

11th February 2021

Alisa Toomey
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000

Re: Review of the Regulatory Framework for Metering Services EM00040

Dear Alisa,

Thank you for the opportunity to provide our response to the AEMC's consultation regarding your review of the regulatory framework for metering services. It is Landis+Gyr's view that smart meters in the NEM are under-utilised in light of their true potential and not optimally deployed. The pace of change in the industry requires these issues to be addressed in order to facilitate an efficient and reliable market. Landis+Gyr is therefore supportive of this review by the AEMC.

Landis+Gyr would be pleased to contribute further to the AEMC's consultation process. In summary we believe:

- meters in their current specified and compliant form have more to offer to the market and, in the majority, are not currently fully enabled to contribute to their full potential.
- the full benefit from meters relies to a large degree on their breadth of deployment. An increase in the speed of roll-out would provide benefit to the energy industry and society as a whole.
- meter technology is improving across the globe and while current meters can contribute strongly to existing and future market needs, this new technology should be taken into account.

Operating for over 120 years Landis+Gyr is a global organisation with local presence in more than 30 countries. Worldwide, we have deployed more than 300 million meters to customers and we have become the leading provider of integrated energy management solutions for the utility sector. Offering one of the broadest portfolios in the market, Landis+Gyr delivers innovative and flexible solutions to help utilities solve their complex challenges in smart metering, across electricity, gas and water, grid edge intelligence and smart infrastructure. With sales of USD 1.8 billion, Landis+Gyr employs approximately 6,000 people in over 30 countries across five continents, with the sole mission of helping the world manage energy better. Australia is one of our key markets and we are committed to supporting future industry needs through innovation, value-add and reliability of our products and services, while helping to reduce costs.

Our focus is on providing leading technology, meters that have advanced features and a roadmap to support future industry requirements. We always welcome the chance to work with participants and stakeholders to understand their long-term requirements as input to our roadmap. Accordingly, we are excited to have the opportunity to contribute to this consultation.

Landis+Gyr has extensive experience with high volume meter roll-outs. Our key learning from our global teams and our Australian experience is that billing, network and engineering data from smart meters can have broad benefits across multiple stakeholders: retailers, metering service providers, distribution businesses, generators, aggregators and of course consumers. Furthermore, the benefits grow exponentially with the volume and availability of data. We share the view of many industry groups and stakeholders that Power of

Choice (PoC) smart meter roll-outs rates have not been as high as expected given that the energy industry and society overall would benefit from a faster roll-out.

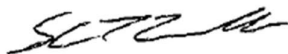
When utilised adequately, information from meters both within Australia and also globally has now proven to benefit network management and support other customer benefits beyond billing and market settlement. Many service providers are now harnessing relevant meter data often in real time and we see the market demand for these services only increasing. In addition, Landis+Gyr believe that the capability of existing meters that are compliant with the NER's current minimum specification is higher than the general view across the industry, meaning that existing meters have more to contribute than is typically utilised. In other words, smart meters can be leveraged more in Australia in their current form to support energy stakeholders.

With adequate broad deployment smart meters become uniquely placed in the energy network to provide value-added services. Positioned at every household in the future and highly regulated to comply with standards of accuracy and reliability, they have a trusted and proven role in the supply and trade of electricity. In addition, the current PoC framework provides a secure, understood and proven communication infrastructure. Given this combination of regulated and proven capability in data management, along with control capabilities at the premise and overlaid with a firmware upgradeable feature set, Landis+Gyr believes the meter is the right device for value-added services at the customers point of connection – particularly anything linked to a commercial transaction or security and reliability of the network. For example, the meter undoubtedly has the capability to assist in the management of renewable energy resources and the support of ancillary and other market services.

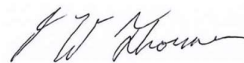
If there is any doubt about the capability of meters to support specific and/or specialised requirements now and in the future, then these requirements should be defined so they can be considered. The use of meters to provide new services requiring different measurement data would conceivably be a small increment to the current regulatory structure.

In conclusion, Landis+Gyr wholeheartedly supports a market-led roll-out and the Power of Choice reforms. While, as a technology supplier, we remain largely agnostic to the specifics of the market structure and process, we strongly support further discussion and reform that will help increase the rate of meter rollouts and bring further benefits to energy stakeholders and society as a whole. Landis+Gyr remains available to provide expert opinion on the capability of metering technology as well as the process for developing functionality and supply chain aspects.

Yours sincerely,



Opi Taumalolo
Head of ANZ Product Management



Joe Thorne
Regulatory Lead ANZ