



wattwatchers  
DIGITAL ENERGY

May 16, 2017

Australian Energy Market Commission  
PO Box A2449 Sydney South  
NSW 1235

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**Re: AEMC, Review of regulatory arrangements for embedded networks,  
Consultation Paper, 11 April 2017, Sydney. Reference: RPR0006**

Wattwatchers is an Australian technology company specialising in the energy sector - specifically the monitoring/metering, data communication and control of electricity at circuit level in real time over the internet.

We note that this AEMC consultation process makes this comment: 'Improving technology and evolving business models bring both opportunities for innovation and benefits and potential new risks for consumers.'

In our view, the current regulatory approach is restricting end consumers in embedded networks from gaining the most cost effective access to numerous 'user interface' benefits associated with highly granular data on their engagement with and use of electricity.

It does this by requiring that electricity meters for billing purposes, even in embedded network scenarios, must be NMI-pattern approved as part of the application of Power of Choice.

While Power of Choice legitimately aims to protect consumers by allowing them to participate in the contestable retail marketplace, a negative side effect is that it negatively impacts on other consumer benefits such as lowest-cost access to new technologies aimed at empowering energy consumers with data.

We have encountered a number of instances where would-be embedded network operators have wanted to use Wattwatchers metering technology, but would still have been required to install so-called 'market meters' with NMI pattern approval as well.

Our devices provide Class-1 accurate revenue-grade metering, however are not NMI pattern-approved as billing meters due to technologically obsolete provisions of the National Measurement Act (1960). It is worthy of note that these rules not only pre-date the digital era, they even pre-date decimal currency in Australia.

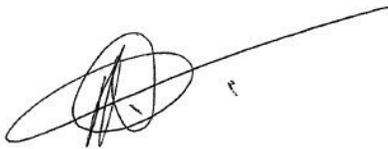
While we don't believe that the AEMC wants to restrict energy consumers from enjoying current and emerging Internet of Things (IoT) applications, that is nonetheless the consequence of the current model.

For embedded networks, and arguably more broadly, Wattwatchers contends that the AEMC should allow metering devices that meet all requirements for accuracy, security, comprehensiveness of data capture and verification regardless of the redundant 'form factor' requirements that are implicit for 'NMI pattern approved'.

The current situation is perpetuating a technological status quo that is no longer fit for purpose and is standing in the way of electricity consumers enjoying the full benefits of the digital/IoT era for energy.

Wattwatchers is very willing to expand on our brief submission including providing information on technological capabilities which extend from metering to behind-the-meter control functions.

Yours truly,

A handwritten signature in black ink, consisting of a large, stylized 'M' followed by a long horizontal line extending to the right.

Murray Hogarth, Director of Communications & Community Networks, Wattwatchers