Ref. CP

30 September 2010

Project Leader Australian Energy Market Commission PO Box A2449 Sydney South NSW 1235

Attention: Marc Tutaan

Email: www.aemc.gov.au

Dear Mr Tutaan



61 Mary Street Brisbane QLD 4000 PO Box 15107 City East QLD 4002 Phone 07 3228 8222 07 3228 8118

Website www.ergon.com.au

ERC0092 - National Electricity Amendment (Provision of Metering Data Services and Clarification of Existing Metrology Requirements) Rule 2010

We refer to the Australian Energy Market Commission's (AEMC) consultation on the Provision of Metering Data Services and Clarification of Existing Metrology Requirements.

Ergon Energy agrees in principle with the AEMC's proposals that:

- the Responsible Person (RP) should be responsible for the collection of metering data from each metering installation for which it is responsible, the processing of that data and the delivery of the processed data to the metering database; and
- there is a need to prescribe, in the Rules, the unique arrangements for selecting the Meter Data Provider (MDP) for metering installations that exhibit an unusual degree of complexity (complex connection points).

There remains a need however for AEMO to ensure that the RP's functions are consistently interpreted and applied across the market. This 'common understanding' of the RP's functions (relating to these changes) should be reflected in market procedures, following a process of review and consultation by AEMO.

Please do not hesitate to contact me on (07) 4121 9545 if you wish to discuss this submission.

Yours sincerely

Carmel Price

Group Manager Regulatory Affairs

C-A. Pina.

Telephone:

(07) 4121 9545

Email:

carmel.price@ergon.com.au