

Dr John Tamblyn
Chairman
Australian Energy Market Commission
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Dear Dr Tamblyn

TransGrid Submission to the AEMC on the Draft Determination and Draft National Electricity Amendment - Integration of NEM Metrology Requirements

TransGrid would like to thank the AEMC for the opportunity to comment on the draft determination and draft National Electricity Amendment to integrate Tier 1 metering installation requirements into the National Electricity Rules.

Please find attached comments that address the draft National Electricity Amendment specifically affecting the proposed Rule change to clause 7.9.1 Metering Databases.

The attachment sets out TransGrid's specific response on this matter.

I trust the attached comments are of assistance to you. Should you wish to discuss any of these matters further, please feel free to contact me on (02) 9284-3434 or via email: phil.gall@transgrid.com.au

Yours sincerely

Phil Gall 12/12/07

Philip Gall
Manager/Regulated Transmission Access

***TransGrid Submission on the Draft Determination and Draft National Electricity Amendment
(Integration of NEM Metrology Requirements) Rule 2007***

In general, TransGrid supports the proposed Rule changes to integrate first tier metering installations into the provisions of the National Electricity Rules Chapter 7 Metering as set out in the draft determination and draft National Electricity Amendment.

There is, however, one proposed Rule change that TransGrid recommends further changes be made for the reasons set out below:

Clause 7.9.1 Metering Databases

The draft determination currently assigns responsibility for ensuring that *metering data* in respect of *metering installations* is retained for a period of 7 years for Types 1-4 *metering installations* to both the *responsible person* (sub-clause 7.9.1(f)) and the *Metering Data Agent* (sub-clause 7.9.1(i)).

Under the current *Rules*, there is no requirement for the *responsible person* to provide this facility, and this responsibility is solely allocated to the *Metering Data Agent* by virtue of the "Service Level Requirements: Metering Data Collection, Processing and Delivery Services for Metering Data Agents Category Installation Types 1-4" and the "MDA Services Deed" executed by the Metering Data Agent with NEMMCO.

To introduce a requirement for the *responsible person* to also provide these same facilities provides no additional market benefit, and can only result in increased industry and consumer costs. It would therefore not be expected to meet the NEM objective's "efficiency and consumer cost benefit" requirements.

It is recommended that the drafting of this clause be modified to read:

- (f) The person who is required under Chapter 7 to collect the *metering data* from a *metering installation* for the purpose of *settlements* must ensure that:
 - (1) the data is stored separately and retained for a period of 7 years in the form in which it was collected;
 - (2) a separate record of each adjustment or substitution to the *metering data* in respect of a *metering installation* is stored separately and retained for a period of 7 years.
- (g) For all types of *metering installations*, the *metering database* must contain *metering data* that is retained:
 - (1) *online* for 13 months in an accessible format; and
 - (2) following the retention under subparagraph (1), in archive in a form that is accessible independently of the format in which the data is stored for a period of 5 years and 11 months.

The recommended changes above replace the draft Rule sub-clauses 7.9.1(f) through (i) and will maintain the existing NEM arrangements and responsibilities for both wholesale (Types 1-4) and retail (Types 5-7) markets as defined under the current *Rules* and the various NEMMCO *Metering Data Provider Deeds* and *Service Level Rules* documents.