METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

POC PROCEDURES CONSULTATION (PACKAGE 2)

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: United Energy*

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1. Glossary and Framework

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2.1	The Role of the Retail Market Market in the NEM	
2.2	Structure of Retail Electricity Market Procedures	
2.3	Metrology Procedure	
2.4	B2B Procedures	
2.5	Metrology Procedures	
2.6	Qualification Procedure	

2.7	Metering Service Level Procedures	
2.8	Service Level Procedure - Embedded Network Managers	
2.9	Default & Deregistration Procedure	
2.10	Exemptions	
2.11	MSATS Codes	
3	Glossary	United Energy welcomes the amendment of the MDM Contributory Suffix definition. Glossary Term: MDM Contributory Suffix *'A suffix defined in sections 6 and 7 of the NMI Procedure used to identify a stream of metering data and is consistent with the 'NMISuffix' contained in the 200 record of the MDFF interval metering data file.'*

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

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
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	DEFAULT PROCESS	In AEMO responses, item 10, AEMO note that the old services provider: Compliance, Assessment and Deregistration Procedures will fall away and this new procedure takes over from 1 Dec 2017. It would be useful if the old procedure remained on AEMO website clearly specifying that it has an end date of 30 Nov 17 and the new document takes over from 1 Dec 2017. Similarly with the EN Guideline and a number of other documents and guides that are being updated. Where the new documents are a different name it can often be difficult to work out that the previous documents have actually been made redundant or repealed. It would be useful if this history was maintained on the AEMO website in a manner that made it clear.
3.1	Issue of Breach Notice	AEMO in the Draft determination state in 4.3.4: “AEMO will not be developing a breach classification framework of the type suggested in submissions as it considers that the framework proposed provides

		sufficient flexibility for AEMO to address Breaches on a case-by-case basis and by taking into account prior Breaches, regardless of whether they arise under similar circumstances." UE note that many of the submissions sought more detail and clarity on the assessment of an issue into a breach classification in the framework and AEMO has responded that they wish to have flexibility. It is this very issue of flexibility which appears to be creating an issue and may be open to inconsistent application or misuse. UE suggest that any issue/breach be reviewed by a committee within AEMO so that breaches are managed in a consistent manner amongst participants and are consistently managed over time. Where the severity of the breach is not subject to the discretion of just one person, this should allay some of the issues regarding consistency, preferential relationships etc.
3.2	Review of Capability for Ongoing Compliance	
3.3	Determination of Type of Breach	
3.4	AEMO action following Review	
4	EXERCISE OF AEMO DISCRETION	
4.1	Relevant Considerations	
4.2	Constraints	
5	CONSEQUENCES OF AEMO DISCRETION	

5.1	MP, MDP or ENM	UE refers to item 67 where AEMO had agreed previously that the impacted LNSP would be a notified party of a breach. It appears now that the Notice of Breach (Appendix A) only goes to the party in alleged breach, AEMO undertake a review (presumably this is a desk based review of papers), AEMO make a determination and only then under 5.1.1 (c) does the impacted LNSP get notified. This could be a lengthy process depending on the nature of the breach and the remedial actions the party needs to undertake. UE sought to have included in the Notice to Participants and AEMO agreed: • the substance of the breach (i.e. nature and extent e.g. which jurisdiction, how many customers etc. what the issue is/was), the NER clause or procedure clause that was breached (e.g. was it failure to provide data or incorrect validations e.g. High meter reads coming through to us and being billed). These matters whilst agreed by AEMO to be include in Appendix E have not been. AEMO needs to amend the Appendix E notifications to better advise impacted participants what the issue was exactly and how extensive it is so we can consider what appropriate action we may need to take to limit impacts. UE remain concerned that the networks may be unaware of the issue or extent of the issue and if we are not seen as part of the breaching parties remediation plan.
5.2	MC	
5.3	Other Impacts	

6	VOLUNTARY DEREGISTRATION	
6.1	Application	
6.2	Process	
Appendix A.	NOTICE OF BREACH	
Appendix B.	METERING COORDINATOR DEFAULT NOTICE	
Appendix C.	NOTICE TO APPOINTERS	
Appendix D.	OUTCOME OF REVIEW	
Appendix E.	NOTICE TO AFFECTED PARTIES	

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
1	Introduction	
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	Application process	
2.1	Applicant	Refer to AEMO response pack item 6. UE appreciate the drafting that AEMO has added which clarify the arrangements under NER 11.86.7 which requires that regulated type 5/6 meters immediately before 1 Dec 2017 remain as type 5/6 meters after 1 Dec 2017, including the Victorian AMI meters. UE understand that the MC arrangements are expected to continue on and from 1 Dec 2017 with the expectation that these notifications in 11.86.7 to the FRMP are still required and the it is the new MC who will need to take the appropriate action under this procedure. UE support AEMO drafting:

		A Current MC is not required to apply for an exemption in the circumstances contemplated by clause 11.86.7(g)(2) of the NER where it is the LNSP: *(a) appointed as the Current MC under clause 11.86.7(a) of the NER; or* *(b) deemed to be appointed as the Current MC under clause 11.86.7(c) of the NER,* *in respect of a type 5 or 6 metering installation.*
2.2	Timing of Application	
2.3	AEMO's Determination	
2.4	Matters taken into Consideration	
2.5	Grant of Exemption	
2.6	Application Unsuccessful	
2.7	Extension to Exemption	
2.8	Current MC's Obligations during the Exemption Period	
2.9	Expiry of Exemption	
3	Rectification Plan	
3.1	Timing	

3.2	Contents	
Appendix A.	APPLICATION FOR EXEMPTION	UE supports the forms in Appendix A and B. It may be worthwhile to footnote that Other could be NSP2, EENSP etc. It is not that clear what roles/participant ID's might fall in the "other" category.
Appendix B.	APPLICATION FOr EXTENSION	As above.

4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
1	INTRODUCTION	
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	ALLOCATION AND ISSUE OF NMIS	
2.1	NMI Allocation by AEMO	A number of participants including UE raised concerns regarding the clarity of the NMI blocks allocated to LNSPs and to ENMs. The NMI allocation list is a market readiness work stream matter and the ability to search in CATS for other NMI's within a local area networks geographic area is a matter for the systems working group. When will these two groups make these recommendations/decisions and advise the rest of industry and when will the NMI ranges be issued so these can be incorporated into internal procedures and work instructions? UE notes the NER Clause 11.87.3 (b) which requires AEMO to commence

		maintaining and publishing an interim list of Embedded Network Managers from 1 March 2017 onward. UE recommend that the NMI blocks allocated to ENs and those allocated to LNSP be clarified and issued in a document on 1 March 2017 with the AEMO obligations to finalise and issue the other EN guides and service level documentation etc. This would make the situation on NMI number ranges clear so the businesses can consider the impacts.
2.2	Issue of NMIs by LNSPs and ENMs	
3	NMI STRUCTURE	UE is concerned by the AEMO comment that there will be no embedded information in a NMI as stated in 3 (a) (iv). Whilst the AEMO comment is directed at the NMI range and allocation processes to ENs and the linkage of the NMI to a jurisdiction or an LNSP area, UE requests that AEMO clarify that the individual NMI ranges for each LNSP are to remain. We disagree that there is no embedded information in NMI's as there certainly has been to date based on gas MIRN range by state and electricity NMI range by LNSP etc. If this is not the case this will impact our design and build processes. UE note that retailers are likely to use the NMI range linkage to the LNSP to facilitate retail tariff offers to customers. Where a NMI has no linkage to an LNSP this will be more work for the retailer to ensure a reasonable quote. UE note in 9.2 (c) (vi) that NMIs are not decommissioned where LNSP boundaries change. This seems inconsistent with the view that the NMI block is linked to the LNSP and hence LNSP network tariffs and retailer offers can be linked.
4	NMI REGISTERS	
5	NMI CHECKSUM	

6	DATASTREAM SUFFIX	
7	DATASTREAM SUFFIX FOR INTERVAL METERING DATA	
7.1	Datastream Suffix for Accumulated Metering Data	
7.2	Wholesale Connection Points	
8	CONNECTION POINTS WITH CHECK METERING	
9	NMI RULES	
9.1	NMI Allocation and Verification	
9.2	NMI Decommissioning	Decommissioning is a gas term, not an electricity term. The terminology may be better as NMI extinction consistent with the NMI status code approach. UE do not support the introduction of a NMI status code of "T" for transfer into or out of one NSP to another NSP as envisaged in the draft determination section 4.1.4. We have X, or will have N, and should use these. A new status code coming in round 3 consultation is too late. UE has given further thought to the LNSP NMI being made extinct once it is connected to the EN: • AEMO say that if the LNSP is providing metering then they remain in the MC/RP and MP/MDP roles for the children as Initial MC. Whilst we

		don't believe this is consistent with NER 11.86.7 and other aspects of the NER we agree that this is the most likely outcome. • If the LNSP makes the LNSP NMI extinct and the ENM needs to create a new NMI and apply standing data, the LNSPs that are initial MCs will need to re-establish the metering installation, data streams etc. in the NEM. UE consider that there should be transitional arrangement drafted into the procedure. • UE re-iterate the comments from pack 1 consultation that the arrangements for EN need separate meetings and considerations as this is a complicated transition UE considers that 9.2 (a) (iv) and (v) should be amended. Where UE may still be providing metering services as MC/MP/MDP, it is far easier in our systems if the existing metering remains established in the NEM with a consistent LNSP NMI. UE considers there is substantial work to close metering and make one NMI extinct and then for the ENM to establish a new NMI and UE to re-establish the metering and data streams and this may also have implications for retailers systems. UE support 9.2 (a) (iii) remaining, UE systems do not cater for the rare off chance that an EN may cease and the non UE range NMIs need to be catered for in our systems. If in the final determination, AEMO support making the LNSP NMIs extinct when they become child NMI's then 9.2 (a) (iv) and (v) need to be reworded so that it includes the existence of a parent connection point and parent metering and the change of NMI and removal of LNSP metering occurring at the same

		time: (iv~~) a *connection point* directly connected to the LNSP's *network becomes* an off-*market embedded network* connection~~*; for existing child connections points with an LNSP NMI on 1 Dec 17, once all LNSP metering as been removed* ~~(v) a *connection point* directly connected to the LNSP's *network becomes a child connection point*~~*;* *(iv) where a parent connection point and parent meter has been established after 1 Dec 17, and once all LNSP provided metering has been removed, then all child connection points that were directly connected to the LNSPs network* Information embedded in NMI structure – refer to item 3 above. The drafting in 9.2 (c) (vi) whilst consistent with the approach of no embedded information is not consistent with what we believe is the industry norm, that the NMI indicates an LNSP and hence links to network and retail offers. Boundary changes of LNSP that then do not reflect the new NMI range would lose this interpretation which applies to the bulk of the market. 9.2 (c) (vii) should be amended to make it clearer. We understand that the intent is that if the party that is in the ENM role changes to another ENM then the NMI must not be made extinct. If the party in the LNSP role changes to another LNSP indicating a change of Boundary, then we consider that the NMI possibly should change. This seems a repeat of the point in (vi) and we suggest that the clause be redrafted to 9.2 (c) (vii) changes to the party in the Role ~~of LNSP or~~ ENM
10	UTILISATION OF NMI FOR AEMO DATA	
10.1	Data Delivery to AEMO (MSATS System)	

11	EXAMPLES OF NMI APPLICATION – INTERVAL METERING DATA	
11.1	One End User metered on the secondary side of transformer	
11.2	One End User, multiple metered on the secondary side of transformer	
11.3	One End User, previously two tariff metering, e.g. general supply & off-peak on secondary side of transformer	
11.4	One End User, two controlled loads, one twin element meter	
11.5	One End User, two twin element meters	
11.6	One End User, multiple meters on secondary side of multiple transformers in the same substation building and LV switchboard in common switchroom	
11.7	Three End Users, metered on secondary side of multiple transformers in the same substation building	
11.8	One End User, two separate HV supplies to two separate substations, both metered on	

	secondary side of the transformers	
11.9	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	
11.10	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	
11.11	One End User, two separate substations not adjacent to each other but on same premises	
11.12	Multiple End Users, High rise building	
11.13	One End User with multiple supply points	
11.14	One End User with Standby Supply	
11.15	One End User or Participant, Wholesale Metering at Transmission Node	
11.16	One End User or Participant, Wholesale Metering at Transmission Node	
11.17	One End User, Wholesale Metering at	

	Transmission Node	
11.18	Street Lighting (Type 7 Metering Installation)	
12	EXAMPLES OF NMI APPLICATION – ACCUMULATED ENERGY DATA	
12.1	Single Meter with Single Datastream	
12.2	Two Meters each with Single Datastream	
12.3	Two Meter Installation, One Meter Recording Consumption for a Controlled Load	
12.4	Three Datastream, One Meter with Single Measurement Element	
12.5	Multi-function Meter	
12.6	Two Multi-function Meters	
13	ENERGY DIRECTION FLOWS	
14	ALLOCATION OF NMIS FOR TYPE 7 METERING INSTALLATIONS	
14.1	Common Requirements across the NEM	

APPENDIX A	SAMPLE JAVA CODE FOR NMI CHECKSUM	
APPENDIX B	EXAMPLES	

5. Qualification Procedure

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
1	Introduction	
1.1.	Purpose and Scope	
1.2.	Definitions and Interpretation	
1.3.	Related AEMO Documents	
2	Preparation	
2.1.	Mandatory Requirement	
2.2.	Pre-Reading	
2.3.	Pre-Application Meetings	
3	Qualification Process	
3.1.	Application	

3.2.	Accreditation Checklists	The exemption procedure makes it clear that LNSPs as MCs have type 5/6 metering installations and in accordance with 11.86.7 do not need to apply for exemptions. UE agree with this approach. This means that before/on/after 1 Dec 17 the LNSP meters remain type 5/6. This is inconsistent with the approach that AEMO has taken in response to item 24 that Vic DBs need to be accredited for type 4 MDP services. UE is unclear which clause requires an existing meter in the NEM with comms to be renamed to a different meter type and which clauses prevents a DB from exceeding the meter requirement. Before spending the money to implement these changes which we believe have no benefit, UE wishes to understand the benefits.
3.3.	Application Fees	Item 32 States Vic DBs need accreditation as Type 4 MP and MDP as the derogation has ended Query whether Type 4 MP is required as we understand all Vic Dbs are already accredited for MP. What is involved in non extensive accreditation?
3.4.	Queuing Policy	Suggest 3.4.4 be deleted. If an applicant has been placed at the end of the queue as they needed more time to respond to an item, if AEMO does not get back to the accreditation application in 3 months, then the application is deemed to be withdrawn by AEMO. The only party that should be able to withdraw their application is the party applying.
3.5.	Pre-Production Assessment	
3.6.	Independent Review	

3.7.	Final Accreditation Review	
3.8.	Completion of Review	
4	Maintenance of Accreditation and Registration	
5	Re-accreditation and Registration	
Appendix A.	APPLICATION FORM	

6. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
1	INTRODUCTION	
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	The new EN Guide should be on the AEMO website, however it should not replace the old Guide on the link but retain the history. The old Guide should remain on the website as valid from 2009 and the new Guide takes over from 1 Dec 17 so that the history of the changes is maintained in the one location on the AEMO website.
2	OBLIGATIONS	
2.1	Embedded Network Management Services	
2.1.1	The Services	
2.1.2	Additional obligations	

2.2	Use of Sub-Contractors	
2.3	Insurance	
3	SYSTEMS AND ADMINISTRATION	
3.1	Systems and Interface Requirements	
3.2	Embedded Network Information	
3.3	Audits Undertaken by AEMO	
3.3.1	ENM to Assist	
3.3.2	Timing of Audits	
3.3.3	Notice of Audit	
3.4	Other Audits	
3.5	Review of Accreditation	
3.6	Disputes	
4	MARKET INTERFACE FUNCTIONS	

4.1	NMI Allocation	This clause appears to be deal with straight forward cases: • ENM to manage the creation of a new greenfield network and assignment of NMIs; and • ENM to manage new connections on an existing network after 1 Dec 17 and assign NMIs. We note the issues for 1 Dec 17 for all existing EN and how the NMI's are managed: • The ENO must appoint an ENM, the ENM must use a CR6100 to churn the LNSP role to themselves for 1 Dec 17. Subject to the outcome of the NMI decommissioning process, the ENM must de-commision the LNSP NMI only once all LNSP metering has been removed and allocate an EN NMI using a CR2520. Where there is a new brownfield EN created after 1 Dec 2017. We would expect the process for day 1 transition also be adopted but only after the parent connection and parent meter is in place. Section 4.1 needs to be expanded to cater for all of these situations relating to EN formation and NMI allocation.
4.2	Distribution Loss Factors and Transmission Node Identity	
4.2.1	Overview	

4.2.2	Site specific DLF	
4.2.3	Small load DLF	
4.2.4	TNI	
4.3	MSATS Setup	
4.3.1	Market Exit	The procedures do not clearly describe the process for performing a 'market exit' when a NMI is becoming part of an embedded network as an 'off market connection point'. Could AEMO please make it clear whether there is an expectation that the CR509x is used prior to any of the clauses listed within this section to make the relevant NMI a Child NMI and change the LNSP role (and whether a CR to Change the LNSP Role is required prior to this). UE then assumes that the ENM would update the NMi Status to 'N', before the remaining steps described are completed.
4.3.2	Resumption as Child Connection Point	This scenario covers an off market child with a NMI being reactivated in the market by changing NMI status from N to A. There is no obligation in 4.1 that every child within an EN has an allocated NMI right from the commencement of the EN. Where is the obligation that an off market child who has an existing connection with no NMI is allocated a NMI so they can churn to their retailer of choice?
4.3.3	Network Tariff Code Update	

4.3.4	De-energisation and Re-energisation of Child NMIs	
4.3.5	Child NMI Abolishment	
5	DELIVERY OF INFORMATION UPON DEREGISTRATION	

7. Unmetered Load Guideline

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
1	INTRODUCTION	
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	APPLICATION PROCESS	
2.1	The process	
2.2	The Outcome	
3	DISCLAIMER	
4	MATERIAL TO SUPPORT APPLICATION	
4.1	Generally	

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	

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments
			Table 8, item 9. UE support the Simply Energy request for build packs, use cases and process flows for all CATS transactions. UE note that AEMO advise that this is a matter for the readiness and systems working group and would be worthwhile to ensure that participants all have the same understanding of the processes and services work. It would be useful for this to be available as early as possible to ensure that our design and build decisions are consistent with the build pack and processes.