

22 February 2008

Dr John Tamblyn
Chairman
Australian Energy Market Commission
Level 5, 201 Elizabeth St
Sydney NSW 2000
Australia

Dear Dr Tamblyn

Commencement of the Proposed National Electricity Amendment (Integration of NEM Metrology Requirements) Rules 2008

I refer to the notice issued by the Commission on 21 February 2008 that the period of time for preparing the final determination for above proposed Rule has been extended to 6 March 2008.

As you are aware, we are running a concurrent consultation on the metrology procedure that is dependant on this Rule change.

Clause 7.14.1(b) of the Rules requires that the consultation process for the metrology procedure must include a period of at least 3 months between the date when the metrology procedure is published and the date the metrology procedure commences. The extension will mean NEMMCO would no longer able to meet this requirement if the commencement date of the Rule is 30 June 2008.

We therefore request that the effective date of the Final Rule be extended to 31 July 2008. Our proposed schedule for the remainder of our metrology procedure consultation process is now as follow:

| Task | Duration | Start | End |
|---|----------|-------------|-------------|
| AEMC Final Rule determination | | | 6 March 08 |
| Close stage 2 consultation Metrology Procedure ¹ | | | 17 March 08 |
| Prepare final Determination Metrology Procedure | 30 days | 18 March 08 | 28 April 08 |
| Publish Final Determination Metrology Procedure | | | 28 April 08 |
| Jurisdictional review/update period | 3 months | 29 April 08 | 29 July 08 |
| Effective Date for Metrology Procedure | | | 31 July 08 |

¹ Allows a period for participants to consider impact of Final Rule determination on their Metrology Procedure consultation submissions

We consider an extension of the commencement of the Rule would be preferable to reducing the period between publication and commencement of the metrology procedure to 2 months as this would not provide sufficient time for the consequent changes to be made to other procedures.

If you have any queries please contact either myself on (02) 9239 9132, or Roy Kaplan, Manager Metrology Regulation, on (03) 9648 8806.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Nelson', with a long horizontal flourish extending to the right.

Brian Nelson
Head of Regulatory Affairs and Compliance