



**UNITED ENERGY
Distribution**

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Proposed Amendments to the National Electricity Law in relation to Smart Meters

United Energy Distribution (UED) appreciates the opportunity to comment on the proposed National Electricity Law (NEL) amendments and the accompanying explanatory note for smart meter roll-outs and trials.

UED has been involved in the development of the National Stakeholder Steering Committee (NSSC) and the Energy Networks Associations (ENA) submissions and supports the concerns and recommendations in these submissions.

The MCE statement of policy principles stated that a national regulatory framework for smart metering should be established. Whilst we recognise that the Victorian smart meter roll out and framework has progressed and will be exempt from this set of NEL provisions, we are concerned by the extent of powers provided to a jurisdiction to vary the smart metering functionality, infrastructure and service levels from a nationally agreed standard.

To progress the MCE smart metering policy the NSSC was established to develop the smart metering standards, smart metering services, metering framework and cost recovery arrangements for any jurisdictions wishing to proceed with a smart meter roll out. The NSSC is an expert representative body which is well placed to develop the Rules proposal needed to ensure a workable framework across the NEL, Rules and Procedures.

UED supports the NSSC's recommendation to defer the provisions relating to the longer term, mandated roll out in order to allow time for consideration of all aspects by the NSSC.

We are supportive of the elements relating to trials and pilots, including the cost recovery for this work to proceed in a workable, robust manner in order that roll out decisions in other jurisdictions are able to be better informed. The refinements presented in the NSSC response allow the relevant operator to develop a trials proposal for review by retailers and consumer groups and approval by the Minister.

Should you have any questions in relation to the above, please feel free to contact Verity Watson ph (03) 8544 9447.

Yours sincerely



Hugh Gleeson
Chief Executive Officer