

19 May 2006

Mr John Tamblin
Chairman
Australian Energy Market Commission
Lvl 16, 1 Margaret St.
Sydney
NSW 2000

Agility Metering Consultation Response – National Electricity Rules Amendment to facilitate metrology harmonisation and replace existing derogations

Dear John

Agility Metering welcomes the opportunity to make this submission in response to the AEMC consultation on National Electricity Law – Proposed National Electricity Rules change.

Agility Metering provides comments and recommendations for the following specific provisions of the proposed amendments to Chapter 7 of the National Electricity Rules.

Responsible Person - Date of Responsibility

The proposed Chapter 7 of the National Electricity Rules states that, under clause 7.2.5(h), the responsible person must

in its role as incoming *responsible person*, be responsible for the *metering installation* on the day that a *market load* transfers from one *financially responsible Market Participant* to another *financially responsible Market Participant* for the period as specified in the *Market Settlements and Transfer Solution Procedures*.

While this clause reflects the current industry practice, it limits the development of initiatives that would overcome existing industry concerns about Participant responsibilities during meter churn.

The current Meter Churn Data Management Rules and industry practice, recognise that meter changes before customer transfer are required to support the application of contracts that are being established by Retailers with their customers. This practice, however, leads to the situation where the MSATS nominated, responsible person, metering provider and meter data provider are not associated with the metering at a connection point. The MSATS nominated parties are therefore unable to fulfil their market obligations following a meter churn. The parties having the association with the metering at the connection point are not recognised in MSATS until the transfer date.

This situation introduces unacceptable data risks and regulatory risks for the MSATS nominated parties.

The Transfer Procedures Working Group and Meter Data Provision Working Group have provided in principle approval for a proposal to overcome this problem and the proposal is currently under review by NEMMCO to determine its feasibility. The proposal recommends that a two-stage transfer is introduced whereby the responsible person, meter provision and meter data

provision roles transfer on the meter change date and the retailer change occurs on another date.

In order for initiatives such as this to be supported by the Rules, Agility Metering recommends that clause 7.2.5(h) is re-worded as follows.

7.2.5 (h) in its role as incoming *responsible person*, be responsible for the *metering installation* on the day that a *market load* transfers from one *financially responsible Market Participant* to another *financially responsible Market Participant* for the period as specified in the *Market Settlements and Transfer Solution Procedures* or on a day as otherwise specified in the *Market Settlements and Transfers Procedures*.

Yours faithfully

DAVID RIPPER

Regulatory & Quality Manager
Agility Metering

cc

ESTHER DAVID

Manager Specialist Metering
Agility Metering