

20 March 2020

Submission on 15 Minute Planned Interruption Consultation  
Department for Energy and Mining  
Energy and Technical Regulation Division  
GPO Box 320  
ADELAIDE SA 5001

Submitted via email: [resources.customerservice@sa.gov.au](mailto:resources.customerservice@sa.gov.au) & [otrmail@sa.gov.au](mailto:otrmail@sa.gov.au)

Dear Sir/Madam

### **Change to Notice Requirements Relating to Planned Interruptions of Energy Supply**

Thank you for the opportunity to provide a submission to the South Australian Department for Energy and Mining on its Change to Notice Requirements Relating to Planned Interruptions of Energy Supply discussion paper.

Momentum Energy is a 100% Australian-owned and operated energy retailer. We pride ourselves on competitive pricing, innovation and outstanding customer service. We retail electricity in Victoria, New South Wales, South Australia, Queensland and the ACT. We offer competitive rates to both residential and business customers along with a range of innovative energy products and services. We also retail natural gas to Victorian customers.

Momentum Energy is owned by Hydro Tasmania, Australia's largest producer of renewable energy.

### **Regulation 14 of the National Energy Retail Law (Local Provisions) Regulation 2013**

Momentum is generally supportive of the proposal to extend this regulation that was introduced in 2013 to amend provisions of the National Energy Retail Rules (NERR) in South Australia. This regulation gave relief for South Australian Power Network (SAPN) from providing 4 business days' notice to customers for a planned power interruption when the interruption was for less than 15 minutes.

We note that this regulation was introduced for SAPN on the basis that the NERR was a more stringent requirement causing SAPN to amend existing processes that would result in higher costs. Another reason for special consideration for SAPN was that the National Energy Customer Framework commenced part way through the regulatory period for 2010 – 2015 where its revenue allowance had already been established.

## Amendment Options

Momentum believes that the regulation supports improved customer service for minor supply interruptions and for meter replacements. Therefore with the introduction of metering contestability on 1 December 2017 we believe that this regulation should now apply to both distributors and metering coordinators.

The extended regulation should also be amended in a manner that removes the expiry date and expands its coverage to both distributors and metering coordinators providing both with relief from the obligation to provide 4 business days' notice for planned supply interruptions that occur for less than 15 minutes.

Should you require any further information regarding this submission, please don't hesitate to contact me on 0478 401 097 or email [randall.brown@momentum.com.au](mailto:randall.brown@momentum.com.au)

Yours sincerely

[Signed]

Randall Brown  
Regulatory Manager