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**Proposed Amendments to the National Electricity Law
Exposure Draft in relation to Smart Meters**

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Jemena Electricity Networks (Vic) Ltd (JEN) welcomes the opportunity to provide comments to the Ministerial Council of Energy (MCE) on the Exposure Draft of the proposed amendments to the National Electricity Law (NEL) and the accompanying explanatory note for smart meter roll-outs and trials.

JEN has been actively involved in the development of the National Stakeholder Steering Committee (NSSC) and the Energy Networks Associations (ENA) submissions and strongly endorses in these submissions.

We support the three key concerns expressed in the NSSC response:

- The lack of transparency in the making of Ministerial determinations for both trials and roll-out and the ability of a jurisdiction to vary from the national arrangements
- The nature and breadth of the powers that may be conferred on the AER in relation to trials
- The proposed cost recovery mechanisms, including the fit with the overall national metering framework

We support the NSSC recommendation that the NEL provisions relating to the rollout be deferred; only the trials provision should be progressed at this time. This allows the NSSC consultative framework to develop an integrated set of proposals for the metering functionality, performance and services, including the metering framework and cost recovery arrangements for the roll out. Consistency and clarity of roles and obligations across the Law, Rules, Procedures and Service Level hierarchy of electricity documentation will benefit industry.

Should you have any questions in relation to the above, please feel free to contact me on (02) 9270 4512.

Yours sincerely

A handwritten signature in cursive script that reads "Sandra Gamble".

Sandra Gamble
Group Manager Regulatory