



22 December 2016

Jemena Limited  
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Via online submission

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Australian Energy Market Commission  
PO Box A2449  
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### **RRC0007, RRC0008, GRC0037, ERC0195 & ERC0196: Customer transfer rule changes**

Jemena welcomes the opportunity to comment on the Australian Energy Market Commission's (**AEMC's**) draft determinations on the 'Using estimated reads for customer transfers' and 'Improving the accuracy of customer transfers' rule changes to the National Gas Rules, National Electricity Rules and National Energy Retail Rules.

Jemena owns and operates the Jemena Gas Network (**JGN**) in NSW and the Jemena Electricity Network (**JEN**) in north-west Melbourne. JGN and JEN deliver gas and electricity to approximately 1.3 million and 330,000 homes and businesses respectively. We, therefore, we have a strong interest in these determinations that impact our customers.

#### **Jemena supports the draft determinations**

Jemena considers the AEMC has come to a reasonable and balanced view across their draft determinations. In particular, Jemena supports that:

- An address standard would be unlikely to have benefits that would outweigh the implementation and maintenance costs
- No changes are required to existing rules to transfer customers on estimated reads.

If you wish to discuss the submission, please contact Chris Stewart on (02) 9867 7000 or at [christopher.stewart@jemena.com.au](mailto:christopher.stewart@jemena.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to read "Usman Saadat".

**Usman Saadat**  
General Manager Regulation  
Jemena Limited