

12 December 2018

Australian Energy Market Operator
20 Bond St
Sydney
NSW 2000

Re: Metering Procedure Changes - Package1

Thank you for allowing Landis+Gyr the opportunity to provide feedback on the proposed changes to the Metering Procedures.

Landis+Gyr is the leading global provider of integrated energy management solutions for the utility sector for close to 120 years and one of the largest suppliers of electricity and gas meters in Australia.

We would like to bring to your attention, a necessary amendment required to **Metrology Procedure Part A clause 3.2, section C** to support 5-minute Load Profile (LP) intervals.

3.2 Use of Optical Ports and Pulse Outputs

(C) *A type 4A or 5 metering installation must have an optical port that meets the AS 1284.10.2 or AS 62056.21 or a computer serial port to facilitate downloading of 90 days of interval energy data for each meter associated with the metering installation in 35 seconds or less.*

Landis+Gyr wishes to point out if more data is required to be stored locally then the time required for it to be downloaded is directly proportional. The amount of data derives from the number of channels required and the interval length. The type of metering application dictates the required number of LP channels.

On the other hand, the optical speed is determined by the ANSI / IEC Optical Port Standard design which is currently used by all manufacturers. The software used to download the data via the optical port can be configured to communicate at variety of Baud rates, ranging from 9600 to 38400 (Bits per second).

This means the requirements outlined in Metrology Procedure Part A clause 3.2, section C, are incompatible with the industry standard optical port and the meter data storage requirements. Landis+Gyr would also like to note that it would not be feasible to change the industry standard optical port performance.

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Based on the above reasons, we recommend the following changes to the **Metrology Procedure Part A clause 3.2, section C:**

3.2 Use of Optical Ports and Pulse Outputs

(C) A type 4A or 5 metering installation must have an optical port that meets the AS 1284.10.2 or AS 62056.21 or a computer serial port to facilitate downloading of 90 days of interval energy data per Load Profile Channel in 90 seconds or less.

Landis+Gyr wishes to thank the AEMO for the opportunity to make this recommendation. We remain available for further comment and welcome future discussions through a one-on-one meeting with the AEMO.

Yours sincerely,



Jason Pereira
Landis+Gyr's PWG Representative.