



Australian Energy Market Commission

17 October 2017

To whom it may concern,

RE: Secure Meters (Australia) response to AEMC Draft determination – Five Minute Settlement

Thank you for the opportunity to provide a response to the Commissions draft determination regarding five minute settlement.

Secure Meters (Australia), 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 and Secure is a lead supplier of AMI meters to the Victorian AMI program having delivered over 1.4M AMI meters to 4 of the 5 distribution businesses.

More recently, Secure is an accredited Meter Data Provider for Type 3 and 4 meters and will be supplying and reading meters in the contestable market under Power of Choice.

From 1 December 2018, all new and replacement type 4, 5 and 6 metering installations will need to record and store five minute data.

A handwritten signature in blue ink, appearing to read "Michael".

Secure supports the commissions draft rule and the objective to transition to five minute settlement but has concerns with the need for all new and replacement meters to provide 5 minute data from December 2018 and the consequent significant cost associated and reduction in transition period for communication, back-office and B2B systems to facilitate this by December 2018.

All Secure's current meters, and those supplied in the Victorian roll-out are capable of being reconfigured to record 5 minute interval data. However, Secure believes it would be significantly more cost effective to allow new and replacement meters to continue to record and provide 30 minute data until the end of the transition period July 2021, at which time the meters can be remotely reconfigured to 5 minute interval. This approach will ensure that all meters are capable and ready for 5 minute interval recording without the burden of excessive data communication and aggregation costs in the short term.

In particular, the shift from 30 minute to 5 minute interval will have a significant impact on data collection systems and communication networks. The Victorian government has over recent months been working on drafting an Order in Council to defer metering competition in Victoria until at least 2021, with a particular emphasis on ensuring that the existing systems are maintained and no further consumer costs are incurred. If, as currently drafted, the 5 minute data must be recorded and provided for all new and replacement meters during the Transition period, this will trigger significant system upgrade costs in Victoria. The communication network will require upgrade to accommodate the increase in data, back-office systems will require upgrade

Secure Meters (Australia) Pty Ltd
258 Darebin Road
Fairfield VIC 3078
Australia

p: +61 3 9485 6000
f: +61 3 9485 6099
e: info@securetogether.com.au
www.securetogether.com

ACN: 128 484 980
ABN: 28 129 484 980

and modification to store and manage the 5 minute data and systems updated to aggregate 5 minute interval data into 30 minute data until such time that new Meter Data File Format (MDFF) has been finalized and implemented in the market B2B e-hub.

Secure notes that although the commission has recognized the costs and risks of implementation, the requirement for new and replacement meters to provide 5 minute data from December 2018 effectively reduces the transition period to one year for the communication and back-office systems as this would need to be complete and in-place by December 2018 to be able to read and manage the 5 minute data recorded by these meters.

Secure therefore recommends a minor amendment to Clause 11.100.4 of the NER as follows:

11.100.4 *New and replacement meters*

*From 1 December 2018 until the commencement date, the Metering Coordinator at a connection point must ensure that all new and replacement metering installations must be capable of recording and providing, and **capable of being** configured to record and provide, trading interval energy data as defined under new Chapter 10.*

Finally Secure would re-affirm its support in the transition to five minute settlement and like thank the Commission for the opportunity to comment.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R Metherell', followed by a period.

Richard Metherell

Technical Services Manager

Secure Meters (Australasia) Pty. Ltd.