



ACTIVESTREAM

20 May 2016

Mr Richard Owens
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Lodged online: www.aemc.com.au

Dear Mr Owens,

RE: Updating the Electricity B2B Framework – Draft Rule Determination
(Reference: ERC0197)

Active Stream Pty Ltd (**Active Stream**) welcomes the opportunity to provide a submission to the Australian Energy Market Commission (**AEMC**) in response to the Draft Rule Determination on Updating the Electricity B2B Framework rule (**the Draft Rule Determination**).

Active Stream is an accredited Meter Provider and Meter Data Provider, which delivers digital meters and data services to energy retailers, distributors, and other businesses in the National Electricity Market (NEM). Established in 2014, Active Stream is a wholly-owned subsidiary of AGL Energy Limited. Our digital metering solutions enable businesses to fully realise the benefits of advanced metering technology to deliver their services more efficiently and offer innovative products which better meet the needs of current and future energy consumers.

As a metering services provider operating in the NEM, we support the approach of an industry-led governance committee and welcome the opportunity to have metering service businesses represented on the new Information Exchange Committee (IEC).

Active Stream also supports the majority of draft decisions captured by the Draft Rule Determination, including in particular:

- limiting the ability of AEMO to reject B2B procedural decisions proposed by the IEC;
- revision of IEC membership obligations to take into account the NEO in its deliberations; and
- the cost recovery model.

However, we are unsure if one representative seat can effectively cover off the interests of three independently accredited market roles. Active Stream believes that at least two ordinary seats on the IEC for metering parties is necessary. This will provide suitable coverage for parties operating in the market as Meter Providers and Metering Data Providers, and more importantly potentially provide (where the metering services membership class sees benefit in having) a dedicated voice to Metering Coordinators.

Although not included in the Draft Rule Determination, Active Stream believes that the review mechanism built into the Competition in Metering and Related Services rule (**the metering rule**) should be used by the AEMC to determine if the new IEC membership

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and governance, B2B procedural making process, and the broader B2B framework is working efficiently.

With respect to the implementation timetable, Active Stream shares broad industry concerns that any further delays, including those recently advised by AEMO on the creation of the transitional IEC committee, will have significant impacts on a market-led rollout of digital meters and its associated B2B communications. We point out that there are already parties in the market rolling out digital meters, including our business, and therefore any slip in the effective date of the metering rule will impact customers and the market.

Active Stream supports the transitional arrangements set out in the Draft Rule Determination dependent on a couple of key points:

- AEMO must appoint the new IEC immediately, but no later than one month after the AEMC publishes its final rule determination;
- AEMO and the IEC must finalise all governance arrangements within one month to ensure sufficient focus the on B2B updates necessary to give effect to the metering rule; and
- the IEC on its inception, must be allowed to promptly commence development and finalisation of priority B2B procedures necessary to give effect to the metering rule on 1 December 2017. These procedures must be published by AEMO as soon as practical but no later than one month from the receipt date;

If you would like further details or clarification on our views, please don't hesitate to contact me on JRClark@activestream.com.au.

Yours sincerely,

Jason Clark
General Manager – Active Stream