Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Reference: EMO0028

Re: Feedback on "Framework for Open Access and Common Communication Standards Review"

We are writing in response to AEMC's request for stakeholder feedback on the draft report 19 December 2013 "Framework for Open Access and Common Communication Standards Review".

As a provider of Smart Grid solutions to the utilities industry, Freestyle Technology evaluates, engages, and implements intelligent devices communicating with multiple meter vendor products.

We offer some high-level comments with regard to the Smart Grid relative to the broader Internet of Things (IoT) which is proposed to provide utilities and consumers with the benefits enabled by connection of devices beyond basic metering.

5.3.4 Areas for comment

- should an internationally accepted meter protocol form the foundation of the NEM common market protocol?

>> An internationally accepted common information model based standard should be utilised as the foundation.

- is DLMS/COSEM sufficiently well developed to be used as the foundation for a market protocol, given the potentially synergies that exist with smart grid interoperability and other meter standards?

>> There are far better suited options that can accommodate the additional feature and functionality requirements of a smart grid which supports devices and applications which utilise metering as one device within a connected ecosystem. DLMS/COSEM, although standardised for basic metering applications, do not lend themselves to the flexibility provided by other options such as Web Services which enables integration with business/operating support systems.

- would extensions to the B2B gateway present a viable option for the development of a services based common market protocol?

>> The new functionality required to support services which enable suppliers to differentiate their products would be restricted by the basic functionality provided by the B2B gateway. Having to implement extensions would be time consuming and limit the opportunity to compete based on features offered.

5.4.2 Adding new functions to the common market protocol

- would requiring new functions to be fully documented before they are used stifle innovation and reduce competition in the provision of DSP and related services?

>> Differentiation in a competitive market is facilitated through innovation. Adding new functions to the common market protocol through an extended implementation cycle would stifle innovation as it would significantly reduce the "first to market" opportunities for a particular stakeholder.

- would not requiring new function to be documented be likely to lead to reduced levels of interoperability, and hence reduce competition in the provision of DSP and related services in the longer term?

>> Interoperability should be supported by the regulation of a specified base set of functions which are fully documented and maintained. Extended functionality beyond this base set would drive innovation and competition. As extended functions are adopted by the wider market, these can be considered for inclusion into the base set.

5.5 Common meter protocol

- should there be a common meter protocol?

>> No

- if a common meter protocol is required, should it use the internationally accepted DLMS/COSEM protocol as its foundation?

>> No, DLMS/COSEM is a connection oriented protocol which by definition requires establishment of a connection, transfer of data, and release of the connection. This constrains the system as it limits the capability to scale up the number of meter/device connections as the network must maintain the connection whilst the meter/device processes the request and then responds. This is a significant issue for systems incorporating "sleepy devices/meters" that may take substantial time before responding.

- without a common meter protocol do proprietary meter protocols (and protocol translations) be more likely to support competition in DSP and related services?

>> Yes

5.6.4 Proposed smart meter communication architecture

… should the proposed architecture of …

- a protocol translation at the point of entry (Fig 5.1) be supported in the NEM?

>> Yes, this will provide the greatest flexibility to enable future integration of services for customers to achieve the benefits of contestability under the Power of Choice.

- A common meter and market protocol (Fig 5.2) be supported in the NEM?

>> No, this limits the capacity to implement innovation and differentiation into the market.

6.1 Whether to regulate rights of access

- Whether the right of access to smart meters should be enforced under the NER and, if so, to what degree (e.g. should right of access apply to all smart meter functions or in relation to providing certain services);

>> The architecture should include the capability to assign rights of access based on individual meter functions for each individual meter.

6.4 Consumer protection requirements

>> Protection of consumer information must be maintained within all domains of the architecture. Secure communications between the meter and the network, within the network, and at the market point of access must be ensured such that only certified/approved parties can access the specific information that they have been allocated access to.

In conclusion, we commend the AEMC for its proactive efforts in addressing the challenges pertaining to the advancements in smart metering technologies and for the opportunity to provide feedback on this effort.

If you have any questions regarding this letter and the submitted comments please contact Richard Strickland, Director of Products and Innovation, Freestyle Technology (richard.strickland@freestyletechnology.com.au; 03 8540 0955).

Sincerley,

Freestyle Technology

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