

10 September 2021

B2B Working Group  
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## **Coincident Service Orders for de-energisation and re-energisations**

The Public Interest Advocacy Centre (PIAC) is a leading social justice law and policy centre. We are an independent, non-profit organisation that works with people and communities who are marginalised and facing disadvantage. We ensure basic rights are enjoyed across the community through litigation, public policy development, communication and training. The Energy and Water Consumers' Advocacy Program represents the interests of low-income and other residential consumers, developing policy and advocating in energy and water markets.

PIAC welcomes the opportunity to respond to the pre-consultation discussion paper on coincident service orders for de-energisation and re-energisation. PIAC broadly supports the assessment provided in the discussion paper.

The existing prioritisation of consumer 'on-supply' is a necessary consumer protection measure, helping to ensure that consumers' connection to an essential service is maintained. The impact of this prioritisation must be retained in implementing processes to deal with coincident service orders where remote de-energisation and re-energisation processes are available.

PIAC does not consider it appropriate to assume rapid and universal adoption of remote de-energisation and re-energisation by retailers. The slow rollout of advanced metering and jurisdictional differences in the sanctioning of remote processes mean coincident service orders are likely to continue to be an issue for some time. The potential for significant impact and consumer harm through de-energisation in error requires adoption of a consistent approach that can be implemented as a matter of urgency.

PIAC prefers option 3(b) as the most suitable response to address the issue in the required timeframe. This option is implementable immediately and has the effect of continuing the current priority for customer 'on supply' where conflicting orders exist. Adopting this option now would allow for processes, such as the current review of the metering framework, to be completed and identify structural changes required.

PIAC welcomes further opportunity to discuss these or any other issues in more detail with the B2B working group.

Yours sincerely

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