METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

POC PROCEDURES CONSULTATION (PACKAGE 2)

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**:* Red Energy & Lumo Energy

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1. Glossary and Framework

Red Energy and Lumo Energy have no comments on the glossary and framework at this stage.

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

Clause	Heading	Participant Comments
2	BREACH OF THE NER OR PROCEDURES UNDER THE NER	Red Energy and Lumo Energy recommend that the clause is redrafted as the additional information in this clause is not required. Should AEMO decide to retain the wording, it is recommended that this should be without limitation. Proposed wording: The failure of an MP, MDP, ENM or MC to comply with the NER or any applicable procedures under the NER, or a failure to meet a condition of accreditation, (**Breach**) that ~~may~~ comes to AEMO's attention ~~following compliance audits of MPs, MDPs, ENMs or MCs compliance, information in AEMO systems and records, complaints from affected Participants or End Users, notifications from other regulatory bodies or~~

		~~through self-reporting~~.
3.2	Review of Capability for Ongoing Compliance	In relation to 3.2: Red Energy and Lumo Energy would like to see AEMO retain the ability to review a MP, MDP, ENM or MC irrespective of whether they have remedied a breach notice. We recommend the redrafting of this clause to read: (a) ~~If~~ an MP, MDP, ENM or MC must ~~has not~~ remedy~~ied~~ the breach referred to in the Notice of Breach within 7 *days* after the issue of the notice. (b) AEMO must ~~will~~ conduct a review to assess the relevant MP, MDP, ENM or MC's capability for ongoing compliance with the NER or applicable procedures under the NER as required by clause 7.4.4(c)(2) of the NER, or clause 7.7.3(c)(2) (**Review**) where the breach has not been remedied. (c) AEMO may conduct a Review where the

		breach has been remedied. In relation to 3.2.4: Red Energy and Lumo Energy disagree with the level of cooperation and assistance being provided to AEMO being a factor of consideration. Whilst we agree with the intent that AEMO would like parties to be cooperative and provide assistance, it is inappropriate for consideration to be placed on the level of assistance. The Review and the Breach should be assessed against the type of breach, its impact on the market, not against how cooperative the party is. Proposed redrafting: AEMO may take any other relevant matters into consideration, such as whether the Breach was reported by the relevant MP, MDP, ENM or MC who committed the Breach, the extent to which another Participant or other person might have contributed to the Breach~~, the conduct of the relevant MP, MDP, ENM or MC after receiving the Notice of Breach,~~

		~~including the level of co-operation and assistance provided to AEMO during its Review~~.
3.3	Determination of Type of Breach	In relation to 3.3.3(b), Red Energy and Lumo Energy recommend a small amendment in relation to a material breach, as it civil penalty processes may or may not have been completed at the time in which the material breach is identified. Proposed redrafting: (b) a breach of the NER or procedures under the NER that may ~~have~~ result~~ed~~ in the MP, MDP, ENM or MC incurring civil penalties or other sanction under the NEL;
4.2	Constraints	Red Energy and Lumo Energy would like AEMO's proposed limitation to be based on the type of customer or meter. Placing constraints which are only identifiable once the meter provider is at the site does not lead to a positive customer experience or outcome. Proposed redrafting:

		(b) limiting the types of activities that can be undertaken under an accreditation category (such as not being able to install CT metering~~only being able to install single phase *metering* rather than three-phase~~, or only being able to read *metering installations* that have a single Datastream);

3. Exemption Procedure (Metering Installation Malfunctions)

Clause	Heading	Participant Comments
2.3	AEMO's Determination	Red Energy and Lumo Energy recommend that if AEMO propose to take 5 business days to assess an application, then whether the wording in clause 2.3(d) should also be amended?
2.4	Matters taken into Consideration	Red Energy and Lumo Energy highlight the inconsistency between 2.4(g) and the important note in Appendix A. We recommend that the 'where provided' is removed from clause 2.4(g) if AEMO will reject an application that does not have a draft MP rectification plan.

Appendix A.	APPLICATION FOR EXEMPTION	It is unclear from the form in Appendix A whether it can be submitted for multiple NMIs that are affected with the same malfunction, or whether AEMO is intending to receive one form per metering installation/NMI. Red Energy and Lumo Energy recommend that where there is the same issue, that AEMO accept one form with multiple installations that require rectification. This is consistent with the requirements of the rectification plan.
Appendix B.	APPLICATION FOr EXTENSION	As per above, the extension process should also be available for multiple metering installations/NMIs.

4. MSATS Procedures: National Metering Identifier

Clause	Heading	Participant Comments
		Red Energy and Lumo Energy do not think that the amendments to this Procedure have increased the clarity, and in some cases have increased ambiguity

		in what does and does not apply. For example, NMI Rule 2, which previously stated that a NMI cannot be changed or reallocated to another connection point, is indirectly covered off under section 1.1 which states that a NMI is a unique identifier. For new entrants, it is important to state that a NMI must not be re-allocated. Another example of the ambiguity is how 9.2(a)(iii), 9.2(a)(v) and 9.2(c)(viii) interrelate. It can be read that a NMI can be re-allocated when a site flips between being in and not in an embedded network, but it can also be read that a NMI can not be re-allocated where the role of ENM changes. Further, we consider that there is a gap between the NER and this Procedure. Rule 7.8.2(c)(2) does not appear to have been covered off in the Procedure. The rule states: *7.8.2(c) The financially responsible Market Participant at a connection point must:*

		(1) apply to the Local Network Service Provider for a NMI; and *(2) provide the Metering Coordinator with the NMI for the metering installation within 5 business days of receiving the NMI from the Local Network Service Provider.* Red Energy and Lumo Energy would like AEMO to revisit this Procedure and ensure that all obligations are unambiguous and abundantly clear.
4	NMI REGISTERS	Recommend that this reads LNSP not NSP.

5. Qualification Procedure

Red Energy and Lumo Energy have no further comments on the Qualification Procedure. Noting that the AEMO response to stage 1 did not address our initial concerns.

6. Service Level Procedure – Embedded Network Manager

Clause	Heading	Participant Comments
4.1	NMI Allocation	Red Energy and Lumo Energy consider that the additional obligations in clause 4.1(d) should sit in the MSATS Procedure and not in the ENM SLP. We do not consider that MSATS obligations should be duplicated into the SLPs.
4.2.1	Overview	It is unclear what type of response is required from "AEMO expects". Is it a may, must or should obligation being placed on the ENM?
4.3	MSATS Setup	See comments for NMI Allocation. Red Energy and Lumo Energy consider that all MSATS obligations should sit in the appropriate Procedure (MSATS). We consider that without all obligations sitting in one Procedure, it is more likely to have divergence in processes.
4.3.4	De-energisation and Re-energisation of Child NMIs	It is unclear whether the ENM will be also required to change the Child NMI status at the meter level where

		the de-energisation has been completed remotely, equivalent to the requirements placed on MPs in the MSATS Procedures. From a governance perspective, the obligations should be both consistent and placed in the MSATS Procedure.

7. Unmetered Load Guideline

Red Energy and Lumo Energy have no comments on this Procedure.

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments