



Ms. Lisa Nardi  
SENIOR ADVISOR  
Australian Energy Market Commission  
Level 5  
201 Elizabeth Street  
Sydney NSW 2000

29 May, 2014

Dear Ms. Nardi

**RE: Secure Australasia's response to AEMC's Consultation Paper – National Electricity Amendment (Expanding Competition in Metering and Related Services) Rule 2014 / National Energy Retail Amendment (Expanding Competition in Metering and Related Services) Rule 2014.**

Thank you for the opportunity to provide a response to the AEMC's consultation paper, as referenced above, released on the 17<sup>th</sup> April 2014. In line with our previous submission on this topic Secure have limited its comments specifically to the areas of our expertise, namely, metering specification and effective deployment models that act as an enabler to DSP adoption and support.

Secure Australasia, through its parent company Secure Meters Limited, are a global leader in the development and manufacture of Smart Meters and associated Energy Monitoring and Automation product. Working across the major regions of Asia, Europe and Australia, Secure has more than 30 years experience in this domain starting with the first AMI smart meter designed in the 1970's. More recently Secure is a lead supplier of AMI meters to the Victorian AMI program having delivered over 1.3M AMI meters to 4 of the 5 distribution businesses.

**Question 7**

***How would the proposed jurisdictional arrangements impact on the proposed approach for competitive provision of metering and related services?***

**Question 8**

***Should SCER's proposal for prescribing Metering Coordinator exclusivity be limited to certain metering types? If yes, what are the metering types that should be considered?***

A primary goal of the change request is to establish a competitive regime to enable widespread investment in advance metering technology to enable DSP.

Allowing jurisdictional arrangements to provide exclusivity for any meter type will work against open competition and the intent of the market reforms and opens an opportunity to allow a jurisdiction to partially or completely halt the propagation of competition, metering advancements and consumer cost reductions.

It could be reasoned that at the level of basic accumulation meters the consumer benefits to switch meter coordinator will be limited such that transition is unlikely and that allowing exclusivity will allow the metering

