METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

POC PROCEDURES CONSULTATION (PACKAGE 2)

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Shopping Centre Council of Australia (SCCA)*

Completion Date: *16 January 2017*

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1. Glossary and Framework

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Clause	Heading	Participant Comments
2.7	Metering Service Level Procedures	We have comments on this Procedure
2.8	Service Level Procedure - Embedded Network Managers	We have comments on this Procedure

2. MSATS Procedures: National Metering Identifier

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Clause	Heading	Participant Comments
3	NMI STRUCTURE	We note the proposed change (3 (a)) whereby the ability for AEMO to allocate a block of NMIs to an ENM has been removed. This means that an ENM may have to approach AEMO each time for individual NMI allocation. This would seem to be an inefficient process, when compared with the previously

		proposed approach. Our assessment of the Consolidated *Summary of Submissions and AEMO Repsonses* does not readily identify why this change has been made. We would appreciate clarification on this issue.
10	UTILISATION OF NMI FOR AEMO DATA	We note the change from the previously proposed approach, whereby we supported that when a NMI moves from a distribution (LNSP) network to an embedded network (or vice versa), the NMI cannot be changed. It is now proposed that such an such a circumstance will be added to the conditions that require the extinction of a NMI. We note that despite the proposed change, this is not AEMO's preferred option (ref: 4.1.4 – Draft Report and Determination). We do not support the proposed change, and do not believe that the proposed change will support positive customer outcomes.

3. Service Level Procedure – Embedded Network Manager

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Clause	Heading	Participant Comments
3.1	Systems and Interface Requirements	We remain concerned with section 3.1 (e). The AEMO has stated in its response to previous submissions that the intention of this provision is to ensure that an End User can seek an alternate energy provider. At this is the case, we recommend definining 'intellectual property' as being all information required by an End User to allow the End User to move to an alternative energy provider. We suggest that the current use of 'intellectual property' as an undefined term is too broad and could result in the unintended transfer of intellectual property rights in the ENM's ancillary information (such as programs or processes used by an ENM) to a third party.

		We also clarify that our previous comments in relation to 'security issues' relate literally to issues involving property and personal security, including the need to ensure that a shopping centre's wiring information and intellectual property, to the extent it relates to a security system (e.g. CCTV, control room), should not be required. We do not believe that the insertion of the term "relevant" in front of "wiring information" satisfies the points made above or below. In terms of the business interface for ENMs, we remain concerned that AEMO is commiting ENMs to potential costs that we are still unable to ascertain.
3.3	Audits Undertaken by AEMO	We maintain our previous comments that the proposed auditing requirements seem to be excessive. AEMO has not, in our view, appropriately addressed the issue to ensure that cost and time will be appropriate for relatively small participants.