Respondent details

R1 - I am responding to the Energy Legislation Review Stage 2 Options Paper as a company, organisation or agency
Individual respondent details
Age
Name
Email address
Please re-enter your email address

Company respondent details
Name of company, organisation or agency
Vector Metering

Name of the best contact person from your company, organisation or agency. For example John Robinson

Topic 1 Purpose of state energy laws i.e Objectives of the Acts
Q1.1 Of the Options considered for this Topic, which one do you prefer?
I have no interest in this topic
Q1.2 Why?
Q1.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 2 Energy efficiency and demand management
Q2.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q2.2 Why?
Q2.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 3 Interaction with applied national laws
Q3.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q3.2 Why?
Q3.3 Thinking of your preferred Option, would you like to suggest any improvements?
Topic 4 Licensing
Q4.1.1 For generation, of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q4.1.2 Why?
Q4.1.3 For generation, thinking of your preferred Option, would you like to suggest any improvements?

Q4.2.1 For network businesses, of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q4.2.2 Why?
Q4.2.3 For network businesses, thinking of your preferred Option, would you like to suggest any improvements?

Q4.3 FEEDBACK WANTED on electric vehicle charging stations and licensing. Stakeholder feedback is sought on the benefits, disadvantages and risks of licensing electric vehicle charging stations under the Electricity Act, or via the exemptions framework.
Blank (I have no interest in providing feedback)
Q4.4 Please provide your feedback below

Topic 5 Powers of entry and resumption
Q5.1 Of the Options considered for this Topic, which one do you prefer?
Option 2
Q5.2 Why?
Vector particularly supports two proposals under Option 2 that are of significant relevance to metering providers: 1) access to power industry locks, and 2) the extension of powers of entry and resumption to metering coordinators/providers. As indicated in the Options Paper (page 93), “where metering coordinators do not have direct rights, they must rely on rights conferred by the retailer who has appointed them...to provide access to other parties”. We agree that “while this is an effective work-around and reflects the customer’s direct relationships with retailers (rather than metering providers), it may add unnecessary cost” (page 93). Another work-around is for metering providers to enter into contract with distributors for access to the meter, but this would similarly impose costs on the contracting parties, and eventually consumers. We further agree that “at a minimum, if services are provided on any scale, rights to entry to read a meter, maintain or repair works particularly where they present a safety hazard, and privileges such as assumed consent of future owners / occupiers of a place to the building of works and retention of property of works appear necessary to minimise risks and cost to existing and future owners” (page 94). In the case of power industry locks, the coordination required between the distributor, retailer, and metering coordinator/provider imposes additional costs on these parties and their ‘shared customers’. We therefore support the proposal under Option 2 that would “require distribution entities to provide access to power industry locks to retailers or metering coordinators” (page 98). We agree that “this would reduce delays associated with retailers or metering coordinators obtaining access to power industry locks for the purposes of meter reading and meter works” (page 98). We also agree that this is “expected to... reduce costs for both distributors and retailers by clarifying obligations in relation to shared customers” (page 98). We agree that “as retailers already have a right to access meters for the purpose of meter reading, customers are not anticipated to be disadvantaged” (page 98) by the above proposal. We further agree that the proposed amendment “would ensure that the purpose for which power industry locks are installed (permitting access to the meter reader to avoid bill estimations etc., but otherwise keeping access to a meter secure) continues to operate
effectively, following the Power of Choice reforms“ (page 98). We support the approach under Option 2 in relation to the above issues that would enable industry to “develop principles tailored to the types of access required and works they undertake, backed by a safety net of potential intervention in the event the principles are not being adhered to, or are inadequate to address sensitive…access matters” (page 98). More broadly, we support the proposal that the rules within the Electricity Act which give retailers meter access be expanded to metering coordinators, “noting the responsibility of metering coordinators under the National Electricity Rules to be responsible for the security of and access to a meter” (page 99). We agree that this “is not anticipated to have any practical impact on customers (metering coordinators are already given rights via delegation from retailers), other than improving transparency around who rights of access are conferred on” (page 100).

Q5.3 Thinking of your preferred Option, would you like to suggest any improvements?

Q5.4 FEEDBACK WANTED Electric vehicles and powers of entry. Stakeholder feedback is sought on the benefits, disadvantages and risks of classifying electric vehicles connected at premises as part of an electrical installation for the purposes of entry.

Blank (I have no interest in providing feedback)

Q5.4 Please provide your feedback below

Topic 6 Technical requirements

Q6.1 Of the Options considered for this Topic, which one do you prefer?
Option 3

Q6.2 Why?
Vector fully supports the proposal to establish a new standards and codes framework to be administered by the Queensland Competition Authority and supported by an appropriate technical panel. We recommend that care is taken to clearly define the boundaries and applicability of such codes and standards to avoid the confusion related to regulatory authority that sometimes occurs in other jurisdictions. Vector’s submission on this Review’s Issues Paper (that was released in May 2018) proposed that metering providers be given the power to isolate supply in order to carry out their responsibilities. We therefore welcome the Review’s observation that “this appears to be a necessary amendment to support the changeover in responsibility” made under the Power of Choice reforms that moved responsibility for metering from distribution entities to metering providers (page 117). We support the proposal under Option 3 (for electricity) to allow meter providers to isolate supply when working on meters. We agree that “this is a safety measure that recognises distributors are no longer exclusively responsible for metering services, following the December 2017 Power of Choice reforms” (page 126). We further agree that this proposal “is not expected to impact on customers or distributors but will help ensure a safe operating environment for metering entities” (page 126). We are happy to discuss our views with the relevant Queensland Government officials during the further development of the above proposals.

Q6.3 Thinking of your preferred Option, would you like to suggest any improvements?

We also support the removal of current obligations requiring a customer to pay for costs related to a new meter installation as this is clearly against the principles of competition introduced by the Power of Choice reforms; however, the rational for removing a requirement for the customer to provide the housing for a meter installation is unclear. We believe these are unrelated. Customer obligations to provide infrastructure to host a utility meter is a customer obligation in other jurisdictions under local codes and, to our knowledge, is not specified under existing national rules.

Q6.4 FEEDBACK WANTED Electric vehicles and network connection agreements. Stakeholder feedback is sought on the advantages, disadvantages and risks of requiring electric vehicle owners to
seek network approval under the Electricity Act to install an electric vehicle charger which is configured to export, or to otherwise inform the network of their purchase.
Blank - I have no interest in providing feedback
Q6.4 Please provide your feedback below

Q6.5 FEEDBACK WANTED Electric vehicles and definition of electrical installation. Stakeholder feedback is sought on the advantages, disadvantages and risks of extending the definition of electrical installation to electric vehicles.
Blank - I have no interest in providing feedback
Q6.5 Please provide your feedback below

Q6.6 FEEDBACK WANTED Excluded customers. Stakeholder feedback is sought on the whether any adjustment may need to be made to either the National Energy Retail Law (Queensland) or the definition of excluded customer in the Electricity Act to account for new technology (e.g. solar and batteries) or new stand-alone power systems (noting the Australian Energy Market Commission is also considering this issue).
Blank - I have no interest in providing feedback
Q6.6 Please provide your feedback below

Q6.7 FEEDBACK WANTED Electric vehicles charging stations and technical regulation. Stakeholder feedback is sought on whether the framework for technical standards under the Electricity Act should apply to electric vehicle charging stations.
Blank (I have no interest in providing feedback)
Q6.7 Please provide your feedback below

Topic 7 Price control
Q7.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q7.2 Why?
Q7.3 Thinking of your preferred Option, would you like to suggest any improvements?

Q7.4 FEEDBACK WANTED Electric vehicles and price control. Stakeholder views are sought on the advantages, disadvantages and risks of extending price protections to operators of commercial electric vehicle charging stations.
Blank - I have no interest in providing feedback
Q7.4 Please provide your feedback below

Q7.5 FEEDBACK WANTED Retail products, services and innovation. Stakeholder views are sought on the value of building greater flexibility into retail products and services for regional customers to address new technologies, and how this could be achieved.
Blank - I have no interest in providing feedback
Q7.5 Please provide your feedback below
Q7.6 FEEDBACK WANTED Electric vehicles and regional feed-in tariff. Stakeholder views are sought on the advantages, disadvantages and risks of facilitating feed-in tariff payments in regional areas for exports from electric vehicles.
Blank - I have no interest in providing feedback
Q7.6 Please provide your feedback below

Topic 8 Dispute resolution
Topic 8.1 EWOQ: Embedded network customer fee options
Q8.1 FEEDBACK WANTED Stakeholder views are sought on embedded network customer fee options.
Blank - I have no interest in providing feedback
Q8.1.1 What type of energy disputes are likely to arise between exempt sellers and their customers?
Q8.1.2 What dispute resolution mechanisms do embedded network customers currently use in order to have their energy disputes settled? Are customers aware of and successfully using existing mechanisms? Are there any issues with the current mechanisms?
Q8.1.3 Are there any stakeholder groups that the department should consider, and consult with, when assessing potential options for embedded network customers?
Q8.1.4 Is the predicted number of complaints reasonable based on the information available?
Q8.1.5 Do you agree with the proposal for all residential exempt sellers to be automatically deemed to be Energy and Water Ombudsman scheme participants?
Q8.1.6 Do you agree with the proposal NOT to require exempt sellers to pay an annual participation (membership) fee? If not, why.
Q8.1.7 Do you agree that the proposed fees for exempt sellers under Option 3 are fair and reasonable, and proportionate to the level of impact the issue or complaint may have on the exempt seller customer? If not please explain why.
Q8.1.8 Are there any other user-pays fee options the department should consider?
Q8.1.9 Do you see any issues with delaying the implementation of the user-pays fee scheme for at least 12 months in order to gather data to increase awareness and understanding of the Energy and Water Ombudsman services before fees are payable?

Topic 8.2 EWOQ: general
Q8.2.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q8.2.2 Why?
Q8.2.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 8.3 Dispute resolution - Regulator
Q8.3.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q8.3.2 Why?
Q8.3.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 9 Customer protections
Q9.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q9.2 Why?
Q9.3 Thinking of your preferred Option, would you like to suggest any improvements?
Q9.4 FEEDBACK WANTED Electric vehicles. Stakeholder feedback is sought on the advantages, disadvantages and risks of including electric vehicle customers within the definition of a customer.
Blank - I have no interest in providing feedback
Q9.4 Please provide your feedback below

Topic 10 Emergency provisions
Q10.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q10.2 Why?
Q10.3 Thinking of your preferred Option, would you like to suggest any improvements?

Q10.4 FEEDBACK WANTED Operator of last resort (OoLR) and stand-alone power systems. Stakeholder feedback is sought on the adequacy of ss. 130 and 131 to manage potential issues relating to third party stand-alone power systems, in light of Australian Energy Market Commission stand-alone power systems work.
Q10.4 Please provide your feedback below

Q10.5 FEEDBACK WANTED Emergency powers. What should be the threshold for an emergency supply declaration? What should be the scope of Ministerial direction powers taking account of Ministerial direction powers in other NEM jurisdiction? Would there be an ongoing need for a restriction regulation?
Blank - I have no interest in providing feedback
Q10.5 Please provide your feedback below

Topic 11 Offences and penalties
Q11.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q11.2 Why?
Q11.3 Thinking of your preferred Option, would you like to suggest any improvements?