

AEMC draft determination and rule: *Unlocking CER benefits through flexible trading*

Submission of NBN Co – 11 April 2024

NBN Co Ltd (**nbn**) is grateful to the Australian Energy Market Commission (**AEMC**) for providing an opportunity to comment on its draft determination and associated draft changes contained in the *National Electricity Amendment (Unlocking CER benefits through flexible trading) Rule* (the **Draft Rule**).

As the operator of the National Broadband Network (**nbn network**), **nbn** is responsible for the operation of a communications network providing essential voice and broadband services across Australia and its external territories. As **nbn** indicated in its previous submission, its network relies upon the national electricity grid as critical supportive infrastructure. Currently this presents 57,000 electricity grid connections which include 44,000 unmetered sites and 40,000 sites with battery backup. During the 12 months to February 2024, **nbn** consumed approximately 404 GWh of electricity, consistent with its status as one of Australia's largest electricity users. Given this, **nbn** is supportive of measures which increase competition in energy markets as a means to ensure that the prices it pays are as fair as possible.

nbn was heartened to read in the Draft Determination (at para 1.2.2) that most stakeholders supported the development of a framework for a new minor energy flow meter for street furniture. **nbn** notes, that consistent with its earlier submission, the Draft Determination highlights the potential benefits including improved energy efficiency, reductions in costs, and better allocation of unaccounted-for energy.

In reviewing the Draft Rule, **nbn** notes the shift from the broad concept of 'minor energy flow meters', to its operationalisation through the creation of a 'Type 9' meter, which would be applicable to, *inter alia*, **nbn** cabinets. **nbn** is supportive of this step of permitting it the flexibility to meter presently unmetered sites. While **nbn** may not elect to exercise this flexibility in all (or indeed many) cases, we consider its availability to be an important mechanism for encouraging meaningful competition in the energy market.

nbn is generally supportive of the proposal to have minimum technical standards for type 9 meters, including for these meters to be pattern-approved by the National Measurement Institute, and to have electronic data transfer facilities and facilities for storing interval energy data (per an extension of cl 7.8.2 of the NER).

In all, **nbn** welcomes the proposed changes as a means to increase competition and potentially reduce consumption costs. Should the AEMC wish to discuss anything contained in this submission further, it should contact Nirooshan Sachchithanathan (Executive Manager, Power Strategy and Resilience, Network Operation) on nirooshansachchithan@nbnco.com.au.

