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Australian Energy Market Commission
Level 5
201 Elizabeth Street
Sydney NSW 2000

29 January 2014

RE: EMO0028 - Landis+Gyr Submission
AEMC's Framework for Open Access and Common Communications Standards Review

Dear Mr Campbell

Landis+Gyr would like to thank you for the opportunity to provide feedback to your draft report on Framework for Open Access and Common Communications Standards Review (dated 19 December 2013) and also for the opportunity to participate at the stakeholders' group sessions.

Landis+Gyr is in general agreement with the AEMC's draft position on Open Access and Interoperability in creating a framework to meet Australia's specific metering and metrological requirements in the proposed meter contestability operating environments.

Based on Landis+Gyr's international and local experiences in the participation, development and deployment of Open Access and Interoperability standards, we have highlighted key issues that may impact implementation time for meter contestability, for your consideration.

1. Selection of Common Market Protocol

Landis+Gyr concurs that Australia needs to adopt an internationally accepted common market protocol. Although DLMS/COSEM standard is a widely accepted standard for electricity metering data exchange, the open access issue addressed by market mechanisms around the world has been primarily supported by the IEC CIM standards, in particular IEC CIM 61968-9, rather than a meter device centric standard such as DLMS. For this reason, we believe a CIM compliant protocol - a result of standards

harmonisation between North America (EPRI/NIST) and European (CEN/CENELEC/ETSI) standards bodies into a single international body (IEC) - the IEC CIM 61968-9 is most appropriate.

2. Maintaining the Common Market Protocol

Landis+Gyr agrees that AEMO is best positioned to be the entity responsible for maintaining protocol and ensuring it is in alignment with the international standards bodies and local sector requirements.

Landis+Gyr views AEMO as an objective, unbiased and transparent facilitator. We would like to stress that the AEMO's selection of working group members, for the design and approach of these initiatives, needs to ensure broad participation, including metering vendors, to contribute towards considered outcomes for the value chain.

3. Common Meter Protocol

Landis+Gyr has observed that there is presently no broad agreement on a common meter protocol, and we foresee the challenges in obtaining an agreed position for inclusion in the final recommendations. This would adversely impact the implementation timeline for metering contestability. For this reason we strongly suggest that implementation of Common meter protocol is not included as one of the recommendation in the final report.

There are advantages in implementing international standards such as DLMS/COSEM (IEC 62056) and ANSI C12.18/19 which are both strong candidates. In Victoria, the AMI deployment is supported by ANSI 12.19 standard and as such provides for an easier migration path.

If an outcome of this regulatory process is to source international meters in favour of attaining economies of scale via global volumes, it would be appropriate to use the IEC based standards such as DLMS/COSEM. As such, it would necessitate the development of country (Australia) companion specification for COSEM through extensive

participation of utilities, vendors and standards authorities. This will take time and resources to complete. To this extent, if AEMC believes this function will support market driven outcomes, Landis+Gyr recommends this task / activity commence immediately, in parallel to the finalising the Open Access and Common Communications Standards recommendations.

4. Nature of Services Provided

Landis+Gyr is of the opinion that it will not be feasible to regulate for compliance on the potentially numerous unknown and unpredictable future technological innovations and solutions.

In summary, Landis+Gyr's recommendations have focused on the least risk options by adopting internationally accepted protocols and standards with minimal regulation. In addition to delivering the most effective commercial outcomes, it will also facilitate speed to market for metering contestability.

If there is any aspect of this submission you would like to discuss in greater detail, please contact Milan Vrkic on +61 2 9690 7494.

Yours Sincerely



Milan Vrkic
General Manager Marketing & Portfolio Management