

13 October 2006

Mr 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 Mr Tamblyn,

#### **Draft National Electricity Amendment (Metrology) Rule 2006**

Origin Energy (Origin) is pleased to respond to the Australian Energy Market Commission with comments regarding the Draft National Electricity Amendment (Metrology) Rule 2006.

Origin is supportive of industry's initiatives to move toward a national regulatory framework that promotes harmonisation of rules and procedures which apply to metering arrangements for all Jurisdictions.

Please find below comments addressing specific clauses in the Draft National Electricity Amendment (Metrology) Rule 2006.

Clause 7.2.3	P4	Responsibility of Local Network service Provider
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Origin believes that the clauses under this section do not clearly articulate the default position for assuming the responsibility for all metering types. Clause 7.2.3 (a) identifies the Local Network service provider as the default responsible person for metering types other than 1, 2, 3 and 4. However clause 7.2.3 (b) would seem to indicate that by requesting the Local Network Service Provider to be the responsible person, then by default, the Market Participant is the responsible person for these metering installations.

Clause 7.2.5 (e)	P6	Role of the responsible person
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Origin understands that the responsible person is responsible for the metering installation from the time of the completion of the transfer in the Market

Settlements and Transfer Solution system but is seeking clarification on clause 7.2.5 (e) 1 as to how this can occur 'on any other day'.

Clause 7.3.4(e)	P9	Metering installation types and accuracy
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Origin suggests the following change to the clause:  
'Subject to the metrology Procedure and this clause 1.3.4, a financially responsible market participant may make arrangements with the responsible person to alter any type 5 or 6 metering installation to make the installation capable of remote acquisitions.'

By including the responsible person, it is made clear with whom the financially responsible Market Participant must make arrangements to alter the metering.

Also type 7 metering is excluded, as by definition, it is an unmetered supply.

Clause 7.3.4 (i)	P10	Metering installation types and accuracy
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It is suggested that as a result of the alteration to 7.3.4 (e) above, this clause is now no longer required as the financially responsible Market Participant makes arrangements with the responsible person who would therefore know about the metering alteration prior to it being made.

Clause 7.3.4 (g)	P10	Metering installation types and accuracy
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Origin suggests that the words 'but not limited to' be inserted after ...may include... indicating that items 1 and 2 are just two examples of why 'operational difficulties' may not alter the classification of the meter.

Should you require further information regarding this submission please do not hesitate to contact Malcolm Hempel on 03 9652 5984.

Yours sincerely

Steve Clinch  
Manager Energy Relationships  
Origin Energy