

Mr Matt Zema Managing Director and Chief Executive Officer Australian Energy Market Operator GPO Box 2008 MELBOURNE VIC 3001

Dear Mr Zema

The Council of Australian Governments (COAG) Energy Council (the Council) has agreed to make changes to the jurisdictional metrology material contained in the Metrology Procedure which is established, maintained and published by the Australian Energy Market Operator (AEMO) under the National Electricity Rules (NER). These changes are being made in the context of new rules for metering in the National Electricity Market that will commence on 1 December 2017.

The Council intends to make changes to the jurisdictional metrology material in two tranches:

- The first tranche will make non-material changes, including updating terminology to align with the new rules.
- In the second tranche, the Council will consider whether further changes can be made to remove outdated material, harmonise jurisdiction requirements and better align with the policy intent of the new rules.

The first tranche of changes agreed by the Council is outlined in **Attachment A** to this letter, which can be included in AEMO consultations to update the Metrology Procedure at the next opportunity.

Yours sincerely

Rob Heferen

Chair

COAG Energy Council Senior Committee of Officials

22 June 2016



ATTACHMENT A

The following material is excerpted from the Metrology Procedure.

The Council of Australian Governments (COAG) Energy Council has agreed to make the following marked-up changes to the jurisdictional metrology material.

Metrology Procedure Part A

Clause 1.7: Definitions

Commission

Commission means the person specified in the following table for the relevant jurisdiction:

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Jurisdiction	Variation in accordance with jurisdictional policy
Victoria	Essential Services Commission under the Essential Services Commission Act 2001 (Vic);
South Australia	Essential Services Commission of South Australia;
Australian Capital Territory	Independent Competition and Regulatory Commission;
New South Wales	Independent Pricing and Regulatory <u>TribunalCommission;</u>
Queensland	Queensland Competition Authority;
Tasmania	Office of the Tasmanian Energy - <u>Economic</u> Regulator;

- 2.3.4 *Metering Providers*, who apply for accreditation to install only the whole-current *meter* of a type 5 or 6 *metering installation*, must be able to exhibit the following capabilities to the reasonable satisfaction of *AEMO*:
 - a) Design and specification of *metering* schemes, including:
 - 1. Knowledge and understanding of the relevant sections of the *metrology procedure* and the *Rules*; and
 - 2. Knowledge of equipment (*meters* and other components of a *metering installation*).
 - b) Installation of *metering installations*, including:

1. This clause only applies to a jurisdiction as specified in the following table:

.Jurisdiction	Variation in accordance with jurisdictional policy
New South Wales	where the <i>Metering Provider</i> for the installation of the <i>metering</i> <u>installation-and/or-data-logger</u> has been engaged by a person other than the <u>responsible person Metering Coordinator</u> , a requirement to only install a <u>metering installation-and/or-data-logger</u> provided by the <u>Metering Provider</u> (for provision of the <u>meter</u>) nominated by the <u>responsible person Mmetering Ceoordinator</u> , and to install the <u>metering installation-and/or-data-logger</u> so that the optical port, communications port, and/or visible display can be readily accessed for <u>meter</u> reading.

2. This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
Victoria South Australia Australian Capital Territory Queensland Tasmania New South Wales	the availability of trained and competent staff to install <i>metering</i> installations to determine that the installation-metering installation is correct
New-South-Wales	the availability of trained and competent staff to install metering installations to determine that the installation metering installation is correct and who are accredited by the NSW-Department of Industry and Investment Electricity Association of NSW as Level 2 Accredited Service Providers (ASP);

2.3.5 c) This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
Victoria South Australia Australian Capital Territory Queensland Tasmania	 Installation of <i>metering installations</i>, including: (1) the availability of trained and competent staff to install and test <i>metering installations</i> to determine that the installation metering installation is correct; and (2) the use of test and inspection procedures to confirm that the <i>metering installation</i> is correct and that <i>metering</i> constants are recorded and/or programmed correctly.

New South Wales	Installation of metering installations, including:
	(1) where the <i>Metering Provider</i> for the installation of the meter and/or data logger has been engaged by a person other than the responsible person metering coordinator, there is a requirement to provide the meter to that <i>Metering Provider</i> for installation;
	(2) where the Metering Provider for installation of the metering installation and/or data-logger has been engaged by the responsible personmetering coordinator, the availability of trained and competent staff to install and test metering installations to determine that the installation-metering installation is correct; and
	(3) where the <i>Metering Provider</i> for installation of the <i>metering</i> <u>installation-and/or-data-logger</u> has been engaged by the <u>responsible person metering coordinator</u> , the use of test and inspection procedures to confirm that the <i>metering installation</i> is correct and that <i>metering</i> constants are recorded and/or programmed correctly.

2.4.12 This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
New South Wales	The responsible personmetering coordinator must allow another person to engage a registered mMetering Provider for the purposes of installing the metering installation and/or data legger in accordance with the Rules, that is, to engage a registered mMetering pProvider under the NSW Accredited Service Provider scheme.

2.4.13 This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
New-South-Wales	The responsible personmetering coordinater must ensure that, where another person engages a registered mMetering pProvider for the purposes of installing the metering installation and/or data logger, a metering installation and/or data logger is provided to that mMetering pProvider by the mMetering pProvider engaged by the metering coordinator for the purposes of providing the metering installation and/or data logger.

2.4.17 The volumes of electricity flowing through *connection points*, referred to in clause 2.4.16, for each jurisdiction are specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
Victoria New South Wales Queensland	The volume threshold for a <i>connection point</i> must be determined from the annual consumption for the billing periods over the most recent 12 month period, or prorated over a 12 month period based on the Average Daily Load where consumption over the most recent 12 month period is not available. Where no consumption datametering data is available, the annual consumption may be calculated based on an engineering report or consumption datametering data from the <i>loads</i> of similar customers. Connection points may not be aggregated for the purposes of
	determining the annual consumption.
South Australia	The volume threshold for a <i>connection point</i> must be determined from:
	(1) the consumption at that <i>connection point</i> for any period of 12 consecutive months in the previous 2 year period, or
	(2) where such consumption data is not available or has not been accurately recorded, a <u>calculation</u> -estimate of the annual consumption at that connection point taking into account past electricity consumption levels, the electricity consumption capacity of plant and equipment, the operations for which electricity is required and any other matter considered relevant.
	Connection points may not be aggregated for the purposes of determining the annual consumption.
Australian Capital Territory	The volume threshold for a <i>connection point</i> must be determined from:
	(1) the annual consumption over the most recent 12 month period, or
	(2) from the annual consumption over the most recent 12 month period plus an allowance of 2%, or
	(3) estimated calculated where consumption over the most recent 12 month period is not available or has not been accurately recorded. Where no consumption data is available, the potential annual consumption may be calculated estimated having regard to relevant circumstances including, but not limited to:
	 (a) the consumption capacity of the connection point and the extent to which that capacity is likely to be utilised in the future;
	(b) any recent or proposed change in ownership or use of the premises supplied at the <i>connection point</i> ; or

Jurisdiction	Variation in accordance with jurisdictional policy
	(c) any recent or proposed increase in the consumption capacity of the connection point.
	Connection points may not be aggregated for the purposes of determining the annual consumption.

2.4.18 For connection points with a type 6 metering installation, the volume of electricity flowing through the connection point is to be less than "y" MWh per annum, where "y" varies according to jurisdiction, except for first-tier load type 6 metering installations that meet the requirements of clause 11.20.3(a) of the Rules.

The values of "y" applicable to a jurisdiction is specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
Victoria South Australia Australian Capital Territory	Value of "y" is 160 MWh per annum.
New South Wales	Value of "y" is 100 MWh per annum.
Queensland	Value of "y" is:
	a) 750 MWh per annum for end-use customers that are not Queensland Market Customers in accordance with (c), below, and,
	aa) For the period 1 July 2012 to 30 June 2013, 750 MWh per annum for end-use customers who cease to be Queensland Non-Market Customers on 1 July 2012 by operation of the Act and/or Queensland Electricity Regulation 2006, and,
	b) 100 MWh per annum for <i>Queensland Market Customers</i> in accordance with (c), below of this <i>metrology procedure</i> .
	c) The responsible personmetering coordinator must ensure that the meters installed in the type 6 metering installations under (a) and (b), above, are interval meters which must be capable of being upgraded for use in a type 4 metering installation without replacing the meter.
	d) 100 MWh per annum for <i>end-use customers</i> where:
	(i) card operated meters are installed in accordance with the regulatory framework, or
	(ii) <i>meters</i> are installed temporarily in a place other than the <i>meter's</i> permanent location.
Tasmania	Value of "y" is 150 MWh per annum.

.4.19 The volumes of electricity flowing through *connection points,* referred to in clause 2.4.18, for each jurisdiction are specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
Victoria South Australia New South Wales	The volume threshold for a <i>connection point</i> must be determined from the annual consumption for the billing periods over the most recent 12 month period, or prorated over a 12 month period based on the
Queensland Tasmania	Average Daily Load where consumption over the most recent 12 month period is not available. Where no consumption datametering data is available, the annual consumption may be estimated based on an engineering report or consumption datametering data from the loads of similar customers.

	Connection points may not be aggregated for the purposes of determining the annual consumption.
Australian Capital Territory	The volume threshold for a <i>connection point</i> must be determined from:
	(1) the annual consumption over the most recent 12 month period, or
	(2) from the annual consumption over the most recent 12 month period plus an allowance of 2%, or
	(3) estimated calculated where consumption over the most recent 12 month period is not available or has not been accurately recorded. Where no consumption datametering data is available, the potential annual consumption may be estimated having regard to relevant circumstances including, but not limited to:
	 the consumption capacity of the connection point and the extent to which that capacity is likely to be utilised in the future;
	(b) any recent or proposed change in ownership or use of the premises supplied at the <i>connection point</i>; or
	(c) any recent or proposed increase in the consumption capacity of the <i>connection point</i> .
	Connection points may not be aggregated for the purposes of determining the annual consumption.

2.5.1 This clause only applies in a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
Victoria, South Australia	(1) Should a <i>child</i> in an <i>embedded network</i> elect to purchase electricity from a Retailer other than the parent's Retailer, the responsible person metering coordinator must ensure that:
	(a) the <i>child</i> has an <i>interval meter</i> installed; and
	(b) the parent of the <i>embedded network</i> has an <i>interval</i> meter installed.
New South Wales	(1) Should a <i>child</i> in an <i>embedded network</i> elect to purchase electricity from a Retailer other than the parent's Retailer, the responsible personmetering coordinator must ensure that, at the time the <i>child</i> switches Retailer and at the cost of the <i>child</i> :
	 (a) if the parent has an interval meter that is settled on the basis of interval energy data, the child must have a type 4 or type 5 metering installation that is settled on the basis of interval energy data;

Jurisdiction	Variation in accordance with jurisdictional policy
	(b) if the parent has an accumulation meter or an interval meter that is settled on the basis of accumulated energy data, the child must have a type 6 metering installation or, if the child has an interval meter, that meter must be settled on the basis of accumulated energy data.
	(2) Where a <i>child</i> in an <i>embedded network</i> has switched Retailer in accordance with clause 2.5.1[NSW](1)(b) above and the parent subsequently:
	(a) installs an interval meter and elects to have its meter settled on the basis of interval energy data; or
	 (b) elects to have its existing interval meter settled on the basis of accumulated energy data in accordance with clause 3.4.2[NSW](3); or
	(c) elects to have its existing interval meter settled on the basis of interval energy data, the responsible personmetering coordinator must ensure that at the time the parent changes, and at the cost of the parent, the child's metering installation meets the requirements of paragraph (a) or (b) of clause 2.5.1[NSW](1) above, as applicable.
Australian Capital Territory	(1) The responsible personmetering coordinator must ensure that the metering installation is not for a child in an embedded network.
	(2) Where the metering installation is for a child in an embedded network, the responsible personmetering coordinator must ensure that additional metering is installed accordingly which ensures that the requirements of clause 2.5.1[ACT](1) above are met.

2.6.1 This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
Victoria	The responsible personmetering coordinator must ensure that a type 4 or type 5 metering installation is not replaced by a type 6 metering installation.
New South Wales	(1) The respensible personmetering coordinator must ensure that a meter, which meets the requirements of a type 5 metering installation, and is installed at a connection point consuming more than 100 MWh per annum and less than 160 MWh per annum, is not removed from a metering point, unless:

Jurisdiction	Variation in accordance with jurisdictional policy
	(a) the metering installation is to be replaced by a metering installation type 1, 2, 3, 4, or 5; or
	(b) the NMI is deregistered.
	(2) Where an interval <i>meter</i> has been installed in accordance with clause 3.4.2[NSW](1), the <i>responsible personmetering</i> coordinator must ensure that it is not replaced with an accumulation <i>meter</i> .
	(3) The responsible personmetering coordinator must ensure that a meter, which is a sample interval meter installed for the purposes of calculating a Controlled Load Profile, is not removed without the consent of the Local Network Service Provider.
	(4) The responsible personmetering coordinator must ensure that the energy consumed and measured by a meter, which is a sample interval meter installed for the purposes of calculating a Controlled Load Profile, is settled in the wholesale electricity market on the basis of a metering installation type 6.
South Australia	(1) Subject to clause 2.6.1 [SA](2), the responsible personmetering coordinator must ensure that a type 4 or type 5 metering installation is not replaced by a type 6 metering installation.
	(2) A type 4 or type 5 metering installation may be replaced by a type 6 metering installation in relation to a specified connection point where approved by the Minister and written notice of that approval has been provided to AEMO.
	(3) The responsible personmetering coordinator must ensure that a meter, which is a sample interval meter installed for the purposes of calculating the Controlled Load Profile, is not removed without the consent of the Local Network Service Provider.
Australian Capital Territory	(1) The responsible personmetering coordinator must ensure that a type 4 or type 5 metering installation is not replaced by a type 6 metering installation.
	(2) The responsible personmetering coordinator must ensure that where a meter capable of recording interval energy data is installed, the metering installation complies with the requirements of a type 4 or type 5 metering installation.
Queensland	(1) The responsible personmetering coordinator must ensure that an interval meter is not replaced by an accumulation meter.

Jurisdiction	Variation in accordance with jurisdictional policy
	(2) The responsible personmetering coordinator may convert a remotely read interval meter to a manually read interval meter in the consumption drops below 100MWh per annum.
	(3) The responsible personmetering coordinator must ensure that a meter, which is a sample interval meter installed for the purposes of calculating a Controlled Load Profile, is not removed without the consent of the Local Network Service Provider.
	(4) The responsible personmetering coordinator must ensure that the energy consumed and measured by a meter, which is a sample interval meter installed for the purposes of calculating the Controlled Load Profile, is settled in the wholesale electricity market on the basis of a type 6 metering installation.
Tasmania	(1) The responsible personmetering coordinator must ensure that a type 4 or type 5 metering installation is not replaced by a type 6 metering installation.
	(2) A type 4 or type 5 metering installation may be replaced by a type 6 metering installation in relation to a specified connection point where approved by the Minister and written notice of that approval has been provided to AEMO.

- 2.8.2 The <u>responsible person metering coordinator</u> must ensure that when each meter of a type 5 metering installation or meter of a type 6 metering installation is installed, it is checked such that...
- 3.4.2 This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
Victoria	Subject to clause 3.4.3[Vic], the <i>type 5 accumulation boundary</i> is zero MWh per annum.
New South Wales	(1) Subject to clause 2.6.1[NSW](4), the <i>type 5 accumulation</i> boundary is 100 MWh per annum.
	(2) Subject to clause 2.6.1[NSW](4), where an interval <i>meter</i> has been installed in accordance with clause 3.4.2[NSW](1) above, the reading of that interval <i>meter</i> may be changed from being read as a <i>metering installation</i> type 6 to being read as a <i>metering installation</i> type 5, at any time.
	(3) Where an interval <i>meter</i> has been installed in accordance with clause 3.4.2[NSW](1) above, the respensible personmetering coordinator must ensure that the reading of that interval meter

Jurisdiction	Variation in accordance with jurisdictional policy
	may only be changed from being read as a <i>metering installation</i> type 5 to being read as a <i>metering installation</i> type 6 when:
	(a) a transfer of the <i>end-use customer</i> to a new <i>Retailer</i> has been effected, or
	(b) the interval meter has been read as a metering installation type 5 for a period of at least 12 contiguous months with the existing Retailer.
South Australia	(1) The type 5 accumulation boundary is zero MWh per annum.
	(2) The responsible personmetering coordinator must ensure that the energy consumed and measured by a meter, which is a sample interval meter installed for the purposes of calculating the Controlled Load Profile, is settled in the wholesale energy market on the basis of a type 6 metering installation.
Australian Capital Territory	(1) In accordance with clause 2.6.1[ACT](2), the type 5 accumulation boundary is 100 MWh per annum.
	(2) If an interval <i>meter</i> has been installed for sites where the <i>type 5</i> accumulation boundary is less than clause 3.4.2[ACT](1) above, the reading of that interval <i>meter</i> may be changed from being read as a <i>metering installation</i> type 6 to being read as a <i>metering installation</i> type 5, at any time.
Queensland	The type 5 accumulation boundary is 750 MWh per annum.

3.4.3 This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
Victoria	Clauses 3.4.2[Vic] and 3.4.6 do not apply to type 5 metering installations installed on or after 27 February 2005. For type 5 metering installations installed on or after 27 February 2005, the type 5 accumulation boundary is 160 MWh per annum.
Australian Capital Territory	Clause 3.4.6 does not apply to the following <i>metering installations</i> : (1) for type 5 <i>metering installations</i> with consumption less than is specified in clause 3.4.2[ACT](1) where that <i>metering installation</i> is being read as a type 6.

3.4.4 This clause only applies to a jurisdiction as specified in the following table:

Canberra ACT 2601 Telephone: (02) 6243 7788 energycouncil@industry.gov.au

Jurisdiction	Variation in accordance with jurisdictional policy
Victoria	During the period in which the responsible personmetering coordinator is not required to collect interval energy data from any type 5 metering installation because of the operation of clause 3.4.3[Vic], if it does not collect interval energy data from that metering installation, it must collect accumulatedien energy data from that metering installation in accordance with this metrology procedure as if it were a type 6 metering installation.
Australian Capital Territory	During the period in which the responsible person metering coordinator is not required to collect interval energy data from any type 5 metering installation because of the operation of clause 3.4.2[ACT](2), if it does not collect interval energy data from that metering installation, it must collect accumulatedien energy data from that metering installation in accordance with this metrology procedure as if it were a type 6 metering installation.

3.4.5 This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
Queensland	(1) An interval <i>meter</i> installed at a <i>connection point</i> where the flow of electricity is less than 100MWh per annum will be read as an accumulation <i>meter</i> unless the <i>metering installation</i> is classified as types 1 to 4.
	(2) Subject to (3), an interval <i>meter</i> installed for a <i>Queensland</i> Market Customer where the flow of electricity is greater than or equal to 100 MWh per annum must be read as a remotely read interval <i>meter</i> .
	(3) Notwithstanding (2), an interval <i>meter</i> installed where the flow of electricity is greater than or equal to 100 MWh per annum and where the <i>connection point</i> has never had an <i>end-use</i> customer with a negotiated retail contract will be read as an accumulation meter by the Metering <u>Data Provider</u> .
	(4) Once interval meteringenergy data from an interval meter is transferred to AEMO, the interval meter must continue to be read as an interval meter unless the NMI is reclassified from a NMI equal to or greater than 100 MWh per annum to a NMI less than 100 MWh per annum, in which case the interval meter may be read as an accumulation meter.
	(5) A Local Network Service Provider is permitted to read the metering installation for its own purpose providing the reading

schedule is coordinated with the responsible personmetering
<u>coordinator</u> .

- 3.4.6 Subject to the dates specified in clause 3.4.3[Vic], for type 5 metering installations (excluding type 5 metering installations that are sample profile meters for the purposes of developing the Controlled Load Profile(s) in accordance with clause 13.3 of Metrology Procedure: Part B), the responsible persenmetering coordinator must:
 - a) Ensure that *interval metering data* is collected from the *metering installation* in accordance with the appropriate *service level procedure*; and
 - b) Use reasonable endeavours to ensure that *interval metering data* is collected from every type 5 *metering installation* once every three months and that this *metering data* is transferred to the *metering data* services database in accordance with clause 3.4.8.
 - c) This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
South Australia	The responsible personmetering coordinator must ensure that metering data is collected from the metering installations/associated data loggers and this metering data is transferred to the metering installation data services database of a type 5 metering installation at least once every 6 months.

Note: The effective date of this Jurisdictional provision is 22 September 2008. The review date of this Jurisdictional provision is 31 December 2011.

3.4.7 For type 6 metering installations, the responsible personmetering coordinator must:

- Ensure that accumulated metering data is collected from metering installations in accordance with the appropriate service level procedure;
 and
- b) Use reasonable endeavours to ensure that accumulated metering data is collected from every type 6 metering installation once every three months and that this metering data is transferred to the metering data services database in accordance with clause 3.4.8.
- c) This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
South Australia	The responsible personmetering coordinator must ensure that metering data is collected from the metering installations/associated data loggers and this metering data is transferred to the metering installation data services database of a type 6 metering installation at least once every 12 months.

Note: The effective date of this Jurisdictional provision is 22 September 2008. The review date of this Jurisdictional provision is 31 December 2011.

- 3.4.9 The responsible personmetering coordinator must use reasonable endeavours to ensure that metering data is collected from a type 5 or 6 metering installation and this metering data is transferred to the relevant metering data services database, no more than two business days prior to, or two business days subsequent to, the scheduled reading date for that metering installation.
- 3.4.9A This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy
Victoria	Nothing in clause 3.4.9 prevents the responsible personmetering coordinator from additionally collecting energy data from a type 5 metering installation and transferring that data to the relevant metering installation-data services database earlier than 2 business days prior to the scheduled reading date for that metering installation.

Note: The effective date of this Jurisdictional provision is 1 July 2009. The review date of this Jurisdictional provision is 31 December 2017.

- 3.6.4 The <u>responsible person metering coordinator</u> must ensure that <u>metering</u> data from the following is transferred to AEMO...
- 3.10.1 This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy			
New South Wales, South Australia, Queensland	AEMO must prepare a Controlled Load Profile(s) (CLP) for each relevant profile area in accordance with clauses 13.3.3 and 13.3.4 of metrology procedure: Part BSchedule 11 clause 2.1 and apply the CLP(s) by profile area to the consumption energy data from the applicable first tier controlled load accumulation meters and from the applicable second tier controlled load type 6 metering installations in accordance with clauses 13.3.3 and 13.3.4 of metrology procedure: Part BSchedule 11 clause 2.2 to produce trading interval data.			
	Note: This clause does not apply to Ergon Energy's distribution area			

3.10.5 This clause only applies to a jurisdiction as specified in the following table:

Jurisdiction	Variation in accordance with jurisdictional policy		
New-South-Wales Queensland South Australia Australian-Capital-Territory	AEMO must enable the transfer to AEMO of parameters for the calculation of a weekly load scaling factor, which represents the estimated consumption-energyaccumulated metering data for first-tier controlled loads.		
[Note – this is only applicable to SA]			

Metrology Procedure Part B

13.3.2 Profile Preparation Service – Controlled Load does not apply to the jurisdictions of the Australian Capital Territory, Tasmania, <u>and Victoria and Ergon Energy's distribution area</u>.