

Manningham City Council

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Dr John Tamblyn
Chairman
Australian Energy Markets Commission
Level 16, 1 Margaret Street
SYDNEY NSW 2000

Dear Dr Tamblyn

RE: Rule Change Proposal - Victorian Jurisdictional Derogation (AMI Roll Out)

I am writing with concern over proposed metering rule changes that will affect our residents' ability to choose a smart meter with communications accessibility.

Manningham City Council recently assisted 150 residents with the purchase of 1kW grid interactive solar PV systems. As a part of this process we wanted to make sure the meters that were installed would be capable of providing internet based access to energy data be able to be remotely read and be able to be changed to a gross meter if national laws came in at a later date.

To this end we were able to find a competitively priced smart meter at around \$250 fully installed with 'gross' metering capability for an additional \$70 and ongoing charges of only \$35 per annum. The provider of this smart meter was able to achieve all the above capabilities and have it installed now. One of the two electricity distributors in our municipality has advised that the communications element would cost \$700 per year on top of the meter price of \$131. This seems excessive and a problem in denying choice of metering provider when what is offered is the minimal capability. There are companies capable of providing true 'smart meter' equipment with the technical capacity that is needed when the Victorian Feed-In-tariff becomes active in April 2009 and which will require interval reads.

Although the meters offered by distributors will store the data at 15min intervals and for up to 207 days, the data is not readily available to the resident so they can change their behaviour to maximize the feed-in-tariff and thus reduce Co2 emissions.

The changing of meters does not occur with an independent meter provider being in the market as the meter does not need to be changed if a new electricity retailer is required.

We are of the view that the derogation as it stands provides a poor outcome for residents and will severely limit innovation and the opportunity for more resident participation in dealing with consumption of energy and ultimately, climate change.

Yours sincerely

LYDIA WILSON
Chief Executive