



27 July 2007

Mr John Tamblyn
Chairman
Australian Energy Market Commission
Level 16
1 Margaret Street
Sydney NSW 2000

Email: submissions@aemc.gov.au

Dear Mr Tamblyn,

Proposed National Electricity Amendment (integration of NEM Metrology Requirements) Rule 2007

Origin Energy (Origin) is pleased to respond to the Australian Energy Market Commission with comments regarding the proposed National Electricity Amendment (integration of NEM Metrology Requirements) Rule 2007.

Origin is supportive of industry's initiatives to move toward a national regulatory framework that promotes harmonisation of rules and procedures which apply to metering arrangements for all Jurisdictions.

Please find below comments addressing specific clauses in the proposed National Electricity Amendment (integration of NEM Metrology Requirements) Rule 2007.

Should you require further information regarding this submission please do not hesitate to contact Malcolm Hempel on 03 9652 5984.

Yours sincerely

Steve Clinch
Manager Energy Relationships
Origin Energy

Section	Issue / Comment	Proposed text
7.2.3 (d)	This clause, as written, would allow the LNSP to potentially charge exorbitant and unrealistic fees for the management of the RP role.	Remove this clause and extend (b) and (c) or make reference to a regulated rate for RP services as determined by the jurisdiction in (f).
7.3.1 (11b)	It is unclear as to what this clause is trying to achieve. It is understood that type 6 metering does not have the ability to store data.	Remove or qualify this clause.
7.7(a) 8	Clarification is required as to the period for which the FRMP's customer can request data and therefore the length of time the FRMP with the financial interest in the metering installation must hold the data.	It is suggested that the same timeframes apply as detailed in clauses 7.9.1 (f) and (g).
7.8.1	As the Local Retailer carries the financial risk of energy losses associated with faulty or unreliable security devices the security mechanisms accepted by NEMMCO should also be ratified by the Local Retailers.	Change 7.8.1 (a) to read: <i>The responsible person must ensure that a metering installation is secure and that associated links, circuits and information storage and processing systems are protected by security mechanisms acceptable to NEMMCO and ratified by Local Retailers.</i>
7.8.2 (ca)	<p>What constitutes a 'read only password'? 'Read only Password' should be a defined term. Also where 'read only' passwords are not available, direct access to the meter shall be denied to non market participants i.e. the FRMP's customer.</p> <p>As a general comment, Origin notes there is significant evidence that where a financial incentive exists to illegally modify (Hack) an electronic machine, such activities often occur. Two common examples are Pay TV systems, and WIFI internet access where passwords and security encryption have been readily overcome, and such Hacks are readily available for purchase. There is a real risk, especially in light of AIMRO type roll outs of Hacks being developed that allow illegal modification of meter programming to reduce measured consumption. Origin recommends that the AER is structured to only allow direct access to electronic meters by the minimum number of parties</p>	Subject to authorization by the <i>responsible person</i> , a <i>financially responsible Market Participant</i> shall provide a 'read only' <i>password</i> to its customer upon request except where 'read only' <i>passwords</i> are unavailable.

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	<p>required, and that the AER specifically excludes any form of electronic access to any parties apart from NEMMCO, their agents, and Meter Providers.</p> <p>Suggested definition:</p> <p>Read only Password means, but is not limited to, proprietary or open command protocols, communications protocols, internet addresses, logins, passwords or numbers, codes, computer languages, programs, commands, keys, functions, descriptions, instructions, telecommunication system access number sequences, to allow access to a type or brand or configuration of Metering Installation and Metering Equipment for remote retrieval of metering data only , where such a password is in it's entirety fully exclusive and independent of and includes no part or component or sharing of any write password.</p>	
7.9.4 (a)	<p>It is understood that it is the accredited agents of NEMMCO that are responsible for validation and substitution of metering data.</p>	<p><i>NEMMCO</i> or its agents are responsible for the validation and substitution of <i>metering data</i> for type 1, type 2, type 3 and type 4 <i>metering installations</i> which must be undertaken in accordance with the <i>metrology procedures</i>.</p>
7.9.4 (ab)	<p>It is understood that it is the MDP as accredited by NEMMCO, who is responsible for the validation, substitution and estimation of metering data.</p> <p>Note also that metrology procedures need to be italicized in this clause.</p>	<p>The meter data provider, as accredited by <i>NEMMCO</i>, is responsible for the validation, substitution and estimation of <i>metering data</i> for type 5, type 6 and type 7 <i>metering installations</i>, which must be undertaken in accordance with the <i>metrology procedures</i>.</p>
7.11.2 (ac)	<p>It is unlikely that the FRMP will discover that a seal has been broken or interfered with.</p>	<p><i>If a Local Network Service Provider, responsible person or Metering Provider</i> discovers that a seal protecting <i>metering</i> equipment has been tampered with or broken it must notify the <i>financially responsible Market Participant, local retailer and responsible person</i> within 5 <i>business</i> days.</p>

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S7.2.3 Item5	<p>As the Local Retailer (LR) carries the financial risk associated with the inaccuracy of unmetered supplies, it is suggested that the LR ratify any NEMMCO decision that determines a particular supply does not require metering.</p> <p>As a general comment, advances in metering technologies can now allow devices to be metered where they were once considered unable to be metered.</p>	<p>Item 5: A type 7 <i>metering installation</i> applies to the condition where it has been determined by NEMMCO and ratified by the <i>Local Retailer</i> that a <i>metering installation</i> does not require a meter to measure the flow of electricity...</p>
S7.3.2 Table S7.3.3 Table	<p>With respect to the asset management strategy as approved by NEMMCO, it is not clear as to what requirements the strategy is to meet so approval will be obtained. Again the Local Retailer will carry the financial risk if errors occur as a result of incomplete or flawed strategies.</p> <p>It is suggested that NEMMCO develop a set of requirements that the asset management strategy would be measured against for approval and that this set of requirements be ratified by the Local Retailers.</p>	