in relation to service standards, charges and data accuracy for billing purposes.

In addition, Synergy notes that data accuracy is a metrology issue and should be regulated under the *metrology procedure*. Synergy requests the ERA to confirm that the MSLA is consistent with the *metrology procedure* and Metering Code clauses 1.5(2) and 3.1. Clauses 1.5(2) and 3.1 of the Metering Code require:

1.5(2) "To the extent that this *Code* and the *National Measurement Act* are inconsistent, this *Code* does not operate to the extent of the inconsistency."

3.1 "A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act."

Synergy notes the June 2019 MSLA no longer provides a service for customers to read their meters and provide the readings to WP (Refer to Synergy's MSLA submission No.2 in relation to the MDP-5 and MDP-15 service). Synergy considers it is important that the customer self-read service continues to be provided to:

1. support legacy customers who wish to read their own meters;
2. deal with situations where customers have access concerns but do not wish to pay the upfront costs for a new meter, remote communications link and reconfiguration.
3. support and facilitate clause 4.6(1)(b) of the Code of Conduct and clause 6.6(1)(a)(i) of Metering Code (and thereby the Metering Code objective in clause 2.1(c)), which retailers to bill customers based on the customer's read of their meter (subject to WP's consent).

WP however, has proposed the following arrangement under service MS-1:

“....Western Power, acting as a Reasonable and Prudent Person, may assign a Meter to be a Customer Self-Read Meter, where a Metering Point is geographically remote; where site access to the Meter is subject to restriction; or at the request of a Customer or User...”

Synergy considers that this service should be provided in the MSLA as a separate service to meet the requirements of clause 4.6(1)(b) of the Code of Conduct (that is, allowing a retailer to base a customer's bill on the customer's reading of the meter, provided that WP has expressly or impliedly consented to the customer reading the meter) and clause 6.6(1)(a)(i) of the Metering Code (and thereby the Metering Code objective in clause 2.1(c)). Consequently, the applicable service descriptions and standards for a customer self-read meter service must also be included in the MSLA. If the service is added as a separate service which a *user* can request (on behalf of a customer), Synergy considers this to be an acceptable outcome.

Other matters raised in Synergy's MSLA submission No.2 still need to be addressed (refer below).

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MDP-1 Scheduled Bi-Monthly Meter Reading (Accumulation Data)
- MDP-2 Scheduled Manual Interval Meter Reading (Interval Data)
- MDP-3 and MDP-4 Scheduled Remote Meter Reading - AMI Meter (Interval Data)
- MDP- 5 Scheduled Customer Meter Reading - (Accumulation Data)
- MDP – 15 (New) Customer / User Self Read Meter Data Validation,

at pages 110-121.

Comments on the various proposed Metering Services

MS-2 Meter installation and energisation

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Standard Metering Service		Meter Provision Service	
No.	MS-2		MP-1	
Description	Meter installation and energisation		Meter installation and energisation	
KPI	Met: 1/2/A (20)	99%	Met: 1/2/A (20)	99%
Business Days	Cty: 5/6/A (20)		Cty: 5/6/A (20)	
Fees	Included in a Reference Tariff under the ENAC (in the <i>price list</i>)			

As noted at page 21 above, Synergy understood, from WP's January 2018 MSLA proposal and WP's AMI public forums, that the new and replacement meters¹⁷ (provided under proposed services MS-2 and MS-6 (as to which see at pages 29 – 30 , below)) will be installed with a *communications link* and *users* and customers would not need to pay an additional charge to install a *communications link*.

However, the proposed service description of MS-2 in the June 2019 MSLA provides for the installation of a meter (an *accumulation meter* or an *interval meter*), but not a *communications link*.

Clause 3.16(2) of the Metering Code requires *Type 1 – Type 4 metering installations* to have a *communications link*.

¹⁷ Funded under AA4.

A significant number of business customers will require a *Type 4* meter installation. Currently under the MSLA a *communications link* is provided for *Type 1-4* meters at no additional charge. Therefore, this service MS-2 needs to make it clear:

1. whether a *communications link* will be provided for *Type 1 - Type 4 metering installations* at no additional charge; and
2. whether residential and small business customers will be required to pay an additional charge for the *communication link* if remote data services are required. As noted above, it is Synergy's understanding that residential customers, in relation to new and replacement meters, would not need to pay an additional charge for a *communications link*.

Synergy understands it is WP's intention that *Type 1-4* meter exchanges will include a *communications link* at no additional charge to the *user* (and customer). If this intention is reflected in the MSLA, Synergy considers this to be an acceptable outcome.

Finally, Synergy notes that the eligibility criteria for the MS-2 service requires:

"...A valid notice from the Customer's Electrical Contractor, confirming that the Metering Point is ready for a Meter to be installed and Energised..."

What a "valid notice" is needs to be clarified. It is not clear to Synergy what constitutes a "valid notice". Retailers will need to advise customers what type of notice is required by WP. If this is a notice that must be provided under energy safety regulations then the type of notice and regulation needs to be specified in the MSLA.

It is also important to clarify what a "valid notice" is so it is clear how a customer complaint under the Code of Conduct should be dealt with if a customer is not connected within the regulated time frames.

The other matters raised in Synergy's MSLA submission No.2 (but excluding those comments related to fees) still need to be addressed.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- Meter installation and energisation, pages 88–94.

MS-3 Standing data provision

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Accessory Metering Service		Meter Data Provision	
No.	MS-3		MDP-7	
Description	Standing Data Provision		Standing Data Provision	
KPI	Met: 2	99%	Met: 2	99%
Business Days	Cty: 2		Cty: 2	
Fees	Included in a Reference Tariff under the ENAC (in the <i>price list</i>)			

WP proposes this service will only be provided in respect of a request made under the Transfer Code.

However, provision of *standing data* under the Transfer Code is not the only circumstance in which *standing data* must be provided. *Standing data* is also provided under the Metering Code. For example, a *user* may request *standing data* under clauses 5.13 and 5.14 of the Metering Code, and WP must provide that *standing data* within the timeframes specified in the Metering Code.

Synergy requests the second sentence in the service description is amended to read as follows (amendment in underline):

"This Metering Service may be requested by the User in accordance with the Code, Customer Transfer Code and Code of Conduct."

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MDP-6 Standing Data Provision, pages 123–124.

MS-4 Historical energy data provisions

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Accessory Metering Service		Meter Data Provision	
No.	MS-4		MDP-8	
Description	Historical Energy Data Provision		Historical Energy Data Provision	
KPI	Met: 2	99%	Met: 2	99%
Business Days	Cty: 2		Cty: 2	
Fees	Included in a Reference Tariff under the ENAC (in the <i>price list</i>)			

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MDP-7 Historical Interval Energy Data Provision, pages 124–127.

MS-5 Meter installation repair

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Accessory Metering Service		Meter Provision Service	
No.	MS-5		MP-2	
Description	Meter Installation Repair		Meter Installation Repair	
KPI	Met: 10/11	95%	Met: 10/11	95%
Business Days	Cty: 15/16		Cty: 15/16	
Fees	Included in a Reference Tariff under the ENAC (in the <i>price list</i>)			

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MP-2 Meter Installation Repair, pages 94-97.

MS-6 Meter upgrade and replacement

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Accessory Metering Service		Meter Provision Service	
No.	MS-6		MP-3	
Description	Meter upgrade/replace (not User requested)		Meter upgrade	
KPI	In accordance with Code		In accordance with Code	
Business Days				
Fees	Included in a Reference Tariff under the ENAC (in the <i>price list</i>)			

As noted at page 21 above, Synergy understood from WP's January 2018 MSLA proposal and WP's AMI public forums, that the new and replacement meters¹⁸ (under MS-2 and MS-6) will be installed with a *communications link* and *users* and customers would not need to pay an additional charge to install a *communications link*.

However, the proposed service description for service MS-6 specifies that the meter replacement or upgrade will be done in accordance with the minimum requirements of the Metering Code. That is, the description does not specify that the meter replacement or upgrade will include a *communications link*.

Synergy requests this matter be clarified.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MP-3 Meter Upgrade, page 97.

MS-7 De-energise (manual)

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Extended Metering Service		Ancillary Service Provision; Meter Data Provision	
No.	MS-7		ASP-1; MDP-12	
Description	De-energise (manual)		De-energise (Non-AMI Meter); De-energise (AMI Meter)	
KPI Business Days	Met: 3/4 Cty: 5/6	95%	Met: 3/4 Cty: 5/6	95%
Fees	Met: \$53.19 Low Voltage Cty: \$116.61 Low Voltage High voltage Met/Cty - POA		Met: \$53.19 Low Voltage Cty: \$116.61 Low Voltage High voltage Met/Cty - POA	

In its AA4 submission on *reference services*¹⁹ and in its MSLA submission No.2, Synergy detailed why energisation and de-energisation services are conveyance services (as opposed to extended metering services). The ERA's AA4 final decision required remotely actioned energisation and de-energisation services to be classified as *reference services* under the ENAC. Synergy considers, for those same reasons, that manually actioned energisation and de-energisation services should be classified as *reference services* under the ENAC. This means that the fees for those services should be recovered as a part of the *reference tariffs* under the ENAC (that is, in the *price list*). As noted above at page 8, Synergy considers this matter could be addressed as part of the 2020/2021 changes to the *price list*.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- ASP-1, MDP-13 De-energise (manually and remotely actioned), pages 76-82.
- MSLA Coverage, pages 13-27.

MS-8 Re-energise (manual)

	Current MSLA Proposal	January 2018 MSLA proposal
Category	Extended Metering Service	Ancillary Service Provision; Meter Data Provision

¹⁸ Funded under AA4.

¹⁹ See, *AA4 submission to the Economic Regulation Authority No: 4 – Synergy reference services request* (dated 11 December 2017).

No.	MS-8		ASP-2; MDP 13	
Description	Re-energise (Manual)		Re-energise (Non-AMI Meter); Re-energise (AMI Meter)	
KPI Business Days	<u>Standard</u> Met: 1/2 Cty: 5/6	Standard: 99%	<u>Standard</u> Met: 1/2 Cty: 5/6	Standard: 99%
	<u>Urgent</u> Met: 3 hours Cty: 24 hours	Urgent: 99%	<u>Urgent</u> Met: 3 hours Cty: 24 hours	Urgent: 99%
Fees	<u>Standard Low Voltage</u> Met: \$53.19 Low Voltage Cty: \$116.61 Low Voltage <u>Urgent Low Voltage</u> Met: \$147.83 Low Voltage Cty: \$215.68 Low Voltage High voltage Met/Cty - POA		<u>Standard Low Voltage</u> Met: \$53.19 Low Voltage Cty: \$116.61 Low Voltage <u>Urgent Low Voltage</u> Met: \$147.83 Low Voltage Cty: \$215.68 Low Voltage High voltage Met/Cty - POA	

Synergy repeats its comments immediately above (in respect of proposed service MS-7), here.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- ASP-2, MDP-14 Re-energise (manually and remotely actioned), pages 82-85.
- MSLA Coverage, pages 13-27.

MS-9 Meter exchange

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Extended Metering Service		Meter Provision Service	
No.	MS-9		MP-4	
Description	Meter Exchange		Meter Exchange	
KPI Business Days	Met: 10/11 Cty: 15/16	95%	Met: 10/11 Cty: 15/16	95%
Fees	<u>Metro</u> 1 Phase: \$64.55 3 Phase: \$64.55 CT: \$64.55 <u>Country</u> 1 Phase: \$137.05 3 Phase: \$137.05 CT: \$137.05		<u>Metro</u> 1 Phase: \$64.55 3 Phase: \$64.55 CT: \$64.55 <u>Country</u> 1 Phase: \$137.05 3 Phase: \$137.05 CT: \$137.05	

It is important to note WP:

1. operates a "cellular communications link"; and
2. operates a "radio frequency communications link"; and

3. is currently expanding²⁰ its “radio frequency communications link”²¹.

Notwithstanding the treatment of the radio mesh capex under the ENAC, clause 6.6(1)(e) of the Metering Code requires metering service opex (charged to customers) to not exceed the costs that would be incurred by a *network operator* acting in good faith and in accordance with *good electricity industry practice*, seeking to achieve the lowest sustainable cost of providing the relevant *metering services*.

Based on Synergy’s recent discussions with WP and WP’s AMI public forums Synergy understood WP would be installing new meters with a radio mesh *communication links* which self-activates when the radio mesh back-bone is in place.

This has been WP’s consistent public message since the commencement of the MSLA review in October 2017.

Synergy also considers this is a reasonable and efficient approach because customers do not have to pay for an additional site visit to just to install a *communications link*.

The June 2019 MSLA proposes:

1. WP will install a meter that will provide manually read *energy data*.
2. If a *user* requires remotely read *energy data* (or services) then the *user* must also request a *communications link* installation service (MS-11).
3. WP will then visit the site and charge the *user* and customer to install the *communications link* (in accordance with MS-11).

Therefore, it appears under the MSLA *users* can be charged an additional fee when it is not necessary to visit the site because the meter already contains the *communications link*. In this event Synergy does not consider this reasonable.

Pursuant to clause 6.6(1)(e) of the Metering Code, WP must seek to achieve the lowest sustainable costs of providing the relevant *metering service*.

Therefore, Synergy requests the ERA to ensure:

1. The MSLA does not permit the charging for a communications installation if the meter already contains a *communications link*. This would otherwise be inconsistent with clause 6.6(1)(e) of the Metering Code and the matters the ERA is required to have regard to when reviewing and approving the MSLA in sections 26(1)(a), 26(1)(b), 26(1)(e) and 26(1)(f) of the ERA Act.
2. The *mandatory link criteria*²² is updated to include a provision that customers are not required to pay for the installation of a *communications link* if the meter already contains a *communications link*.
3. The MSLA contains a definition for the terms “Radio frequency communications link” and “Cellular communications link” (in particular, where does it physically start and where does it end)²³.

²⁰ As proposed under the AA4 and the initial revisions to the MSLA.

²¹ WP has previously referred to this as “radio mesh”.

²² The *mandatory link criteria* already specifies circumstances where customers do not need to pay for a *communications link* – see at section 4.3.2 of the *mandatory link criteria*.

²³ The Metering Code provides for two configurations of the *communication link* (depending on the location of the *data logger* in relation to the *device*) and contemplates it includes the communications chip installed in the meter and the back-end computers.

Synergy also requests the ERA to ensure that proposed service MS-3 (Standing data provision) specifies that WP must notify *users* whether the meter contains a *communications link* (as required by the current Build Pack)²⁴. Synergy requires this amendment to proposed service MS-3 because up to date and accurate *standing data* is key to retailers (and customers) knowing what has been installed at a connection point (including informing retailers of the configuration of meters and *communications link* at a site). However, Synergy understands WP, contrary to the Build Pack, does not provide this *standing data* consistently to retailers. In addition, Synergy is concerned that future updates to the Build Pack may seek to remove this information from *standing data*.

The other matters raised in Synergy's MSLA submission No.2 still need to be addressed.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MP-4 Meter Exchange, pages 97-99.

MS-10 Extended metering service

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Extended Metering Service		Meter Provision Service	
No.	MS-10		MP-5	
Description	Meter Investigation		Meter Investigation	
KPI Business Days	Met: 10/11 Cty: 15/16	95%	Met: 10/11 Cty: 15/16	95%
Fees	Met: \$178.01 Cty: \$257.46		Met: \$178.01257.46	

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MP-5 Meter Investigation, pages 100-103.

MS-11 Communication link installation

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Extended Metering Service		Meter Provision Service	
No.	MS-11		MP-6	
Description	Communication Link Installation		Communications Installation	
KPI Business Days	Met: 10/11 Cty: 15/16	95%	Met: 10/11 Cty: 15/16	95%
Fees	<u>Metro</u> Radio comms: \$64.55 Cellular comms: \$324.34 <u>Country</u> Radio comms: \$137.05 Cellular comms: \$396.84		<u>Metro</u> Comms: \$64.55 <u>Country</u> Comms: \$137.05	

²⁴ See clause 4.3(3) of the Metering Code – the *communications rules* may remove, modify or add to any requirement in clause 4.3(1) for the *standing data*.

As discussed above (see at page 21) Synergy understands, for new and replacement meters²⁵, WP will be installing the meters with *communication links*. The meter and *communications link* will automatically activate (without the need for a site visit) when WP's communication back-bone commences to become operational in July 2020.

Synergy considers²⁶ if a *communications link* is already installed then customers should only have to pay a modest (true cost reflective) administration fee for a back-end activation (or reconfiguration). Similarly, Synergy considers when customers do not require remotely read *energy data* or do not wish to have a *communications link* installed at their home then they should only have to pay a modest (true cost reflective) administration fee.

Finally, Synergy notes that in its January 2018 MSLA, WP required a *user* to request this service through a “**Reconfigure Service Order** in accordance with the Communication Rules”.

However, the June 2019 MSLA indicates that the compliant transaction under the *communication rules* and Build Pack is a **Miscellaneous Service Order**. This change in the Service Order highlights Synergy's concern in relation to regulatory consistency and compliance with the Build Pack – the Build Pack rules keep changing and this negatively impacts *standing data* integrity and hinders access to services for customers.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MP-6 Communications Installation, pages 103-106.

MS-12 Communication link deactivation

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Extended Metering Service			
No.	MS-12		Not provided previously to retailers	
Description	Communication Link Deactivation			
KPI	Met: 10/11			
Business Days	Cty: 15/16			
Fees	<u>Metro</u> Comms: \$64.55			
	<u>Country</u> Comms: \$137.05			

The *mandatory link criteria* approved by the ERA regulates the installation of, and charges related to, the roll-out of *communications link* infrastructure – this is separate from a request for such services by a *user* (or customer).

Synergy understands, based on its discussions with WP, WP plans a mass roll out of meters (funded under AA4) with pre-installed *communication links*, including (and primarily) for residential premises. However, Synergy now understands WP is seeking recover its costs if a customer chooses not to have a *communications link* installed at their home.

This proposed service MS-12 appears to have been introduced to address this requirement. However, Synergy considers in this situation customers are unlikely to pay for the removal of a *communications link* they did not ask for.

²⁵ Funded under AA4.

²⁶ See further the discussion below in respect of proposed services MS-12 and MS-15.

As mentioned above in relation to proposed metering service MS-11, Synergy considers when customers do not require remotely read *energy data* or do not wish to have a *communications link* installed at their home then they should, at the most, only have to pay a modest (true cost reflective) administration fee for the *communications link* to be de-activated. For example, the *communications link* could be deactivated but not removed. Synergy considers where a deactivation can be implemented the customer should pay a fee that is substantially less than \$64.55 or \$137.05. Therefore, the MSLA should contain two fees, one for removal and one for deactivation, of the *communications link*. This makes sense given tenancy and property sale turnover²⁷.

Synergy envisages as a result of WP seeking to recover its costs of a customer not wanting a *communications link*, Synergy may be required to manage associated complaints under the Metering Code and the *mandatory link criteria* in relation to this service cost. Therefore, the cost of this service provision is important.

In addition, WP's approach to mass roll-out of *communications links* will require retailers to make corresponding amendments to their standard form contracts to recover the MS-12 charges in circumstances where customers did not request remote services and do not want the communications infrastructure at their premises.

Synergy requests the ERA to determine:

1. Whether it is permissible or reasonable for a customer to pay for the removal of a *communications link* even though it was installed without their request or permission (and does not relate to a service requested by the *user* (or customer)).
2. Whether WP's approach is consistent with the matters under section 26 of the ERA Act, in particular:
 - section 26(1)(a) – the need to promote regulatory outcomes that are in the public interest;
 - section 26(1)(b) – the long-term interests of consumers in relation to price;
 - section 26(1)(e) – the need to promote competitive and fair market conduct;
 - section 26(1)(f) – the need to prevent abuse of monopoly or market power.

Synergy does not consider that an approach which requires a customer to pay for the removal of infrastructure which the customer did not request, to be consistent with any of the above mentioned matters.

3. Whether WP's approach complies with the *mandatory link criteria* and whether the *mandatory link criteria* needs to be amended by the ERA to give retailers and customers the right to choose whether to opt-in or opt-out of *communication link* infrastructure installations (before the roll-out commences). Synergy considers this needs to occur for the long term interests of consumers. It is also consistent with the Metering Code objective in clause 2.1(1)(c) of the Metering Code.
4. Whether the charges customers will be required to pay are efficient and consistent with clause 6.6(1)(e) of the Metering Code.
5. Whether the service standards to deactivate the *communications link* infrastructure are reasonable and consistent with the Code of Conduct.

MS-13 Meter test (laboratory)

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Extended Metering Service		Meter Provision Service	
No.	MS-13		MP-7	
Description	Meter Test (Laboratory)		Meter Test (Laboratory)	
KPI	Met: 15/16	95%	Met: 15/16	95%

²⁷ The new customers moving in may require remote services.

Business Days	Cty: 20/21		Cty: 20/21	
Fees	<u>1 Phase</u> Met: \$453.01 Cty: \$559.73 <u>3 Phase</u> Met: \$563.43 Cty: \$681.19		<u>1 Phase</u> Met: \$453.01 Cty: \$559.73 <u>3 Phase</u> Met: \$563.43 Cty: \$681.19	

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MP-7 and MP-8 Meter Test, pages 106-107.

MS-14 Meter test (on-site)

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Extended Metering Service		Meter Provision Service	
No.	MS-14		MP-8	
Description	Meter Test (on-site)		Meter Test (on-site)	
KPI	Met: 10/11	95%	Met: 10/11	95%
Business Days	Cty: 15/16		Cty: 15/16	
Fees	<u>1 Phase</u> Met: \$340.31 Cty: \$435.99 <u>3 Phase</u> Met: \$465.43 Cty: \$572.15 <u>CT Meter</u> Met: \$549.97 Cty: \$662.22		<u>1 Phase</u> Met: \$340.31 Cty: \$435.99 <u>3 Phase</u> Met: \$465.43 Cty: \$572.15 <u>CT Meter</u> Met: \$549.97 Cty: \$662.22	

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MP-7 and MP-8 Meter Test, pages 106-107.

MS-15 Meter reconfiguration

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Extended Metering Service		Meter Provision Service; Meter Data Provision Service	
No.	MS-15		MP-9; MDP-11	
Description	Meter Reconfiguration		Meter Reconfiguration (Non-AMI Meter); Meter Reconfiguration (AMI Meter)	
KPI Business Days	Met: 10/11 Cty: 15/16	95%	MP-9 (non-AMI) Met: 10/11 Cty: 15/16 MDP-11 (AMI) Met: 5/6 Cty: 5/6	95% 98%
Fees	<u>Manual</u> Met: \$64.55 Cty: \$137.05 <u>Remote</u> Met: \$20.02 Cty: \$20.02		<u>MP-9 (non-AMI)</u> Met: \$64.55 Cty: \$137.05 <u>MDP-11 (AMI)</u> Met: \$20.02 Cty: \$20.02	

It is not clear what is meant by “data registers” and whether this service applies to data registers for both accumulation meters and for interval meters. It is also not clear when the service must be done remotely or manually. Therefore, Synergy requires the service to:

1. Provide a definition for “Data Registers” in context of the Metering Code and detail what reconfiguration is required in respect of the “Data Registers”.
2. Clarify whether it only applies to accumulation meters²⁸.
3. Explain when the service must be done manually and when it can be done remotely.

It appears from the way this service has been drafted that a customer must pay for a new meter, remote communications and a manual reconfiguration in order to get interval data (total cost being \$193.65). Synergy understands this is not WP's intent and therefore the MSLA needs to be corrected.

There is a significant increase in the service standard (number of days) to perform a remotely actioned meter reconfiguration (refer to the highlighted items above). In addition, the KPI for remote reconfigurations have reduced from 98% to 95%.

Synergy considers it is likely that the service standards for remote time frames under MS-15 have been inadvertently omitted. Synergy requires the ERA to determine the reasonable service standards for remote reconfigurations under MS-15.

The service has also been re-drafted to clarify that the reconfiguration service only relates to two **(Service Outcomes)**:

1. providing *energy data* - in relation to bi-directional flows (as required by clause 3.3C of the Metering Code); or

²⁸ The use of the word “time of use” suggests it applies to both accumulation and interval meters.

2. providing *energy data* - in relation to time of use (presumably time-of-use *accumulation energy data* or *interval energy data*).

The service description states – "Where a site visit is required to perform the Service, the "Manual" fee defined in Schedule 5 will apply." This service description suggests that a site visit is always required to perform a "manual" reconfiguration to provide interval data. Synergy, based on its previous experience, understands this is not the case – where a meter²⁹ is recording *interval energy data* but WP provides accumulated data then no site visit or remote reconfiguration is required. All that is required is a change to data provision in WP's system.

Synergy therefore, based on its previous experience, considers there are (in reality) three reconfiguration scenarios:

1. A site visit (reconfiguration) to deliver the Service Outcomes.
2. A remote (reconfiguration) to deliver the Service Outcomes. Site visit not required.
3. A back-end system (reconfiguration) to deliver the Service Outcomes. Site visit not required.

Synergy considers this service does not accurately reflect the reconfiguration scenarios to provide the Service Outcomes and should include reduced fees and service standards for the back-end system reconfiguration³⁰.

Therefore, as outlined in its MSLA submission No.2 Synergy requires the ERA to determine if the costs for service MS-15 are efficient and how WP has sought to achieve the lowest sustainable costs in accordance with clause 6.6(1)(e) of the Metering Code.

The matters raised in Synergy's MSLA submission No.2 also still need to be addressed.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MP-9 Manual Meter Reconfiguration, pages 107-108.
- MDP-12 Meter Reconfiguration, pages 133-135.

MS-16 Enablement of signal pulse output

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Extended Metering Service		Meter Provision Service	
No.	MS-16		MP-10	
Description	Enablement of Signal Pulse Outputs		Enablement of Signal Pule Outputs	
KPI	Met: 10/11	95%	Met: 10/11	95%
Business Days	Cty: 15/16		Cty: 15/16	
Fees	Met: \$307.50 Cty: \$397.67		Met: \$307.50 Cty: \$397.67	

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MP-10 Enablement of Signal Pulse Output, pages 108-109.

²⁹ The electronic meters that have been installed over the last few years can only record *interval energy data* even though the energy data is provided to retailers (for billing purposes) as *accumulated energy data*.

³⁰ Refer also to Synergy's comments at pages 9 – 11 above (under the heading "Roll out of new and replacement meters funded under AA4").

MS-17 Remove meter

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Extended Metering Service		Meter Provision Service	
No.	MS-17		MP-11	
Description	Remove Meter		Remove Meter	
KPI Business Days	Met: 10/11 Cty: 15/16	95%	Met: 10/11 Cty: 15/16	95%
Fees	Met: \$127.91 Cty: \$204.27		Met: \$127.91 Cty: \$204.27	

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MP-11 Remove a Redundant Meter, page 110.

MS-18 Verify meter data

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Extended Metering Service		Meter Data Provision Service	
No.	MS-18		MDP-9	
Description	Verify Meter Data		Verify Meter Data	
KPI Business Days	Met: 5 Cty: 5	99%	Met: 5 Cty: 5	99%
Fees	Met: \$6.51 Cty: \$6.51		Met: \$6.51 Cty: \$6.51	

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MDP-8 Verify Meter Data, pages 127-129.

MS-19 Non-scheduled special meter reading

	Current MSLA Proposal		January 2018 MSLA proposal	
Category	Extended Metering Service		Meter Data Provision Service	
No.	MS-19		MDP-10	
Description	Non-scheduled special meter reading		Non-scheduled special meter reading	
KPI	Met: 3	95%	MDP-10A Non-AMI	95%
Business Days	Cty: 5		Met: 3	
			Cty: 5	
			MDP-10B AMI	98%
			Met: 0/1	
			Cty: 0/1	
			MDP-10A Remote Interval	98%
			Met: 0/1	
			Cty: 0/1	
Fees	Accumulation Meter (Manual Read)		MDP-10A Non-AMI	
	Met: \$9.87		Met: \$9.96	
	Cty: \$32.16		Cty: \$32.46	
	Interval Meter (Manual Read)		MDP-10B AMI	
	Met: \$13.66		Met: \$0.60	
	Cty: \$40.91		Cty: \$0.60	
	Interval Meter (Remote Read)		MDP-10A Remote Interval	
	Met: \$0.60		Met: \$0.60	
	Cty: \$0.60		Cty: \$0.60	

This service is mainly used by small use customers who are moving in or out of premises.

Compared to the January 2018 MSLA, there is a reduction in the KPI for remote reads from 98% to 95% (refer to the highlighted items above). In addition, there is a significant increase in the service standard (number of days) to perform a remote meter read. The time to perform a remote meter read has gone up by 4-5 business days. These changes do not appear to be reasonable. Synergy considers the cost, accuracy, reliability and timeliness of remote readings should significantly higher than a manual read. Synergy understands this is one of the key benefits of a mass roll-out of AMI meters by WP.

In addition, Synergy considers the charge for manually reading an interval meter is excessively high (refer to the highlighted items above) – in the case of accumulation meters (for metropolitan customers), over 16 times the amount for an interval meter remote read; in the case of interval meters (for metropolitan customers), over 22 times the amount for an interval meter remote read. In addition, noting clause 6.6(1)(e) requires WP to seek to achieve the lowest sustainable cost, Synergy considers these charges do not reflect WP's actual efficient costs and is not aligned with Synergy's experience in relation to contracting for manual interval meter readings in 2016/2017.

The matters raised in Synergy's MSLA submission No.2 also still need to be addressed.

Please refer to the matters raised in Synergy's MSLA submission No.2:

- MDP-9, 10, 11 Non-Scheduled Special Meter Reading, pages 129-133.

Attachment 1 – Example layout for service descriptions

Category	Extended Metering Service
No.	MS-10
Service Description	Meter Investigation

This Metering Service is an Extended Metering Service.

This Metering Service may be requested by the User to:

- (a) audit a Metering Installation due to a User concern, or concern raised by a Customer, other than issues relating to the accuracy of a Meter; or
- (b) audit the Standing Data for a Metering Installation.

Where this Metering Service is requested, Western Power will investigate the concern raised by the requestor and subsequently report the outcome of this investigation to the User.

Where an outage or malfunction to a Metering Installation is confirmed, Western Power will complete a Metering Installation repair (MS-5), subject to the discretion noted in that Metering Service description to replace the Meter instead.

The Meter test Metering Services (MS-13 or MS-14) should be used to request a test or audit of the accuracy of a Metering Installation.

The verify Meter *Energy Data* Service (MS-18) should be used to request an audit of *Energy Data* for a Metering Installation.

Service Standards	Metro		Country	
Fees	\$178.01		\$257.46	
Service Time Frame (Business Days)	10 Before 3PM	11 After 3PM	15 Before 3PM	16 Before 3PM
Data accuracy	NA		NA	
KPI	95% of requests delivered within time frames			
Eligibility Criteria: <ul style="list-style-type: none">A Meter Investigation - Inspect Service Order in accordance with the Communication Rules				
Notes:				

Attachment 2 – Total annual charges for energy data provision MS-1– Synergy pricing issues and comments summary

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
RT1	A1 - Anytime Energy (Residential) Exit Service	M1 - Unidirectional, accumulation, bi-monthly, manual	8.137	0	\$0.00	\$29.70	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M3 - Unidirectional, interval, bi-monthly, manual	8.137	22.9	\$83.59	\$113.29	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M4 - Unidirectional, interval, monthly, manual	8.137	45.8	\$167.17	\$196.87	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M5 - Unidirectional, interval, bi-monthly, remote	8.137	12.2	\$44.53	\$74.23	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	8.137	12.2	\$44.53	\$74.23	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	8.137	106	\$386.90	\$416.60	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	8.137	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT2	A2 - Anytime Energy (Business) Exit Service	M1 - Unidirectional, accumulation, bi-monthly, manual	9.954	0	\$0.00	\$36.33	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M3 - Unidirectional, interval, bi-monthly, manual	9.954	22.9	\$83.59	\$119.92	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M4 - Unidirectional, interval, monthly, manual	9.954	45.8	\$167.17	\$203.50	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M5 - Unidirectional, interval, bi-monthly, remote	9.954	12.2	\$44.53	\$80.86	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	9.954	12.2	\$44.53	\$80.86	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	9.954	106	\$386.90	\$423.23	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	9.954	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT3	A3 - Time of Use Energy (Residential) Exit Service	M2 - Unidirectional, accumulation (TOU), bi-monthly, manual	9.44	0	\$0.00	\$34.46	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M3 - Unidirectional, interval, bi-monthly, manual	9.44	22.9	\$83.59	\$118.04	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M4 - Unidirectional, interval, monthly, manual	9.44	45.8	\$167.17	\$201.63	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M5 - Unidirectional, interval, bi-monthly, remote	9.44	12.2	\$44.53	\$78.99	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	9.44	12.2	\$44.53	\$78.99	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	9.44	106	\$386.90	\$421.36	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	9.44	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT4	A4 - Time of Use Energy (Business) Exit Service	M2 - Unidirectional, accumulation (TOU), bi-monthly, manual	29.102	0	\$0.00	\$106.22	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M3 - Unidirectional, interval, bi-monthly, manual	29.102	22.9	\$83.59	\$189.81	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M4 - Unidirectional, interval, monthly, manual	29.102	45.8	\$167.17	\$273.39	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M5 - Unidirectional, interval, bi-monthly, remote	29.102	12.2	\$44.53	\$150.75	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	29.102	12.2	\$44.53	\$150.75	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	29.102	106	\$386.90	\$493.12	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	29.102	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT5	A5 - High Voltage Metered Demand Exit Service	M5 - Unidirectional, interval, bi-monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	34.603	106	\$386.90	\$513.20	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
	C5 - High Voltage Metered Demand Bi-directional Service	M12 - Bidirectional, interval, bi-monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M14 - Bidirectional, interval, daily, remote	34.603	106	\$386.90	\$513.20	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
RT6	A6 - Low Voltage Metered Demand Exit Service	M3 - Unidirectional, interval, bi-monthly, manual	34.603	22.9	\$83.59	\$209.89	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M4 - Unidirectional, interval, monthly, manual	34.603	45.8	\$167.17	\$293.47	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M5 - Unidirectional, interval, bi-monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	34.603	106	\$386.90	\$513.20	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							charge seeks to achieve the lowest sustainable cost.
	C6 - Low Voltage Metered Demand Bi-directional service	M10 - Bidirectional, interval, bi-monthly, manual	34.603	22.9	\$83.59	\$209.89	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M11 - Bidirectional, interval, monthly, manual	34.603	45.8	\$167.17	\$293.47	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M12 - Bidirectional, interval, bi-monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M14 - Bidirectional, interval, daily, remote	34.603	106	\$386.90	\$513.20	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
RT7	A7 - High Voltage Contract Maximum Demand Exit Service	M5 - Unidirectional, interval, bi-monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	34.603	106	\$386.90	\$513.20	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
	C7 - High Voltage Contract Maximum Demand Bi-directional Service	M12 - Bidirectional, interval, bi-monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M14 - Bidirectional, interval, daily, remote	34.603	106	\$386.90	\$513.20	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							charge seeks to achieve the lowest sustainable cost.
RT8	A8 - Low Voltage Contract Maximum Demand Exit Service	M3 - Unidirectional, interval, bi-monthly, manual	34.603	22.9	\$83.59	\$209.89	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M4 - Unidirectional, interval, monthly, manual	34.603	45.8	\$167.17	\$293.47	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M5 - Unidirectional, interval, bi-monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	34.603	106	\$386.90	\$513.20	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
	C8 - Low Voltage Contract Maximum Demand Bi- directional service	M10 - Bidirectional, interval, bi-monthly, manual	34.603	22.9	\$83.59	\$209.89	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M11 - Bidirectional, interval, monthly, manual	34.603	45.8	\$167.17	\$293.47	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M12 - Bidirectional, interval, bi-monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M14 - Bidirectional, interval, daily, remote	34.603	106	\$386.90	\$513.20	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
RT9	A9 - Streetlight Exit Service	M15 - Unmetered supply, accumulation, bi-monthly, manual					Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							charge seeks to achieve the lowest sustainable cost.
RT10	A10 - Unmetered Supplies Exit Service	M15 - Unmetered supply, accumulation, bi-monthly, manual					Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
TRT1	A11 - Transmission Exit Service	M4 - Unidirectional, interval, monthly, manual	1011.758	45.8	\$167.17	\$3,860.09	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M6 - Unidirectional, interval, monthly, remote	1011.758	12.2	\$44.53	\$3,737.45	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	1011.758	106	\$386.90	\$4,079.82	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
RT11	B1 - Distribution Entry Service	M4 - Unidirectional, interval, monthly, manual	34.603	45.8	\$167.17	\$293.47	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							charge seeks to achieve the lowest sustainable cost.
		M6 - Unidirectional, interval, monthly, remote	34.603	12.2	\$44.53	\$170.83	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	34.603	106	\$386.90	\$513.20	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
TRT2	B2 - Transmission Entry Service	M6 - Unidirectional, interval, monthly, remote	1011.758	12.2	\$44.53	\$3,737.45	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	1011.758	106	\$386.90	\$4,079.82	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
RT23	B3 - Entry Service Facilitating a Distributed Generation or	No existing metering installations					Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
	Other Non-Network Solution						charge seeks to achieve the lowest sustainable cost.
RT13	C1 - Anytime Energy (Residential) Bi-directional Service	M8 - Bidirectional, accumulation, bi-monthly, manual	8.056	0	\$0.00	\$29.40	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M10 - Bidirectional, interval, bi-monthly, manual	8.056	22.9	\$83.59	\$112.99	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M11 - Bidirectional, interval, monthly, manual	8.056	45.8	\$167.17	\$196.57	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M12 - Bidirectional, interval, bi-monthly, remote	8.056	12.2	\$44.53	\$73.93	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	8.056	12.2	\$44.53	\$73.93	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M14 - Bidirectional, interval, daily, remote	8.056	106	\$386.90	\$416.30	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	8.056	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT14	C2 - Anytime Energy (Business) Bi-directional Service	M8 - Bidirectional, accumulation, bi-monthly, manual	13.098	0	\$0.00	\$47.81	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M10 - Bidirectional, interval, bi-monthly, manual	13.098	22.9	\$83.59	\$131.39	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M11 - Bidirectional, interval, monthly, manual	13.098	45.8	\$167.17	\$214.98	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							charge seeks to achieve the lowest sustainable cost.
		M12 - Bidirectional, interval, bi-monthly, remote	13.098	12.2	\$44.53	\$92.34	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	13.098	12.2	\$44.53	\$92.34	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M14 - Bidirectional, interval, daily, remote	13.098	106	\$386.90	\$434.71	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	13.098	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT15		M9 - Bidirectional, accumulation (TOU), bi-monthly, manual	8.156	0	\$0.00	\$29.77	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
	C3 - Time of Use (Residential) Bi- directional Service						Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M10 - Bidirectional, interval, bi-monthly, manual	8.156	22.9	\$83.59	\$113.35	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M11 - Bidirectional, interval, monthly, manual	8.156	45.8	\$167.17	\$196.94	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M12 - Bidirectional, interval, bi-monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M14 - Bidirectional, interval, daily, remote	8.156	106	\$386.90	\$416.67	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	8.156	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT16	C4 - Time of Use (Business) Bi-directional Service	M9 - Bidirectional, accumulation (TOU), bi-monthly, manual	33.837	0	\$0.00	\$123.51	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M10 - Bidirectional, interval, bi-monthly, manual	33.837	22.9	\$83.59	\$207.09	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M11 - Bidirectional, interval, monthly, manual	33.837	45.8	\$167.17	\$290.68	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M12 - Bidirectional, interval, bi-monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M14 - Bidirectional, interval, daily, remote	33.837	106	\$386.90	\$510.41	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	33.837	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT17	A12 - 3 Part Time of Use Energy	M2 - Unidirectional, accumulation (TOU), bi-monthly, manual	8.156	0	\$0.00	\$29.77	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
	(Residential) Exit Service						charge seeks to achieve the lowest sustainable cost.
		M3 - Unidirectional, interval, bi-monthly, manual	8.156	22.9	\$83.59	\$113.35	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M4 - Unidirectional, interval, monthly, manual	8.156	45.8	\$167.17	\$196.94	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M5 - Unidirectional, interval, bi-monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	8.156	106	\$386.90	\$416.67	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M16 - One off manual interval read	8.156	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
	C9 - 3 Part Time of Use Energy (Residential) Bi-directional Service	M9 - Bidirectional, accumulation (TOU), bi-monthly, manual	8.156	0	\$0.00	\$29.77	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M10 - Bidirectional, interval, bi-monthly, manual	8.156	22.9	\$83.59	\$113.35	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M11 - Bidirectional, interval, monthly, manual	8.156	45.8	\$167.17	\$196.94	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M12 - Bidirectional, interval, bi-monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M14 - Bidirectional, interval, daily, remote	8.156	106	\$386.90	\$416.67	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	8.156	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT18	A13 - 3 Part Time of Use Energy	M2 - Unidirectional, accumulation (TOU), bi-monthly, manual	33.837	0	\$0.00	\$123.51	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
	(Business) Exit Service						charge seeks to achieve the lowest sustainable cost.
		M3 - Unidirectional, interval, bi-monthly, manual	33.837	22.9	\$83.59	\$207.09	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M4 - Unidirectional, interval, monthly, manual	33.837	45.8	\$167.17	\$290.68	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M5 - Unidirectional, interval, bi-monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	33.837	106	\$386.90	\$510.41	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M16 - One off manual interval read	33.837	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
	C10 - 3 Part Time of Use Energy (Business) Bi-directional Service	M9 - Bidirectional, accumulation (TOU), bi-monthly, manual	33.837	0	\$0.00	\$123.51	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M10 - Bidirectional, interval, bi-monthly, manual	33.837	22.9	\$83.59	\$207.09	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M11 - Bidirectional, interval, monthly, manual	33.837	45.8	\$167.17	\$290.68	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M12 - Bidirectional, interval, bi-monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M14 - Bidirectional, interval, daily, remote	33.837	106	\$386.90	\$510.41	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	33.837	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT19	A14 - 3 Part Time of Use Demand	M2 - Unidirectional, accumulation (TOU), bi-monthly, manual	8.156	0	\$0.00	\$29.77	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
	(Residential) Exit Service						charge seeks to achieve the lowest sustainable cost.
		M3 - Unidirectional, interval, bi-monthly, manual	8.156	22.9	\$83.59	\$113.35	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M4 - Unidirectional, interval, monthly, manual	8.156	45.8	\$167.17	\$196.94	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M5 - Unidirectional, interval, bi-monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	8.156	106	\$386.90	\$416.67	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M16 - One off manual interval read	8.156	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
	C11 - 3 Part Time of Use Demand (Residential) Bi-directional Service	M9 - Bidirectional, accumulation (TOU), bi-monthly, manual	8.156	0	\$0.00	\$29.77	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M10 - Bidirectional, interval, bi-monthly, manual	8.156	22.9	\$83.59	\$113.35	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M11 - Bidirectional, interval, monthly, manual	8.156	45.8	\$167.17	\$196.94	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M12 - Bidirectional, interval, bi-monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M14 - Bidirectional, interval, daily, remote	8.156	106	\$386.90	\$416.67	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	8.156	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT20	A15 - 3 Part Time of Use Demand	M2 - Unidirectional, accumulation (TOU), bi-monthly, manual	33.837	0	\$0.00	\$123.51	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
	(Business) Exit Service						charge seeks to achieve the lowest sustainable cost.
		M3 - Unidirectional, interval, bi-monthly, manual	33.837	22.9	\$83.59	\$207.09	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M4 - Unidirectional, interval, monthly, manual	33.837	45.8	\$167.17	\$290.68	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M5 - Unidirectional, interval, bi-monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	33.837	106	\$386.90	\$510.41	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M16 - One off manual interval read	33.837	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
	C12 - 3 Part Time of Use Demand (Business) Bi-directional Service	M9 - Bidirectional, accumulation (TOU), bi-monthly, manual	33.837	0	\$0.00	\$123.51	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M10 - Bidirectional, interval, bi-monthly, manual	33.837	22.9	\$83.59	\$207.09	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M11 - Bidirectional, interval, monthly, manual	33.837	45.8	\$167.17	\$290.68	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
		M12 - Bidirectional, interval, bi-monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M14 - Bidirectional, interval, daily, remote	33.837	106	\$386.90	\$510.41	
		M16 - One off manual interval read	33.837	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT21	A16 - Multi Part Time of Use Energy (Residential) Exit Service	M2 - Unidirectional, accumulation (TOU), bi-monthly, manual	8.156	0	\$0.00	\$29.77	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M3 - Unidirectional, interval, bi-monthly, manual	8.156	22.9	\$83.59	\$113.35	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M4 - Unidirectional, interval, monthly, manual	8.156	45.8	\$167.17	\$196.94	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M5 - Unidirectional, interval, bi-monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	8.156	106	\$386.90	\$416.67	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	8.156	MS-20 (One-Off) Metro: \$17.66			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
				Cty: \$44.91			AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
	C13 - Multi Part Time of Use Energy (Residential) Bi- directional Service	M9 - Bidirectional, accumulation (TOU), bi-monthly, manual	8.156	0	\$0.00	\$29.77	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M10 - Bidirectional, interval, bi-monthly, manual	8.156	22.9	\$83.59	\$113.35	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M11 - Bidirectional, interval, monthly, manual	8.156	45.8	\$167.17	\$196.94	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M12 - Bidirectional, interval, bi-monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy considers the additional charge of 12.2 cents for M12 should be discounted relative to the M13 service.
		M13 - Bidirectional, interval, monthly, remote	8.156	12.2	\$44.53	\$74.30	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M14 - Bidirectional, interval, daily, remote	8.156	106	\$386.90	\$416.67	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	8.156	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.
RT22	A17 - Multi Part Time of Use Energy (Business) Exit Service	M2 - Unidirectional, accumulation (TOU), bi-monthly, manual	33.837	0	\$0.00	\$123.51	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M3 - Unidirectional, interval, bi-monthly, manual	33.837	22.9	\$83.59	\$207.09	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							charge seeks to achieve the lowest sustainable cost.
		M4 - Unidirectional, interval, monthly, manual	33.837	45.8	\$167.17	\$290.68	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M5 - Unidirectional, interval, bi-monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M6 - Unidirectional, interval, monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M7 - Unidirectional, interval, daily, remote	33.837	106	\$386.90	\$510.41	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	33.837	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20.

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							Synergy has also contracted for this type of service in 2016/17 for substantially less.
	C14 - Multi Part Time of Use Energy (Business) Bi- directional Service	M9 - Bidirectional, accumulation (TOU), bi-monthly, manual	33.837	0	\$0.00	\$123.51	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M10 - Bidirectional, interval, bi-monthly, manual	33.837	22.9	\$83.59	\$207.09	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M11 - Bidirectional, interval, monthly, manual	33.837	45.8	\$167.17	\$290.68	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M12 - Bidirectional, interval, bi-monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy considers the additional charge of 12.2 cents for M5 should be discounted relative to the M6 service.
		M13 - Bidirectional, interval, monthly, remote	33.837	12.2	\$44.53	\$168.04	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the

AA4 Reference tariff	Reference service	Reference Service (Metering)	AA4 Price List cents/meter /day	MSLA Additional Charge (cents/day)	MSLA Additional Charge (\$/annually)	Total annual cost (\$)	Pricing issues and comments
							charge seeks to achieve the lowest sustainable cost.
		M14 - Bidirectional, interval, daily, remote	33.837	106	\$386.90	\$510.41	Synergy seeks the ERA to review this charge consistent with 6.6(1)(e) of the Metering Code and satisfy itself the charge seeks to achieve the lowest sustainable cost.
		M16 - One off manual interval read	33.837	MS-20 (One-Off) Metro: \$17.66 Cty: \$44.91			This is a one-off service and not an ongoing scheduled meter read service. Therefore, it is not clear how the daily AA4 charge is meant to work with the one-off charge under MS-20. Synergy has also contracted for this type of service in 2016/17 for substantially less.