METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

POC PROCEDURES CONSULTATION (PACKAGE 2)

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: Active Stream*

***Completion Date**: 16/01/2017*

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1. Glossary and Framework

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments

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

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
3.2.1	Remediation Plan	*'If an MP, MDP, ENM or MC in receipt of a Notice of Breach provides AEMO with a remediation plan…'* Clarification is sought if a remediation plan is a requirement for AEMO's review post the 7 day period for rectification. If so, suggest rewording to make it a requirement.
3.2.4	Other Relevant Considerations	Formatting:

		Suggest aligning the format of this sub clause to mirror the previous sub – clauses i.e. Clause Numbering
3.3.1	Immaterial Breach	'An Immaterial Breach is a Breach that does not have a material adverse effect on either or both of the following:' Suggest rewording for simplicity: 'An Immaterial Breach is a Breach that does not have a material adverse effect on any of the following:'
3.3.2	Significant Breach	'A Significant Breach includes a Breach, or a series of Breaches taken together, that if not remedied, is, or are, likely to have a material adverse effect on either or both of the following:' Suggest rewording for simplicity: 'A Significant Breach includes a Breach, or a series of Breaches taken together, that if not remedied, is, or are, likely to have a material adverse effect on any of the following:'
3.3.3 (a)	Material Breach	'A Breach, or a series of Breaches taken together, that has, or have, a material adverse effect on either or both of the following:' Suggest rewording for simplicity: 'A Breach, or a series of Breaches taken together, that has, or have, a material adverse effect on any of the following:'
4.2 (b)	Constraints	Suggest the removal of the examples in the parenthesis, especially the second one and leaving the description of the constraint.

		If a participant is restricted in reading their multi- datastream meters especially those that are remote communications enabled, this would have impacts to other participants also from a billing/revenue/settlements perspective
6.2.1	Process	Information upfront for Participants. Suggest the inclusion of an AEMO addressee & address for the participant to forward their formal application for deregistration.

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
2.3	AEMO's Determination	The exemption process has been revised from its initial draft. It appears it has been determined that 2 bus days is not sufficient for the exemptions to be processed and the timeframe has been amended to 5 bus days and noted. From an applicant's perspective propose the following: • Clause (d) be amended to 5 business days to align with the amendment made in the opening sentence of this section • More importantly, clause (a) (b) and (c) which incorporate the 'front end receipting' of the exemption process be completed within **2** bus days from receipt of the application. This would provide a leaner process and enable the applicant follow up if a receipt has not been received or provide the additional information in a timely manner, instead of waiting for 5 bus days to trigger 2°

		processes.
2.4 (g)	Matters taken into Consideration	*'where provided, a draft of the MP's rectification plan;'* Appendix A however has an important note stating that the application will be rejected if a draft of the MP's rectification plan is not provided. Clause 7.8.10 (c), however, states that an MP must provide a rectification plan **if** an exemption has been granted. From the above, suggest: - Removing the rejection clause of the appendix A application form as it may not be possible to know a rectification plan at the time of applying for an exemption. In practicable terms, for most scenarios, the MP will not identify a metering malfunction until they visit the site and attempt to rectify the malfunction. Any secondary attempts of rectification, will require an exemption to ensure compliance to the NER and allow, if applicable, appropriate outage customer notifications. The rectification plan may not be available at the time the application is been submitted.
2.8	Current MC's Obligations during the Exemption Period	Clause 7.8.10 (c), states that an MP must provide a rectification plan **if** an exemption has been granted. Suggest an additional clause to 2.8 similar to the second paragraph of 3.1 Timing. The Current MC must: - Ensure that the MP's rectification plan is provided to AEMO in accordance with 7.8.10(c) of the NER, by the date specified by AEMO in its notice of exemption to the Current MC.
2.8(b)	Current MC's Obligations during the	There is no NER obligation to provide a rectification plan to all affected Participants.

	Exemption Period	The obligation is to provide AEMO. The affected Participants have been advised of an exemption for the metering installation. If a change is made to the plan the only probable point of interest for other Participants would be that the exemption has been extended and this would be covered by 2.5 (d). Suggest removing: “and all affected Participants’. This would cause additional administrative handling for no added value.
3.1	Timing	Clause 7.8.10 (c) states if an exemption has been provided the MP must provide AEMO….. Suggest that ‘must’ be replaced with ‘may’ as there is no NER obligation on the MC to provide a rectification plan. It is on the MP.
Appendix A.	APPLICATION FOR EXEMPTION	Qn 11: This cannot be answered unless a rectification plan is determined and provided. Given this is an application form for exemption and it is not mandatory/ or possibly practicable at the time of the application to provide a rectification plan, suggest the following: - This field becomes an ‘if applicable’ field, as the smaller font of this form advise to complete **all** sections. However, this question is more suited as a content of the rectification plan, section 3.2. Hence propose that it is removed from the application form and added to section 3.2.

		Clarification is sought as to why AEMO would want to know about non-viable rectification options for the metering installation malfunction which the MP has ruled out. Especially as the approach provided may be the only option.
Appendix A.	APPLICATION FOR EXEMPTION	Remove the important note as AEMO's action is in contradiction of clause 7.8.10 (c). Defining the plan as 'draft' does not guarantee that a plan will be available at the time of application. Details which should be considered in determining to grant exemptions, should be what actions have already been taken to rectify the malfunction. This has been provided for in Q10.
Appendix A.	APPLICATION FOR EXEMPTION	Propose the addition of a Unique Identifier to be provided for each exemption application. This would assist in referencing any queries or more specifically when requesting an extension to an existing exemption.
Appendix B.	APPLICATION FOr EXTENSION	If a Participant is applying for an extension to an existing exemption, it should be noted that in most scenarios if not all the existing rectification plan has to be updated. An updated rectification plan should be provided for an extension application.
Appendix B.	APPLICATION FOr EXTENSION	As this is an extension of an existing exemption application which has been previously granted, section 9, 10, 11, 12 should already be available and hence would provide a duplication of effort. Suggest removing them.
Appendix B.	APPLICATION FOr EXTENSION	Propose a Unique ID for each exemption application (appendix A) If agreed: Then add an additional field to this form where the applicant can captured the unique ID of the original application, as a reference point, for which an extension is been

		requested.

4. MSATS Procedures: National Metering Identifier

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Clause	Heading	Participant Comments

5. Qualification Procedure

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3.4.3	Applicant not Responsive during Qualification Process	If the requested documentation is not provided or application fee not paid by the requested date and time, the application will be placed at the end of the queue. Clarification is sought if AEMO will advise the applicant that they have been placed at the end of the queue
3.4.4	Deemed Withdrawal of Application	Clarification is sought if AEMO will confirm the application as withdrawn.
3.5.	Pre-Production Assessment	Pre-production Assessment is section 3.5 not 3.6.
5	Re-accreditation and Registration	*Re-accreditation may be necessary for reasons such as a change to the NER, or accreditation requirements, changes to Participant processes, systems or key personnel,*

		or as a result of action taken under the Default and Deregistration Procedure. Clarification is sought as to whom AEMO class as key personnel and why would this require re-accreditation. If the business and systems processes are accredited why would there be a requirement for key personnel to trigger a re-accreditation?

6. Service Level Procedure – Embedded Network Manager

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Clause	Heading	Participant Comments

7. Unmetered Load Guideline

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments