



19 September 2013

Ms Lisa Nardi  
Senior Advisor  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Dear Lisa

**National Electricity Amendment (Access to NMI Standing Data) Rule 2013**

Origin welcomes this opportunity to provide feedback on the Draft Rule Determination published by the Commission in relation to access to NMI Standing Data.

Origin supports the intent of the draft rule and the Commission's assessment of the benefits and costs of the change set out on page 37 of the draft determination. However we would draw the Commission's attention to the submission lodged on the draft rule by the Energy Retailer Association of Australia (ERAA).

In particular, there is some concern that the current drafting of proposed clause 8.6.2(b1) may restrict access to NMI standing data from those providing services to retailers and that extraction of data would need to be undertaken by retailers (as the registered participant) and then handing this data to third parties. Such an outcome would result in inefficient outcomes for industry and consumers and will increase costs.

We believe it is not the intention of the draft rule restrict service providers accessing NMI standing data on behalf of retailers in this way. To resolve any ambiguity, Origin supports the amended wording for proposed clause 8.6.2(b1) on page 2 of the ERAA submission.

Should you have any questions or comments in relation to this response, please contact me in the first instance.

Regards

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