



7 March 2014

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted electronically

Dear Sir/Madam,

Re: EMO0028: Supplementary Paper – Regulatory Framework: Framework for Open Access and Common Communication Standards Review

The Australian Energy Market Commission (the Commission) has issued a Supplementary Paper on the Regulated Framework for Open Access and Common Communication Standards (the Supplementary Paper). In light of its submission to the Draft Report, Lumo Energy welcomes the opportunity to provide further commentary to the Supplementary Paper.

Lumo Energy is 100% owned by Infratil Limited, a company listed on the New Zealand and Australian Stock Exchanges. Lumo Energy currently retails across the National Electricity Market (NEM), and is one of the largest second tier energy retailers. As such, we have a keen interest in metering policies and their potential impact on our customers and competition in the market.

Draft Findings: Regulation of access and accreditation

Regulation required for access to smart meter functionality

Lumo Energy commends the Commission for recommending a framework that focuses on the customer's ability to choose a retailer, product or service. The ultimate framework must consider what new barriers to entry or competition may be introduced, through price, access or service.

The Commission has considered it prudent to undertake a competition review once the market is established to reconsider the need for regulation. Lumo Energy support the Commission's recommendation for a review, on the basis that the initiation and scope of the review is flexible to cater for any future considerations that must be made. Additionally, this review must also take into account the effort required to undertake the review, allowing suitable time and resources, to ensure that there is value in its completion.

Accreditation with AEMO

Lumo Energy supports the Commission's recommendation that parties who have responsibilities associated with managing access to smart meter functionalities are accredited with AEMO. Lumo Energy considers that where accredited parties are financially responsible in the NEM, to ensure that consistent obligations exist amongst energy providers and energy service providers, all these accredited parties must be a registered market participant with the same obligations.



Other Matters

Transitional Arrangements

Lumo Energy recommends that a minimalist approach is taken to the provision of transitional arrangements. Noting that some transitional measures need to be taken into consideration, the most benefit to consumers occurs where arrangements are consistent and nationally harmonised. Unnecessary jurisdictional derogations should be avoided where possible.

Please do not hesitate to contact Stefanie Macri on 03 9976 5604 to discuss this submission further.

Yours sincerely

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

Aneta Graham

General Manager, Regulatory Affairs & Corporate Relations
Lumo Energy Australia Pty Ltd