



**19 September 2013**

Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

**Reference: ERC0153**

Dear Sir/Madam,

**Draft decision – National Electricity Amendment (*Access to NMI Standing Data*)  
Rule 2013**

AGL Energy Limited (**AGL**) welcomes the opportunity to comment on the National Electricity Amendment (Access to NMI Standing Data) Rule 2013 (**the Draft Rule**) published by the Australian Energy Market Commission (**the AEMC**).

As we stated in our previous submission<sup>1</sup>, AGL supports the rule change proposed by Energy Australia and understands that the AEMC considers the Draft Rule will provide clarity in the National Electricity Rules (**NER**) with respect to retailers, their service providers and entitlement and disclosure of NMI Standing Data.

In general, AGL supports the Draft Rule. It is our view, however, that the current drafting of clause 8.6.2(b1) could be interpreted to:

- require retailers to extract data from MSATS to pass on to their service providers; and
- limit a retailer's service provider to access NMI standing data only, thus removing the rights to access information such as metering data.

AGL proposes the wording of clause 8.6.2(b1) be amended to read:

“(b1) (**service providers**): the use, disclosure and reproduction of information by a person who requires the information for the purposes of providing services in connection with the Registered Participant's supply or sale of electricity to end users.”

Should you have any questions or wish to discuss matters in relation to this submission, please contact Sallie Proctor on (03) 8633 7871

Yours sincerely

**Alex Cruickshank**  
**Manager Metering and Market Interactions**

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<sup>1</sup> AGL Submission dated 24 April 2013

- > Being selected as a member of the Dow Jones Sustainability Index 2006/07
- > Gaining accreditation under the National GreenPower Accreditation Program for AGL Green Energy®, AGL Green Living® and AGL Green Spirit
- > Being selected as a constituent of the FTSE4Good Index Series