



TO: Dr John Tamblyn, Chairman, Australian Energy Market Commission, PO Box A2449, Sydney South, NSW 1235

FROM: Mitch Webster, General Manager, Stream Information Limited

DATE: 25<sup>th</sup> July 2008

SUBJECT: Victorian Jurisdictional Derogation (Advanced Metering Infrastructure Roll Out)

Submitted: Via Email (submissions@aemc.gov.au)

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Dear Dr Tamblyn,

Stream Information Limited welcomes the opportunity to comment on the proposed change to the National Electricity Rules (NER) by way of jurisdictional derogation on the roll-out of advanced metering infrastructure (AMI) in the state of Victoria.

Stream is a New Zealand based specialised metering business that has been operating in a competitive market for metering services for some years. Stream Information limited is an Independent Meter Owner and supplier of smart metering services *direct to the End-User*.

It is from this perspective that for the reasons outlined below Stream would oppose the principles of a DNSP led roll out of AMI in Victoria.

At a general level, it is important to ensure competition drive outcomes that are in the medium to long term benefit of consumers. Establishing a regulatory monopoly through the proposed approach runs the risk of an overly regulated environment not entrenching technological solutions that do not have ultimate commercial value to either consumers or businesses.

While Stream appreciates the scale of the issue being addressed in Victoria is well beyond the scale of market that Stream normally operates, it is important for the Commission to consider any unintended or perverse consequences that may arise from the proposed set of arrangements.

As a specialised and independent meter provider, our business has been successful to date through ensuring that the services we provide are acceptable to our customers – typically non mass market customers such as commercial entities requiring time of use metering and real time information.

Our business provides a completely transparent price and service offering to the end use consumer, which drives efficient effective metering outcomes. We have also been fortunate to have been able to establish strong relationships with our customers which in turn help us to develop innovative solutions to their metering demands.

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Being a small independent metering company in a competitive market there are competitive pressures on us to ensure our services, functionality, technology and pricing remains superior. Our prices are also fully exposed to the market and not bundled with or obscured by the supply of other essential services.

We would urge you to consider ensuring that specialist metering providers are not excluded from the proposed arrangements in Victoria and that competitive arrangements are allowed to play a role in ensuring consumers get the metering services they would like and are prepared to pay for.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mitch Webster', with a stylized flourish at the end.

Mitch Webster  
General Manager  
Stream Information Limited