



20 September 2013

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

Submitted electronically

Dear Ms Nardi,

Re: ERC0153: Rule Determination - Access to NMI Standing Data

Lumo Energy welcomes the opportunity to make a submission in response to the Australian Energy Market Commission's (Commission) Rule Determination entitled National Electricity Amendment (Access to NMI Standing Data) Rule 2013 (the Rule Determination) as proposed by EnergyAustralia.

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, it has a keen interest in the outcome of this Rule Determination and the extent to which it promotes efficient investment in and operation of the NEM.

The Commission's decision as listed in the Rule Determination is supported by Lumo Energy. We commend the Commission for taking steps to add clarity into the National Electricity Rules (the Rules) and noting the impact of ambiguity on Retailers in the form of unnecessary compliance risks and costs.

Lumo Energy supports the proposed drafting contained within the Energy Retailers Association of Australia's submission. It is recommended that the terminology used in rule 8.6.2(b1) is consistent with the terminology used in the entirety of rule 8.6.2. The revised drafting further reduces the ambiguity of the Rules, promotes operational efficiency and limits unnecessary compliance risks and costs on Retailers.

Please do not hesitate to contact me on 03 8680 6439 or Stefanie Macri on 03 8683 2427 to discuss this submission further.

Yours sincerely

A handwritten signature in black ink, appearing to be "Aneta", followed by a long horizontal line extending to the right.

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