

15 February 2008



Dr John Tamblyn
Chairman
Australian Energy Market Commission
Level 5
201 Elizabeth Street
SYDNEY NSW 2000

Email: submissions@aemc.gov.au

Dear Dr Tamblyn

Rule Change Proposal - AMI (Victorian Jurisdictional Derogation)

ENERGEX Limited (ENERGEX) welcomes the opportunity to comment on the proposed change to the National Electricity Rules (NER) by way of jurisdictional derogation in connection with the rollout of advanced metering infrastructure (AMI) in Victoria. This submission is prepared by ENERGEX in its capacity as an electricity distribution network service provider (DNSP) in Queensland.

ENERGEX supports in principle, the proposed derogation for a DNSP led rollout of AMI in Victoria. In particular, ENERGEX supports the approach taken in the proposed derogation of establishing the DNSP's as the exclusive responsible party for AMI infrastructure, for the very reasons stated in the paper. However, ENERGEX has concerns that the jurisdiction-specific arrangements for Victoria have the potential to set a precedent or pre-empt the policy or regulatory framework for the national rollout of smart meters.

In particular, the systems and performance standards required to support the AMI project may have a disconnect with the systems required to support any future national framework for smart meters. In addition, ENERGEX would oppose any future extension of the derogation beyond its current proposed scope to customers who consume greater than 160MWh per annum.

Please do not hesitate to contact either myself or Rachel Leaver on (07) 3405 2924 should you wish to discuss this submission further.

Yours sincerely

A handwritten signature in black ink, appearing to read "Louise Dwyer".

Louise Dwyer
Group Manager Regulatory Affairs

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