

Ref: MR:JC:C615661

15 February 2008

RECEIVED  
20 FEB 2008

Dr John Tamblyn  
Chairman  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Dear Dr Tamblyn

National Electricity Amendment (Victorian Jurisdictional Derogation (Advanced metering Infrastructure Roll Out)) Rule 2007

Country Energy appreciates the opportunity to respond to the Victorian Minister for Energy and Resources request to make the proposed National electricity Amendment (Victorian Jurisdictional Derogation (Advanced Metering Infrastructure Roll Out)) Rule 2007.

Country Energy supports the proposal for Local Network Service Providers to act as the responsible person in respect of Advanced Metering Infrastructure (AMI) rolled out to small customers and considers that this position should also be reflected in proposed national smart meter rollout arrangements.

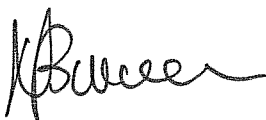
Country Energy believes it is necessary to consider the impact of this derogation on the NEMMCO Metrology Programme, particularly the harmonisation of the national metrology arrangements and the establishment of consistent obligations and technical requirements across both first and second tier metering installations. Country Energy requests that the ongoing separation of Victoria from any proposed national framework be carefully considered.

The national program for the roll out of smart meters is also an important consideration. The MCE has been working on this project in consultation with industry, with the results of the cost benefit analysis to be released for consultation at the end of February 2008. Depending on the results of the cost benefit analysis a national roll out of smart meters may be implemented through a national approach. Country Energy believes that if a national roll out of AMI is mandated, flexibility is required to ensure Victoria is able to be aligned to this national approach, rather than the national approach being aligned to Victorian requirements.

Country Energy recognises the current legislative and regulatory arrangements for the AMI rollout in Victoria and believes that any additional instruments that are established should provide the opportunity for integration within the future national framework.

Country Energy would be pleased to discuss the matters raised in this submission with the AEMC. If you require further information or clarification in relation to this submission please feel free to contact Debbie Voltz on 02 6589 8145 or Maree Richards on 02 6338 3953.

Yours sincerely



Natalie Banicevic  
General Manager Regulatory Affairs