

To Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Response to AEMC Supplementary Report, Framework for Open Access and Common Communication Standards Review, dated 24 February 2014
Reference No. EMO0028

Dear Australian Energy Market Commissioner

The details in the Submission Response represent a personal view as a Consumer and metering systems specialist.

In reviewing the document there needs an improved focus on the benefits to the Electricity Consumer in both the quality and operating efficiency of service by Networks and others and that data is accessed at the fit for purpose and most cost effective access points:

- What is the best approach to benefit the electricity consumer and minimize total cost?
 - Technical data: The provision of technical data to Network as read from the meter by the MP (SMP) and should be provided to Networks as part of the data collected from the meter as a regulated requirement
 - Consumer data: As read revenue type data from the meter unvalidated for lowest cost especially for near real time provided by the MP or if market validated data required from the MDP or Retailer.
 - Assumes Smart Meter Management System is operated by the MP which provides data to the Network, DSM, and MDP who will further process for Retailers.
 - SMMS platforms support collection of all metering data including near real time web access and full automation.
 - The supply of technical data in addition to revenue data is minimal and low to no increase in communication costs for minor data volume variance.
 - Data access for meter data direct from the MP (SMP) will be lowest cost for the Network and Consumer.
 - Care needs to be taken in providing Network Technical Data and charging at a market price that the costs do not reduce the benefits or increase costs to the consumer with the value of Network efficiency being passed onto market profit of a service providers for just providing an operational gateway service.
 - The cost of billing could cost more than cost of providing the service or issues of data access agreement management variance makes network innovation too difficult.
 - Why should the Retailer get the Revenue Data supplied free of charge and the Network have to pay an additional market service fee to a profit centre

increasing the total costs to the consumer? What does the consumer want vs. the market participants?

- Ownership of the data whether the data is for technical or revenue use?
 - Will the data owner be the electricity consumer paying for the service, the MP (SMP) providing the service or the MC engaging the MP/MDP?
 - Ownership of the data should be the consumer and the benefits go to the consumer.
 - To reduce cost to consumers and administrative bureaucracy that the role of Metering Coordinator be incorporated into the role of the other market participants (MP/MDP).
 - Support Fig 2.2 where the Customer appoints the MC
- Competition
 - The MC roles should be the Network for a range of technical and operational cost reasons but if the market is to be competitive service focused the Independent third-party MC contracted by the customer is supported.
 - As there are large parts of Australia where the costs will likely mean access to the market is limited or non existent due to MP provision costs.
 - How is this to be addressed?
 - Will this fall to Networks or to a special third party to be the MP of last resort and how will they be compensated or will these consumers just not be able to participate in the market due to costs?

Thank you for the opportunity to make a submission and the consideration of this submission. Please contact me for clarifications.

Regards

Marcus Tyle
113 Cavendish Street
Nundah, 4012

(m): 0410686332

(e): mt017@optusnet.com.au