

13 December, 2007

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

Email: [submissions@aemc.gov.au](mailto:submissions@aemc.gov.au)

Dear Dr Tamblyn

## Amendments to the National Electricity Rules to Integrate First Tier Metrology

Thank you for the opportunity to comment on the draft determination to make a series of Rule changes regarding the metering arrangements in the National Electricity Market released on the 18 October 2007.

ETSA Utilities comments regarding the proposed changes are attached.

Please do not hesitate to call Peter Bucki on (08) 8404 5679 or email to [bucki.peter@etsa.com.au](mailto:bucki.peter@etsa.com.au) if you require any further information in relation to this matter.

Yours sincerely



Grant Cox  
Manager Asset Owner

<p style="text-align: center;"><b>Proposed Changes to the National Electricity Rules</b> <b>First Tier Metering Installation Requirements</b></p>	<p style="text-align: center;"><b>ETSA Utilities Comments</b></p>
<p><b>4.13 Rule Change Proposal no. 13 - Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – metering installation malfunctions</b></p>	<p>ETSA Utilities has concerns regarding the requirement in clause 7.11.2(a)(1) and (2) that a malfunction must be repaired within a prescribed number of business days “after the malfunction was detected or ought reasonably to have been detected”.</p> <p>We consider that the “ought reasonably to have been detected” should be deleted as the phrase introduces subjectivity in determining whether the relevant party has breached their obligations or not.</p>