

Mr Christiaan Zuur  
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Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

*Submitted via [www.aemc.gov.au](http://www.aemc.gov.au)*

10 September 2015

Dear Mr Zuur,

### **Submission on the Multiple Trading Relationships (MTR) ERC0181**

EnerNOC is grateful for the opportunity to comment on this topic.

EnerNOC is a leading provider of Energy Intelligence Software (EIS) and services to utilities and enterprise customers. EnerNOC's EIS solutions for enterprise customers help inform energy purchase decisions, provide advanced visibility into electricity usage patterns, and optimise when it is used. These tools help them engage with demand response and demand management opportunities.

EnerNOC supports the introduction of Multiple Trading Relationships, as it will result in more vigorous competition around new products, services and customised retail offerings.

We believe that this specific item will complement the package of regulatory reforms being implemented as part of the Power of Choice review. The reforms will promote customer choice, unleash the latent potential for useful demand-side elasticity, and substantially increase competition, thereby improving the efficiency of market outcomes.

#### **1 Establishing a second connection point**

EnerNOC agrees with the position presented by AEMO, that there are significant costs and complexities associated with establishing a second connection point.

To establish a separate connection point requires dedicated wiring from the boundary, potentially bypassing all the other switchboards. This is particularly the case when specific devices are deep within the customer site. Examples include a pool pump, an air conditioner, or an EV charger.

An additional complexity is that an additional connection point will incur a second set of fixed network charges. In our experience working with customers in the NEM, many have undertaken a process to reduce fixed charges by consolidating NMIs.

## 2 **Desired metering configuration**

EnerNOC strongly supports the subtractive metering configuration. This configuration avoids much of the unnecessary wiring. In addition, the treatment of network tariffs is workable under this model.

The vastly reduced cost of this approach will continue to reduce as child meters become smaller and available at a lower cost. This would facilitate, and make it cost-effective to purchase an appliance that "comes with power". There is no possibility of doing this without MTR allowing for subtractive metering.

In contrast, the parallel metering model fails to address the problem that the MTR process was established to solve.

I would be happy to discuss these issues in more detail if that would be helpful.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Mottel Gestetner". The signature is fluid and cursive, with a large initial 'M' and 'G'.

Mottel Gestetner  
Senior Manager, Regulatory Affairs & Market Development