METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *AGL*

Completion Date: *4 Nov 2016*

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1. General Comments

Please note that the spelling error for Participant has been left in multiple templates;

The tables do not lend themselves to providing additional or general comments associated with the whole procedure

Please note that additional comments have been provided for the glossary – these have been highlighted.

AGL notes that in many of the lists of criteria which are expected to be individual criteria, the word ***and*** has been used between criteria (indicating that both criteria should be met) rather than the word ***or***, indicating that any of the criteria should be met. Also, the introductory sentences preceding these lists are not clear in defining that any of the criteria are a trigger. See SLP ENM – clauses 3.3.2, 3.3.3 and 3.5 as examples. As such, AGL strongly recommends that these lists be reviewed and amended appropriately to ensure clarity of the operation of the criteria.

2. Glossary and Framework

Please delete any rows where there are no participant comments

(note: only sections that have changed as part of Work package 2 are listed in the table below)

Commented [MR1]: This spelling error has been left in multiple templates

Clause	Heading	Participant Comments AGL – Glossary & Framework
1.2	Definitions and Interpretation	With the inclusion of B2B procedures, the terms and definitions may now also relate or be defined by the NERR, not just the NER, with a similar hierarchy 1.2.2(c) is EST 'Australian' EST ` Note changes required for B2B – there are times and periods in the B2B procedures which are in local time not AEST Use of calendar and business days. Clarity is needed in the glossary and procedures about whether days are business days or calendar days. In general it would be better for periods to be business days unless there is a particular reason. For instance, the application procedure requires an application 30 days prior.. which indicates calendar not business days.
1.3	Related AEMO Documents	
2.2	Structure of Retail Electricity Market Procedures	

Clause	Heading	Participant Comments AGL – Glossary & Framework
2.3	Metrology Procedure	
2.4	B2B Procedures	The list of B2B procedures and documents should be reviewed following the B2B consultation
2.5.5	NMI Procedure	
2.7	Qualification Procedure	
2.8	Metering Service Level Procedures	
2.9	Service Level Procedure for Embedded Network Managers	
2.10	Default & Deregistration Procedure	
2.11	Exemptions	
3	Glossary Term: Default and Deregistration Procedure	
3	Glossary Term: Exemption Guideline	
3	Glossary Term: Exemption Procedure	

Clause	Heading	Participant Comments AGL – Glossary & Framework
3	Glossary Term: HV	Note reference to Low Voltage as being < 1000v Australian Standard uses voltages > 1000v Suggest change definition to the following, including spelling out what HV is : *High Voltage – A voltage greater than 1000v*
3	Glossary Term: LV	Suggest change definition to the following – including spelling out what LV is *Low Voltage – a voltage equal to or less than 1000 v*
3	Glossary Term: MDM Contributory Suffix	
3	Glossary Term: Meter Register Status Code	We note the term, however, the definitions contained within 4.11.3 (table 4-j) of the MSATS procedures CATS does not cater for a type 4A meter which has the contactors manually opened – not remotely opened.
3	Glossary Term: MSATS Procedures	Suggest re-wording to *The various procedures specifying the operation of the MSATS systems, including…… or* *The various procedures specifying the operation of the MSATS systems, published by AEMO from time to time.*
3	Glossary Term: NMI Procedure	

Clause	Heading	Participant Comments AGL – Glossary & Framework
3	Glossary Term: Qualification Procedure	
3	Glossary Term: Service Level Procedure (ENM)	
3	Glossary Term: Unmetered Load Guideline	

3. Default & Deregistration Procedure (MP, MDP, ENM, MC)

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
1	Introduction	
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	BREACH OF THE NER OR PROCEDURES UNDER THE NER	
3	DETERMINATION OF TYPE OF BREACH	AGL seeks greater understanding of the levels of impact for an: • Immaterial • Significant • Material Breach The procedure provides no guidance on how AEMO or a participant would assess what constitutes a non-material breach through to a material breach. There is no gauge on cost of service, number of customers impacted, cost to affected participant etc. AGL believes that an impact table – much like the ones used for risk consequence assessment which would provide a clear and common understanding of breach levels for all parties and avoid any consideration of bias or inconsistent application by AEMO

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
		or the Auditor. The table/criteria could indicate • Number of customers / load affected • Cost to affected participants • Impact on Customers • Impact on wholesale market • Impact on customer billing etc. ** add HV comments re 7..**** As a matter of general comment, AGL would consider that the hierarchy would be better described as (noting the current rule requirements) • Immaterial • Material • Significant AGL suggests that this complete process be reviewed by the AEMO Market Auditors as the application of this procedure will undoubtedly be audited and scrutinised. It needs to be clarified at what stage AEMO determines the type of breach committed. Is this an upfront process or is this as per section 6, after the conclusion of the review?

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
3.1	Immaterial Breach	This section discussed the impact of a breach, but does not specify the framework for assessing how other participants' obligations may be affected. While this process is created under the NER a number of Participant obligations affecting their service and which will stem from this breach arise from the NERR (or Victorian Code for Vic). AGL seeks clarity on whether the subsequent impact of a breach on NERR (or Victorian Code) obligations would also be considered in this assessment. AGL notes the issue of the use of ***and*** rather than ***or*** in the criteria lists in this section
3.2	Significant Breach	This section discussed the impact of a breach, but does not specify the framework for assessing how other participants' obligations may be affected. While this process is created under the NER a number of Participant obligations affecting their service and which will stem from this breach arise from the NERR (or Victorian Code for Vic). AGL seeks clarity on whether the subsequent impact of a breach on NERR (or Victorian Code) obligations would also be considered in this assessment. AGL notes the issue of the use of ***and*** rather than ***or*** in the criteria lists in this section

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
3.3	Material Breach	This section discussed the impact of a breach, but does not specify the framework for assessing how other participants' obligations may be affected. While this process is created under the NER a number of Participant obligations affecting their service and which will stem from this breach arise from the NERR (or Victorian Code for Vic). AGL seeks clarity on whether the subsequent impact of a breach on NERR (or Victorian Code) obligations would also be considered in this assessment. AGL notes the issue of the use of ***and*** rather than ***or*** in the criteria lists in this section.

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
4	ISSUE OF BREACH NOTICE	The procedure is unclear in regards to the issuance of a material / significant breach notice. As a matter of course, the contracting parties should also be advised of a breach so as to mitigate any impact to their operations. That's is, if an MP/MDP is breaching materially or significantly, then the MC should be advised. If an MC is breaching materially or significantly, then the retailer (and large customers) and affected network should also be advised. If an ENM is breaching materially or significantly, then the ENOs and affected retailers (child and parent) and network should also be advised. Further, where the AEMO becomes aware of a breach through an affected party raising the issue, then AEMO should ensure that party is informed of AEMO's subsequent actions. As with all notices that are sent out; The notice to affected parties needs to indicate to which contact at the affected party the communication will be sent in the breach notice to ensure appropriate communication between participants. In Particular it is noted that the Local Retailer (LR) is not identified as a party to be notified in this procedure. See 8.1

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
5	REVIEW OF CAPABILITY FOR ONGOING COMPLIANCE	Consider redrafting this clause. The drafting of the procedure requires a breach to be remedied within 7 days of the notice being issued, but then allows for a remediation plan to be considered. It would seem more appropriate for the 7 days to be a trigger for the remediation of the issue **or** development and acceptance of a remediation plan. It would be more appropriate to have the time periods specified in business days – so the 7 days should be 5 business days to ensure continuity across procedures. Also, there should be different SLAs for non-material and material breaches.in particular with rectification mass market and large customers. Further, if the breach requires access to customer metering installations there may be a requirement for outage notifications to be issued to customers which require 4 days **business** notice to the customer.
5.1	Remediation Plan	The remediation plan has no reference to the contracted or affected parties – simply AEMO. We do not consider that appropriate for the following reason. Contracted and impacted parties (i.e. MC, retailer, network ENO etc) should be aware and agree any remediation plan as they may have to assist the affected parties (e.g. customer de-energisations to undertake physical work, customer notices for rebilling etc.) and be a party to the remediation reporting. AGL also believes that the relevant AEMO auditor should be involved in this process and monitor the breaching remedial plan as well as the implementation of any process changes to remove the cause of the breach and provide a final report on the implementation.

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
5.2	Past Conduct	The term warning, nor the levels of warning, have not been previously introduced in this document or defined. NER Clause 7.4.4 (b)(3) states: *the levels of a breach with severity below a material breach are to be treated as warnings with different levels of magnitude.* AGL suggests that more clarity around the levels of warning and how they relate to non-material and significant breaches is needed in the procedure.
5.3	Organisation Structure	
5.4	Other Relevant Considerations	
6	AEMO ACTION FOLLOWING REVIEW	Clause indicates that no breach notice will be issued until the review is completed and breach rectified. This contradicts previous statements regarding remediation plan and issue of notice.

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
6.1	Material Breach	This section considers deregistration of an MP/MDP or issuing of a default notice to an MC. In the case of deregistration of an MP/MDP it is unclear how the market will operate appropriately if a service provider with many thousands of sites ceases to operate. This event will affect AEMO wholesale settlements, network billing and customer billing which will impact all market participants, not just the affected ones. In the case of a business undertaking both the MP/MDP business as well as the MC business, deregistration or default of either function must undoubtedly affect the other functions. AGL suggests that the current proposed process as described may be inadequate and suggests that further discussion with industry is required to consider these impacts. The market has already undergone three RoLR events and a failure of a metering business across the mass market would have substantial financial consequences for all participants as well as the integrity of the market. Further, AGL believes that AEMO procedure should be clearly written to not ***determine*** that a breach has occurred, but ***demonstrate*** that a breach has occurred as required by NER 7.4.4 (b)(2) which states that the: *deregistration of a MDP/MP can only occur if it can be **demonstrated** that the provider has committed a material breech.*
6.1.1	MP, MDP, or ENM	
6.1.2	MC	
6.2	Non-Material Breach	

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
6.2.1	Actions taken by AEMO	
6.2.2	Warnings	
6.2.3	Escalation	
7	EXERCISE OF AEMO DISCRETION	AGL considers that the actions which AEMO can take and the degree of discretion which AEMO has to assess and evaluate information in determining the level of breach are too ambiguous. In much the same way as the definition of the breach levels, AGL would like to see much clearer guidelines on the actions which would be taken for each level of breach.
7.1	Relevant Considerations	Cl 6.2 relates to non-material matter and cl 6.1 relates to non-material breaches. The actions that AEMO are reasonably able to take for these different levels of breach are substantially different. AGL suggests that this clause be re-written to cover non-material / significant breaches – which are warning level only - and have a separate clause to deal with material breaches, which could lead to de-registration.
7.2	Constraints	
8	CONSEQUENCES OF AEMO ACTION	Throughout this section, the procedure specifies the breach notices being issued to the breaching party. In the case of a material or substantial breach, AGL believes that the contracting and affected parties (Retailer, LR, Parent Retailer, Network, ENO, Large customer etc.) should also receive a copy of the breach Notice. This is important so that the impacted parties can ensure that the breaches are dealt with from their perspective and the impact to their businesses and customers is minimised.

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
8.1	MP, MDP or ENM	
8.1.1	Material Breach	There is no reference to Local Retailers (LR) being advised. This party is also impacted by these types of breach.
8.1.2	Non-Material Breach	
8.2	MC	
8.3	Other Impacts	
9	VOLUNTARY DEREGISTRATION	AGL notes that this section does not allow for a voluntary deregistration of an MC, MP, MDP. These parties may be purchased or merge with other parties and would reasonably seek to deregister their participant ID or simply seek to leave the market. AGL seeks clarification from AEMO as to why this has not been allowed for in the procedures and suggest that these scenarios be catered for. AGL also suggests that AEMO must issue notices to all relevant parties in regards to a request (voluntary) for de-registration, not just in the cases of a forced re-registration.
9.1	Application	AGL notes that this process is incomplete in terms of which parties may deregister and processes to ensure market continuity.
9.1.1	Embedded Network Manager	

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
9.1.2	Metering Providers and Metering Data Providers	All parties should be referred to AEMO registration desk for de-registration, since there are likely to be flow on effects across the market. AGL refers to NER Cl 7.4.4 Deregistration of Metering Providers, Metering Data Providers and Embedded Network Managers. While the principles relating to a breach need to be incorporated, the NER does not specify that a voluntary deregistration is not available and that these procedures should cater appropriately for that requirement.
9.1.3	Metering Coordinators	
9.2	Process	The process seems unduly inconsistent between parties seeking deregistration. AGL suggests that the process should be coordinated through the AEMO registration desk and be consistent for all parties.
9.2.1	All Applicants	Note – this clause does not reference the AEMO registration desk, which would be a more appropriate contact point.
9.2.2	Embedded Network Managers	

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
9.2.3	AEMO Review of Application	Again AGL queries why there is a particular emphasis on the functions of an ENM in a deregistration process but not of the MC/MP/MDP. An ENM deregistration is no different to an ENM terminating its contract with an ENO, who is responsible for appointing another ENM and ensuring handover. The market should be more concerned about the provision of metering services than ENM services. AGL is unclear why there are particular conditions placed upon an EMN de-registering, given that the obligation to appoint the ENM sits with the ENO to ensure those aspects are managed. Since an ENM is not likely to have an ongoing daily operational role the changeover is unlikely to have a substantial impact on market operations. However, there are substantial operational issues associated with the changeover of an MC/MP/MDP and these should be contemplated in the conditions of deregistration. Therefore it is more important to ensure that there are obligations on MCs, MPs and MDPs to ensure that service is continued through their process for deregistration as they do have ongoing daily operational roles.

Clause	Heading	Participant Comments AGL – Default & De-Registration Procedure
APPENDIX A	NOTICE OF BREACH	As a general comment: 1. The notices should also list who has received copies of the notice; 2. The notices could be simplified substantially by identifying the breaching party once on the notice and referring to them as 'the party' throughout the notice; 3. Beach notices should be uniquely identified; 4. Applicable market Participant ID s should be clearly stated.
APPENDIX B	METERING COORDINATOR DEFAULT NOTICE	Reference unique breach identifier Communication must include addressee's applicable participant ID(s)
APPENDIX C	NOTICE TO APPOINTERS	Reference unique breach identifier Communication must include addressee's applicable participant ID(s)
APPENDIX D	OUTCOME OF REVIEW	Reference unique breach identifier Communication must include addressee's applicable participant ID(s)
APPENDIX E	NOTICE TO AFFECTED PARTIES	Reference unique breach identifier Communication must include addressee's applicable participant ID(s)

4. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments AGL – Exemption Procedure

Clause	Heading	Participant Comments AGL – Exemption Procedure
	General issue with procedure	This procedure and the MDP SLP are inconsistent with the NER obligations, which state that NER 7.8.10(d): the *Metering Coordinator* must in respect of a *connection point* with: (1) a type 1, 2 or 3 *metering installation*, if a *metering installation malfunction* occurs to the *metering installation*, cause repairs to be made to it as soon as practicable but no later than 2 *business days* after the *Metering Coordinator* has been notified of the *metering installation malfunction*; or (2) a *metering installation* other than the installations referred to in subparagraph (1), if a *metering installation malfunction* occurs to the *metering installation*, cause repairs to be made to it as soon as practicable but no later than 10 *business days* after the *Metering Coordinator* has been notified of the *metering installation malfunction*. The overall AEMO procedures as described, when applied to the mass market, are unclear in the necessary process for identification of fault, rectification of fault and notice of fault to the MC and application for exemption. Further, it is likely that most meter faults in the mass market will be resolved by changing the meter, which will require an interruption notice to be issued to a customer, which will not be achievable within 10 business days. The number of faults, reporting of faults and requests for exemptions using the current processes are likely to inefficient and generate a lot of unnecessary additional work and requests for exemptions. A likely timeline for the identification of a fault, request for a service order from the retailer and issuing of an outage notice to the customer will take longer than 10 days. The result is that almost every mass market fault will have an exemption notice submitted prior to the end of the 10 day period. AGL suggests that both this procedure, the MDP SLP and the relevant Rules need review to ensure a more consistent and efficient process for the management of mass market meter faults.

Clause	Heading	Participant Comments AGL – Exemption Procedure
1	INTRODUCTION	While AGL agrees that the current MC should be responsible for submitting and managing any applications and providing updates, AGL believes that the exemption should sit with the MP/MDP at the metering installation. It is quite possible for an MC to be churned during an exemption rectification process and it seems unnecessarily inefficient to require a new MC to commence making an application for a known issue which has already been submitted (and likely approved) for consideration. The concept that the MC and MP/MDP are linked at all times is an outmoded concept in the framework of metering competition where there will be multiple commercial arrangements which will move around frequently. The NER requires the MC to obtain an exemption (7.8.10) but later requires the Metering Provider (7.8.20(c)) to provide the rectification plan. The Rule does not state that the exemption is issued to the Metering coordinator but rather must be obtained by the MC. Therefore, AGL believes that the procedure can allocate the exemption to the MP.

Clause	Heading	Participant Comments AGL – Exemption Procedure
1.1	Purpose and Scope	The existence of a metering installation malfunction should be discoverable and available to the related parties at a site (MC, MP, MDP, FRMP, host retailer and LNSP) as well as any being discoverable to any prospective MC or Retailer, as this could impact any proposed provision of service to the customer. AGL queries why the procedure describes the MC as the 'Current MC'. By definition the MC is 'the current MC'. Further, it is unclear if this procedure is to be used for application for type 4a communications exemptions. As the current definition of Metering Installation Malfunction includes issues related to data collection and no other procedure has been published, is Type 4a is covered by this procedure? If so, there should be further clarity to this procedure. If not, an exclusions sections should be added to clearly indicate that exemption for Type 4a related issues are not included and a separate process is to be followed.
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	APPLICATION PROCESS	AGL queries why the procedure describes the MC as the 'Current MC'. By definition the MC is 'the current MC'.

Clause	Heading	Participant Comments AGL – Exemption Procedure
2.1	Applicant	AGL disagrees with the statement that the MC is the only beneficiary of an exemption. The exemption provides some relief from meeting the NER obligations in respect to repairing a metering installation or process. The exemption by definition grants the Meter Provider and the Meter Data Provider an exemption from meeting market and contractual obligations while the issue is being rectified. A change of MC does not necessarily lead to a change of MP/MDP, particularly in the case of a FRMP churn. Therefore the exemption should be related to the MP on site.
2.2	Timing of Application	
2.3	AEMO's Determination	
2.4	Matters taken into Consideration	This should also indicate that no unsuccessful previous exemption application will be taken as a binding precedent. Each application must be assessed individually on its own merits.

Clause	Heading	Participant Comments AGL – Exemption Procedure
2.5	Grant of Exemption	AGL believes that these clauses (a) to (c) are incorrect in as much as the NER (Cl 7.8.10(c)) requires the Metering Provider, not the MC, to provide a rectification plan to AEMO: (c) If an exemption is provided by *AEMO* under this clause 7.8.10 then the *Metering Provider* must provide *AEMO* with a plan for the rectification of the *metering installation*. Again, AGL believes that this NER clause makes it clear that the exemption is associated with the Metering Provider and not the MC.
2.6	Application Unsuccessful	Clause 2.6 indicates that an application may be rejected if sufficient information is not provided in the application, however, clause 2.3 indicates that AEMO may request additional information. It seems inconsistent to suggest that an application may be rejected for insufficient information. Rather, it seems that the application may be rejected if the appropriate criteria are not met or information is not provided after a request. Again, noting clause NER 7.8.10(c), AGL believes that this clause 2.7 and clauses 2.8 and 2.9 need revision. AGL believes that the MC should monitor and manage the MP in making rectification, but the obligation and responsibility lies with the MP. Also, AGL seeks clarity from AEMO on what would **NOT** constitute a metering installation malfunction.

Clause	Heading	Participant Comments AGL – Exemption Procedure
2.7	Extension to Exemption	Again, noting clause NER 7.8.10(c), AGL believes that this clause 2.7 and clauses 2.8 and 2.9 need revision. AGL believes that the MC should monitor and manage the MP in making rectification, but the obligation and responsibility lies with the MP. AGL also notes that there is no obligation to ensure affected parties, in particular those not contracted to the MC, but which are financially affected, be kept informed of the situation.
2.8	Current MC's Obligations during the Exemption Period	Again, noting clause NER 7.8.10(c), AGL believes that this clause 2.7 and clauses 2.8 and 2.9 need revision. AGL believes that the MC should monitor and manage the MP in making rectification, but the obligation and responsibility lies with the MP. AGL also notes that there is no obligation to ensure affected parties, in particular those not contracted to the MC, be kept informed of the situation.

Clause	Heading	Participant Comments AGL – Exemption Procedure
2.9	Expiry of Exemption	Why does the exemption not cease when the faulty metering component or metering installations is replaced, as well as rectified. AGL again notes that the change of MC (without a change of MP or metering installation) should not void the exemption. Further, the list of possible reasons for expiration should be reviewed and the introductory sentence clarify than any criteria will trigger the expiry of the exemption. The use of 'and' between (c) and (d) implies that both criteria must be met. AGL understand the list of reasons are individual, rather than linked, so the word ***and*** should be replaced by ***or*** . Again AGL notes that it does not believe that the MC is the owner of the exemption but rather the MP is.
3	RECTIFICATION PLAN	
3.1	Timing	
3.2	Contents	It is noted within this section that a shutdown may be required to rectify a metering installation. Depending on the customer requirements, it may not be possible to schedule a shutdown for a period, and in the case of small customers, without 4 b/days' notice, unless by agreement. As such, it is quite possible that any rectification plan may initially be high level and refined after assessment of the issue contact with the customer. This should be allowed for in the process.
APPENDIX A	APPLICATION FOR EXEMPTION	

Clause	Heading	Participant Comments AGL – Exemption Procedure
APPENDIX B	APPLICATION FOR EXTENSION	

5. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments AGL – National Metering Identifier
		EN NMIs retained when the site moves back and forth from the market Continuing with the NMI in every case Not extinguish in every case What obligation on ENO if the NMI is live
1	INTRODUCTION	
1.1	Purpose and Scope	The NMI also provides the link to the relevant participants who have responsibilities at that connection point. It is about both data and roles and responsibilities.
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	ALLOCATION AND ISSUE OF NMIS	
2.1	NMI Allocation by AEMO	Clause (d) needs update. NEMMCO agreed with VENCorp that NMIs in the range starting 5 were allocated to for the gas market. AEMO is now responsible for issuing both NMIs and MIRN blocks and therefore has responsibility for all allocations. Therefore suggest delete everything starting with *To avoid….*

Clause	Heading	Participant Comments AGL – National Metering Identifier
2.2	Issue of NMIs by LNSPs and ENMs	Clause (ii) grammar Apply to *AEMO for NMI prior* change to *Apply to AEMO for an allocation of NMIs* Also process needs review. Basically it's: • FRMP requests NMI from LNSP/ ENM • LNSP / ENM Allocates NMI • LNSP / ENM loads NMI to MSATS • LNSP / ENM gets NMI/NMI block from AEMO *The clauses in this section are for separate processes – For instance AGL suggests that 2.2(a)(i) should state* *(i) The FRMP must apply to the relevant LNSP or ENM for a NMI prior….* Clause (ii) should be deleted or located to another section or these should be a new clause covering both LNSPs and ENMs for application to AEMO for a NMI / NMI block. See Cl 3(a)(v), which indicates an ENM may be allocated a NMI block. Also, clause (ii) – the ENM is responsible for the child connection (whether or not a NMI is assigned) and has a responsibility to register that child in the market.

Clause	Heading	Participant Comments AGL – National Metering Identifier
3	NMI STRUCTURE	Poorly worded Suggest restructuring to be clearer on what information is used Suggest breaking into • historic • Transmission • Distribution / Embedded Network Also, clause (d) states that all NMIs issued for connection points which become contestable after 1 January 2001 are required to be all numeric. wholesale NMI's are alphanumeric.
4	NMI REGISTERS	
5	NMI CHECKSUM	Clause 5(b) should be removed as this is a MSATS CATS requirement (not a NMI procedure requirement) and should be clearly stated in the CATS procedure documents.
6	DATASTREAM SUFFIX	
7	DATASTREAM SUFFIX FOR INTERVAL METERING DATA	
7.1	Datastream Suffix for Accumulated Metering Data	With the substantial rollout of smart meters and the increased application of reactive energy tariffs, AGL suggests that consideration be given to assigning a data stream for reactive energy.
7.2	Wholesale Connection Points	

Clause	Heading	Participant Comments AGL – National Metering Identifier
8	CONNECTION POINTS WITH TYPE 1 METERING	
9	CONNECTION POINTS WITH TYPE 2 METERING	
10	NMI RULES	**Rule 2 – para 5 – *If an existing….*** AGL has substantial concerns about the implementation of this rule, which would require a network NMI becoming an embedded network NMI and an embedded network NMI becoming a network NMI. AGL believes that in general, NMIs should be abolished rather than having them move between LNSP responsibility and ENM responsibility for the following reasons: 1. Remaining obligations on the retailer; 2. Costs of implementing changes to network system validations; 3. Long term obligations imposed on ENMs and other participants; 4. Unnecessary obligations imposed on small ENOs; and 5. Movement of a NMI between connection points. 1. The National Electricity Retail Law, Div 3 R22, states: 22—Obligation to make offer to small customers (1) A retailer must make an offer (a standing offer) to provide customer retail services to small customers for whom it is the designated retailer— (a) at the standing offer prices; and (b) under the retailer's form of standard retail contract.

Clause	Heading	Participant Comments AGL – National Metering Identifier
		Note— This subsection is a civil penalty provision. We believe that in the situation of the NMI moving between LNSP and ENM with the roles retained, leads to the potential for the previous retailer to be obligated to make an offer to that customer should other commercial arrangements not be completed or at a later date in the future when the next customer is making their decision. AGL does not believe that this is an acceptable obligation to be placed on any retailer. We believe that it would be cleaner for the NMI to be abolished so that the obligation assigned to the FRMP as the 'designated retailer' (and other market participants) would cease. 2. Cost of changing network system validations The implementation of the Embedded Network Manager was predicated on providing a clear management and responsibility for managing NMIs relating to Embedded Networks. The proposed requirement of having NMIs move between NSPs and ENMs will require the NSPs to implement further system changes to ensure they can validate the small number of unique NMIs which are moving between both environments. This will require substantial changes to NSP systems which can validate a small number of unique NMIs rather than validating NMI blocks. There is no specific rule which requires NMIs to be maintained across NSPs and ENMs. AGL would suggest that a cost benefit analysis of the NSP changes for such a small number of NMIs would not be worthwhile and therefore proposes that this obligation be removed. If NMIs move between NSPs and ENMs then AGL believes they should be made extinct and new NMIs created.

Clause	Heading	Participant Comments AGL – National Metering Identifier
		3. Long term obligations imposed on market participants. AGL believes that by retaining a market NMI with the associated roles when a NMI is returned to the embedded network is not acceptable as this places various ongoing obligations on all those associated roles (see point 1). If that NMI was to be reactivated then those previous participants are likely to be affected by the market processes structure (eg CATS transfers etc.), metering obligations etc. when they may have no commercial interest in the new parties at that NMI. Again, AGL does not believe that it is appropriate to require long term obligations to be retained by market participants in this situation. 4. Unnecessary obligations imposed on small ENOs Small ENOs are not require to have an ENM permanently appointed. The proposed process of not extinguishing a NMI which is no longer in the market will require small ENOs to continue to engage ENMs where there is no market requirement. AGL believes that this is inefficient in terms of the NEO and adds an unnecessary burden of cost on ENOs and ENO customers for no benefit. 5. Movement of a NMI between connection points In clause 1.1 AEMO has stated that: The *NMI* is a unique identifier for each *connection point* When a NMI is no longer connected to the LNSP network, but rather is supplied through the Embedded Network parent connection point or vice versa, it would be reasonable to argue that a connection point has changed, which supports Rule 1:

Clause	Heading	Participant Comments AGL – National Metering Identifier
		A NMI cannot be changed or reallocated to another connection point As such, AGL believes that it is more appropriate for NMIs which move between an embedded network and an NSP to be extinguished thus ensuring clarity of the NMI connection and closure of all associated roles. **Rule 3** Rule 3 doesn't work in all instances – eg Allocate NMI for new connections. Further, this procedure is for allocation of NMIs, not communications between participants and it is not appropriate for this procedure to attempt to deal with such matters. The clause at best should refer to MSATS transactions only, but these are covered in other AEMO procedures and are not necessarily relevant to this procedure.
11	UTILISATION OF NMI FOR AEMO DATA	
11.1	Data Delivery to AEMO (MSATS System)	
12	EXAMPLES OF NMI APPLICATION – INTERVAL METERING DATA	The diagrams would be more useful if the NMI and registers were shown within the diagrams instead of outside the diagrams. For ongoing consistency diagrams should only show alpha numeric NMIs where they are associated with wholesale points.
12.1	One End User metered on the secondary side of transformer	

Clause	Heading	Participant Comments AGL – National Metering Identifier
12.2	One End User, multiple metered on the secondary side of transformer	
12.3	One End User, previously two tariff metering, eg general supply & off-peak on secondary side of transformer	
12.4	One End User, two controlled loads, one twin element meter	
12.5	One End User, two twin element meters	
12.6	One End User, multiple meters on secondary side of multiple transformers in the same substation building and LV switchboard in common switchroom	
12.7	Three End Users, metered on secondary side of multiple transformers in the same substation building	
12.8	One End User, two separate HV supplies to two separate substations, both metered on secondary side of the transformers	

Clause	Heading	Participant Comments AGL – National Metering Identifier
12.9	One End User, two separate substations adjacent to each other or one single substation with two separate transformers in a single substation, with a “normally open” point separating the HV supplies into two sources	
12.10	One End User, two separate substations adjacent to each other or one single substation with two separate transformers, with the HV supply originating from a single source	
12.11	One End User, two separate substations not adjacent to each other but on same premises	
12.12	Multiple End Users, High rise building	
12.13	One End User with multiple supply points	
12.14	One End User with Standby Supply	
12.15	One End User or Participant, Wholesale Metering at Transmission Node	
12.16	One End User or Participant, Wholesale Metering at Transmission Node	

Clause	Heading	Participant Comments AGL – National Metering Identifier
12.17	One End User, Wholesale Metering at Transmission Node	
12.18	Street Lighting (Type 7 Metering Installation)	
13	EXAMPLES OF NMI APPLICATION – ACCUMULATED ENERGY DATA	
13.1	Single Meter with Single Datastream	
13.2	Two Meters each with Single Datastream	
13.3	Two Meter Installation, One Meter Recording Consumption for a Controlled Load	
13.4	Three Datastream Meter with Single Measurement Element	
13.5	Multi-function Meter	
13.6	Two Multi-function Meters	
14	ENERGY DIRECTION FLOWS	
15	ALLOCATION OF NMIS FOR TYPE 7 METERING INSTALLATIONS	

Clause	Heading	Participant Comments AGL – National Metering Identifier
15.1	Common Requirements across the NEM	AGL has concerns about the common requirements for NMI allocation to unmetered loads. The ability to correlate the physical connection point and associated load is quite difficult when there is only a single NMI for a large number of assets. AGL would prefer that the convention that exists for meter loads be continued for new unmetered loads (not street lighting) connected within the NEM. That is, each separate connection point has a NMI. This ensures that devices associated with each connection pointy are suitably identified and allocated to the correct parties for settlement and more appropriately supports loss calculations for each LSNP. Recent investigation into unmetered load connection points has identified that a simple connection point (e.g. bus shelter or public telephone) often has additional equipment connected to that unmetered supply, such as electronic advertising displays in bus shelters, modems etc. associated with public telephone boxes, which is not adequately catered for in the current processes with bulk assets allocated to a single NMI. AGL believes that by allocating NMIs to each connection point a substantially better correlation of connection and associated assets will be achieved.
APPENDIX A	SAMPLE JAVA CODE FOR NMI CHECKSUM	
APPENDIX B	EXAMPLES	

6. Qualification Procedure

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments AGL – Qualification Procedure
1	INTRODUCTION	AGL seeks clarification from AEMO as to whether automatic registration in these roles would apply to existing participant / participant categories. For example, is there any reason an existing retailer could not seek immediate accreditation as an Embedded Network Manager ?
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	PREPARATION	
2.1	Mandatory Requirement	

Clause	Heading	Participant Comments AGL – Qualification Procedure
2.2	Pre-Reading	The list of documents in the first table in this section relating to the B2B Procedures is likely to be inaccurate following the commencement of the B2B consultation. Further, for an Embedded Network Manager, AGL knows of no specific reason they would be required to become B2B participants. Therefore AGL suggests that the pre-reading list be further reviewed for all parties. Further, following the redevelopment of the B2B Procedures, the MDP may be required to understand more B2B Procedures than those currently listed. Finally, AGL does not believe that an AEMO procedure should reference AER documents. AEMO may reference the ENM to the AER for further information.
2.3	Pre-Application Meetings	
3	QUALIFICATION PROCESS	
3.1	Application	
3.2	Accreditation Checklists	The4 category column in table ??? does not provide a clear reference to where there is a clear description of the different category types.
3.3	Application Fees	AGL considers the user pays principle to be appropriate, but does believe that the clause should read all '**reasonable'** costs as any amounts or disbursements charged by AEMO should be reasonable. Further, if there are classes of participants who can be immediately registered in that category (e.g. as an ENM) then AGL does not see that any fee should be required, especially as they are already paying participant fees.

Clause	Heading	Participant Comments AGL – Qualification Procedure
3.4	Queuing Policy	
3.5	Review for Completeness	
3.5.1	Inadequate Responses or Missing Information	
3.5.2	Application in Abeyance	
3.6	Pre-Production Assessment	
3.6.1	General	AGL questions why an ENM would require access to the B2B hub. They may choose to use it, but AGL does not believe that they are required to use it.
3.6.2	MarketNet	
3.6.3	MSATS	
3.6.4	Applicant System Testing	This section and further sections seems to be very highly directed to participants with market systems (eg MP/MDPs). The system requirements for an Embedded Network Manager are likely to be far less substantial and AGL believes that these sections and section 3.7 should be reviewed for a more appropriate process for an ENM.
3.6.5	Test Results	

Clause	Heading	Participant Comments AGL – Qualification Procedure
3.7	Independent Review	This section and further sections seems to be very highly directed to participants with market systems (eg MP/MDPs). The system requirements for an Embedded Network Manager are likely to be far less substantial and AGL believes that this section 3.7 should be reviewed for a more appropriate process for an ENM.
3.7.1	On-Site Risk-Based Review	
3.8	Final Accreditation Review	
3.9	Completion of Review	
3.9.1	AEMO Accredits and Registers Applicant	
3.9.2	Application not Successful	
4	MAINTENANCE OF ACCREDITATION AND REGISTRATION	
5	RE-ACCREDITATION AND REGISTRATION	
APPENDIX A	APPLICATION FORM	

7. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments AGL – Embedded Network Manager
1	INTRODUCTION	
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	OBLIGATIONS	
2.1	Embedded Network Management Services	
2.2	Use of Sub-Contractors	
2.3	Insurance	
3	SYSTEMS AND ADMINISTRATION	

3.1	Systems and Interface Requirements	AGL again questions why an ENM is required to have B2B systems. AGL is unclear what processes an ENM undertakes which require them to establish and maintain a B2B interface ? If an ENM chose to be a B2B participant, then AGL would expect any obligations to arise from becoming a B2B participant. AGL believes that clause (e) should be reviewed with further legal consideration. While an ENM may provide information to another participant, it would be expected that that the information is provided according to privacy provisions and appropriate provisions of commercial confidentiality as part of that's party's functions within the NEM. It is not appropriate for an AEMO procedure to give free, perpetual licence to copy, transfer or use such material. The material is provided for a purpose and its use should be limited to that purpose and not other purposes within the NER.

3.2	Embedded Network Information	**Clause (a)** AGL questions the requirements of clause (a). A retailer who becomes responsible for a child connection point will be required to appoint a metering coordinator for that point. Surely that metering coordinator would be responsible for maintaining information relating to the metering installation at that point as the parent FRMP MC will be responsible about the market meter for the parent. **Clause (f)** This clause seems overly bureaucratic and far too onerous. AGL would expect any business to maintain the appropriate and relevant correspondence for the role, participants and associated functions, not correspondence with **all persons**.
3.3	Audits Undertaken by AEMO	AGL questions why a review undertaken by AEMO is specified to be negative assurance. Depending on the nature of any findings or issues which may arise a greater or lesser degree of assurance may be require. Further, we believe that the term negative assurance is no longer used – but rather the terms are *limited* or *reasonable* assurance. AGL suggests that the type of assurance be removed from this section and the level be determined on an as needs basis.
3.3.1	ENM to Assist	
3.3.2	Timing of Audits	AGL again notes the use of and between clauses. The word ***or*** should be used.
3.3.3	Notice of Audit	AGL again notes the use of and between clauses. The word ***or*** should be used.

3.4	Other Audits	
3.5	Review of Accreditation	AGL again notes the use of **and** between clauses. The word ***or*** should be used.
3.6	Disputes	
4	MARKET INTERFACE FUNCTIONS	
4.1	NMI Allocation	AGL notes that while the ENM has five business days to provide the NMI when it is created, there is no SLA on how long it will take to allocate a NMI. It is not reasonable for the ENM to have no SLA for the allocation of a NMI. AGL believes that the process from request to provision of NMI should be achievable with five business days.
4.2	Distribution Loss Factors and Transmission Node Identity	
4.2.1	Site specific DLF	
4.2.2	Small load DLF	
4.2.3	TNI	
4.3	MSATS Setup	

4.3.1	Market Exit	AGL notes the obligations for market exit and strongly supports the NMI being end dated after the work has been done to remove the NMI from the market. Clause (c) - Current roles will have to be removed from the NMI. There will be no FRMP or MC or MP/MDP. AGL strongly rejects this procedural element as the market participants' obligations will have ended it when the NMI returns to the Embedded Network.
4.3.2	Resumption as Child Connection Point	See above AGL believes that very few sites which have reverted back to an embedded network will re-enter the market in a short timeframe. Further, as many of these are likely to be commercial, then there is no guarantee that the connection point for the child NMI will be the one which was used initially.
4.3.3	Physical Rewiring to Join an Embedded Network	See above
4.3.4	Network Tariff Code Update	
5	DELIVERY OF INFORMATION UPON DEREGISTRATION	

8. Unmetered Load Guideline

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments AGL – Unmetered Loads
1	INTRODUCTION	
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	APPLICATION PROCESS	
2.1	The process	If the process for assessment of an unmetered load is to seek eligibility in conjunction with an LNSP (Blue Diamond 1) then it may be more preferable to either have an LNSP as a supporting proponent when the application is made. If no LNSP is a supporter of a device, then perhaps a request should be made of all LNSPs to determine if they would contemplate connecting the device.
2.2	The Outcome	
3	DISCLAIMER	
4	MATERIAL TO SUPPORT APPLICATION	

Clause	Heading	Participant Comments AGL – Unmetered Loads
4.1	Generally	Clause (h) check grammar ….95% assurance (confidence level) that the mean the Unmetered Device *load* ….
4.2	Determination of a Single Unmetered Device Load Value for Controlled Unmetered Devices	
4.3	Determination of Annual Energy Consumption for Uncontrolled Unmetered Devices	
4.4	Load value	
4.5	Control Equipment	
4.6	Sampling for LED devices	

9. Exemption Guidelines – Small Customer Metering Installation

Clause	Heading	Comments AGL - Small Customer Metering Installation
1	Purpose	This guideline is focussed on the exemption process for connecting a meter to a telecommunications network, but does not link to a customer objection for telecommunications. AGL understand that AEMO would have to determine that any small meter which is classed as 4A, but for which there is no record of a telecommunications exemption would, by a process of elimination, have to assume that these remaining sites are customer objections. AGL considers this a poor outcome and believes that any site which is classed as 4A should have a record of a customer objection or telecommunications exemption provided to AEMO which is discoverable and should be identified within MSATS as customer Objection or telecommunications exemption.
2	exemption	It has been widely discussed that the establishment of a telecommunications connection may be achievable but at a significant cost. The National Electricity Objective (NEO) requires that electricity services be provided in an efficient investment and operation in terms of price and security of supply. AGL therefore considers that the cost of telecommunications charges relative to the cost of manual meter reading and energy consumed should be considered as part of the exemption process so that the provision of telecommunications is provided within the obligations of the NEO.

Clause	Heading	Comments AGL - Small Customer Metering Installation
2	Exemption	NER Cl 7.8.4(a) provides for an MC to demonstrate that there is no existing *telecommunications network* which enables remote access to the metering installation. In order to reasonably demonstrate the lack of a telecommunications network at a site, AGL would consider it reasonable that the MC and their contract parties have time to evaluate a site and the MP would have to establish appropriate telecommunications contracts or systems or networks prior to being required to submit the exemption. Therefore, in the interests of meeting the National Electricity Objective (NEO) for efficient operation of electricity services, AGL suggests that an MC/MP have 10 business days (in line with the time specified in the NER for type 4 meter malfunctions) from the installation date of a small customer meter to attempt to establish a connection to a telecommunications network prior to being required to submit an exemption.
2.2.2	Expiry	Clause 2.2.2(b) states that the exemption will cease 3 months after a telecommunications network provides coverage in the vicinity of a metering installation. AGL queries how this expiry would work operationally. The MC/MP may not be aware of a change in telecommunications network or start date, and could therefore discover that an exemption has expired unexpectedly, making them non-compliant. The implication is that an MC must have a mechanism to monitor telecommunications company network roll outs. Further, the presence of a telecommunications network in the vicinity does not mean that there is telecommunications availability at the metering installation AGL believes that the clause should be redrafted to state that Within 3 months of becoming aware of a telecommunications network providing coverage within the vicinity of a metering installation the MC must review the status of the metering installation and either enable communications (assuming no customer objection) or submit a new exemption application.

Clause	Heading	Comments AGL - Small Customer Metering Installation
3 4	Applicant Change of Metering Coordinator	AGL considers that limiting the applicant to the MC may be inefficient and that the exemption should reside with the MP as the provider of the meter at the site. AGL considers it likely that some MPs may be contracted to multiple MCs and that in undertaking a customer churn, including an MC churn, it would be unreasonable to consider that the same meter at site is only granted an exemption from one MC, rather than any MC through which that meter service is procured. AGL believes that if the exemption is limited to a single MC, then other MCs may reject a request to be an MC at a site until they can make a further application to AEMO, which would delay a customer churn. Further, the process of multiple MCs making application to AEMO for a meter provided by a single MP at the same site is inefficient and costly and is in contradiction to the NEO principles. Therefore, AGL believes that, while the current MC may be responsible for making the application, the exemption should reside with the MP and site and be discoverable through MSATS for incoming MCs and retailers.
3.3	Timing of Application	Refer to comments above. AGL believes that there should be a 10 business day period from the installation of the meter until an exemption is required to be submitted, as is requires in the Exemption Procedure for malfunctions. This would allow for an efficient and cost effective electricity service to be provided by the MC/MP and reduce the number of applications required to be made to AEMO.
4	Change in Circumstances	AGL believes that the MC at the time (irrelevant of whether original or new) should be responsible for extending or changing the exemption.

10. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments