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John Tamblyn
Chairman
Australian Energy Market Commission
Level 16, 1 Margaret Street
Sydney NSW 2000

By email: submissions@aemc.gov.au

National Electricity Law – Proposed Rule Change

AGL¹ welcomes the opportunity to provide comments to the Australian Energy Market Commission ("Commission") on the 'Draft Rule Determination – Draft National Electricity Amendment (Metrology) Rule 2006' ("Determination").

As outlined in our submission to the proposed rule change, AGL supports the move towards a national regulatory framework, and, to that extent welcomes rules and obligations that promote harmonisation of existing metering arrangements and support the work undertaken by NEMMCO to develop a single national metrology procedure for metering installation types 1 to 7.

In its determination the Commission has identified a number of issues raised by stakeholders that, in the Commission's view, are not within the direct scope of the National Electricity Market Management Company's ("NEMMCO") proposal. The issues that AGL raised in our response to the proposed rule change, which have been included in this category by the AEMC are:

• **Responsible Person**

- In addition to the Market Participant being able to elect to be the responsible person for metering types 1,2,3 and 4, AGL considers that where it is economically justifiable, Market Participants should be allowed to elect to be the responsible person for other metering types (types 5,6 and 7), subject to considerations on consequential sunk costs by the Local Network Service Providers; and
- At a minimum, AGL strongly recommends that innovative and advanced technology, such as prepayment meters are categorised separately to the existing metering types, and that market participants have the opportunity to elect to be the responsible person for such innovative and advanced metering technologies.

¹ AGL represents the retail businesses of AGL.

- **Inspection and Testing Requirements**

- Timeclocks attached to metering installations for controlled load supply arrangements should be subject to the same level of inspection and testing requirements as general metering installations.

The Commission has noted in its determination that since the concerns and recommendations raised by stakeholders are 'out of scope' they may refer them to the Ministerial Council on Energy ("MCE").

AGL strongly supports that the Commission raise these matters with the MCE, and looks forward to assisting the Commission and the MCE in any future consultations on addressing the issues raised by stakeholders on metrology in the national electricity market.

Please contact Carol Lydford, Manager Regulatory Development on 02-9921 2511 if you wish to discuss any aspect of our submission or require any additional information.

Yours Sincerely,

Sean Kelly

General Manager Energy Regulation

² National Electricity Code: Jurisdictional Chapter 9 Derogations.