



24 April 2013

Lisa Nardi
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Project Reference Code: ERC0153

Dear Lisa,

Consultation Paper – National Electricity Amendment (Access to NMI standing data) Rule 2013 – ERC0153

AGL Energy Limited (**AGL**) welcomes the opportunity to comment on the Consultation Paper regarding National Electricity Amendments (Access to NMI standing data) Rule 2013 – ERC0153 (**The Paper**) published by the Australian Energy Market Commission (**AEMC**) in March 2013.

AGL supports the rule change proposal in the Paper. It will provide clarity and enable third parties access to NMI standing data if they are the agent of a registered participant for the purposes of customer acquisition, billing, settlements and customer transfers. As part of normal business practice retailers may engage a range of 3rd party providers to conduct and complete the sales process.

If access was removed it may have a major impact on retailers' sales processes. Standing data elements are required to ensure that a retailer can efficiently quote a customer with the correct rate and correct contract term and conditions. Standing data elements are also required to identify other related processes which may need to be initiated such as to ensure a customer can be energised and efficiently registered and managed for customer billing purposes. Other data elements that may be utilised from the Type 2 NMI Discovery process include but are not exhaustive are:

- NMI Class Code
- NMI Status Code
- TNI
- DLF
- Embedded Network Parent/Child Identifier
- Next Scheduled Read Date
- Network Tariff
- Meter Install Code
- Meter Status
- Register Status
- Time of Day
- Controlled Load
- Register Multiplier
- Data Stream Suffix
- Meter Number

For quoting purposes, at minimum access to NMI Standing Data and the relevant data elements is required as outlined in the current NMI Discovery Type 1 and Type 2 Processes published by AEMO.

It is vital to verify customers standing data to correctly identify a customer's address and NMI to ensure we are transferring and linking the customer to the correct premises and metering.

If access to standing data elements is removed for quoting purposes we anticipate that an increase in erroneous transfers and misquoting of customers parallel with an increase in customer and ombudsman complaints would occur.

Should you have any questions in relation to this submission, please contact Allicia Volvricht, Market Industry Advisor on (03) 8633 6357 or at AVolvricht@agl.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alex Cruickshank', is positioned above the printed name.

Alex Cruickshank
Head of Energy Regulation

- > Being selected as a member of the Dow Jones Sustainability Index 2006/07
- > Gaining accreditation under the National GreenPower Accreditation Program for AGL Green Energy®, AGL Green Living® and AGL Green Spirit
- > Being selected as a constituent of the FTSE4Good Index Series