



Tel: 02 9921 2999
Fax: 02 9921 2552

AGL Energy Limited
ABN 74 115 061 375

St Leonards
72 Christie Street
St Leonards NSW 2065

Locked Bag 1837
ST LEONARDS NSW 2065
www.agl.com.au

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

By email to submissions@aemc.gov.au

RE: Draft Rule Determination- Integration of NEM Metrology Requirements

AGL welcomes the opportunity to provide comments to the Australian Energy Market Commission ("AEMC") on the draft determination rule changes – Integration of NEM Metrology requirements.

AGL supports the move towards a national regulatory framework, and to that extent welcome rules, obligations and procedures that promote harmonisation of existing metering arrangements. AGL supports the work undertaken by the National Electricity Market Management Company ("NEMMCO") to review and recommend amendments to the rules pertaining to metrology as well as the development of a single national meteorology procedure for metering installation type 1-7 and have participated in the NEMMCO led Metrology Reference Group.

While AGL agrees with the majority of the proposed rule changes including amendments suggested by the Commission, there are some proposed changes that AGL either does not support or suggests that further consideration to content is required. These are set out below:

Rule Change Proposal no. 8 - Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – process for the conduct of a participant requested meter test.

While the proposed Rule change helps in meeting customer expectations in terms of meter testing through their retailer, NEMMCO and the responsible person, AGL considers that the framework surrounding this clause and the subsequent drafting by the Commission does not meet the original intent of the proposed Rule change, which was to differentiate between routine testing, and testing requested by a customer. AGL therefore does not support the revised rule as suggested by the Commission, but would support the original draft proposal put forward by NEMMCO.

Rule Change Proposal no. 9 - Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – record keeping

AGL requests that the references to "compliance of equipment" and "metrology related records" be clarified in terms of what information is being referred to and for which of the obligation these relate to.

The requirement of record keeping for 20 years seems onerous and unnecessary considering that generally there is a statutory limitation on actions of 6 years.

AGL is keen to assist the Commission in finalising the rule changes, therefore please contact Stephanie Bashir, Industry Adviser on 03 8633 6836 if you wish to discuss the submission in more detail.

Yours Sincerely,



Sean Kelly
General Manager Energy Regulation