

Submitted via Email: regulatorysandbox@aer.gov.au

Dear AER team,

Endeavour Energy's Waiver Application

PLUS ES welcomes the opportunity to provide feedback to Endeavour Energy's waiver application.

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

We acknowledge the challenges Endeavour Energy is facing and support its determination that smart metering technology is an efficient and cost-effective alternative to upgrading network infrastructure whilst providing additional benefits such as Power Quality data.

As a competitive metering service provider, we have reservations that aspects of the waiver application have the potential to set a precedent that distorts metering competition.

Metering Competition

Endeavour Energy is seeking for retailers to select a pre-defined MC for a solution that can be provided by other MCs. The waiver application is a continuation of the Albion Park trial where Endeavour Energy worked with a single MC (Intellihub).

Endeavour Energy's requirements should be transparent to allow other MCs to participate or choose not to be involved. Endeavour Energy has noted:

- *"...the project will not adversely impact competition and all retailers will be able to participate..."*
- *"...committed to engage with local retailers, and to provide a financial incentive sufficient to support the commercial arrangements between metering providers and affected retailers so that affected customers will not bear any charge or fee for the*



meter swap.” and

- *“...To implement the solution, Intellihub (a metering provider) and participating retailers requested that Endeavour Energy fail the associated network owned load control devices...”*

PLUS ES disagrees with Endeavour Energy’s supposition that the project will not adversely impact competition. Directing smart meter installations towards one contestable MC and locking out others, has the effect of improving that MC’s cost base and cost to serve.

PLUS ES would welcome further discussions in relation to this submission. [REDACTED]

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Sincerely,

A handwritten signature in blue ink, appearing to read "J. Clark".

Jason Clark
Executive General Manager