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Proposed changes to the National Electricity Rules - First Tier Metering Installation Requirements

AGL welcomes the opportunity to provide comments on the proposed changes to the National Electricity Rules- First Tier Metering Installation Requirements.

AGL supports the move towards a national regulatory framework, and to that extent welcomes rules, obligations and procedures that promote harmonisation of existing metering arrangements.

We support the work undertaken by NEMMCO to develop a single national metrology procedure for metering installation type 1-7 meters. AGL believes that bringing the current multiple jurisdictional metrology requirements into a single nationally consistent framework will create a more efficient regulatory environment and will increase the transparency of the operation of the National Electricity Market (NEM).

We have contributed to the NEMMCO led consultations on this rule change through the Metrology Reference Group and support the proposed rule changes that ensure the harmonisation of first tier connection points, which are currently under the responsibility of individual jurisdictions, into the NEM framework. We note however, that that the use of 'estimation' with respect to type 1-4 metering in proposed rule 7.9.4 can be misleading and suggest that it be removed.

Please contact Stephanie Bashir, Industry Adviser on 03 8633 6836 if you wish to discuss the submission in more detail.

Yours Sincerely,

A handwritten signature in black ink that reads "Sean Kelly". The signature is written in a cursive, flowing style.

Sean Kelly
General Manager Energy Regulations