METERING COMPETITION

EMBEDDED NETWORKS

METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant****: EnergyAustralia*

***Completion Date****: 21th July 2016*

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# General Comments

**Acknowledgement and thank you**

***EnergyAustralia would like to thank the collective efforts of industry participants who discussed and provided feedback to the review of these procedures on the workshop held Monday 18th July.  Within our submission we have used comments from the working responses which were kindly distributed by AGL following Monday’s workshop to reiterate our support for the agreement reached at this meeting.***

| **Reference** | **Comment** |
| --- | --- |
| General | **Document Control and Formatting of Draft Procedures**   1. The draft procedures released for stage 2 appear to be based on changes made to the draft procedures released for stage 1, rather than being the current authorised procedures being consulted on.   This means that it is unclear exactly what changes are being made to procedures and has made comparison and feedback on the procedure changes substantially difficult.  EA see this as concerning as it means that the consultation process may be flawed and that consideration is not being duly given to changes between the current procedures to the proposed new procedures.   1. It’s been difficult to cross reference procedures due to formatting and heading changes between. |
| General | **Documents in Scope for Consultation**  It would be great to get some clarity about the documents are covered by consultation processes. Impact of changing procedures without consultation could create substantial inefficiencies across industry.  For instance, AEMO has stated that changes to the Glossary and Framework will not be subject to the Rules Consultation Process under NER Chapter 10. Changes to definitions are subject to the individual Procedures requirements. (Appendix A – Table 9-12, p1, Row 8)  Definitions can have significant impact on compliance and process and are fundamental to the various procedures.  The Glossary is integral to the procedures which it supports, and therefore we believe it must be consulted on prior to any change. EA requests that either the Glossary is specifically identified as a document to be consulted on or that the definitions are returned to the procedures where they will be dealt with during consultation. |
| General | **Program Plan and Forums**  EA acknowledges that this is a very complicated set of changes and places and it places a lot of stain on all market participants. We are pleased with the consultative forum and the plan that was circulated regarding the overall program plan of PoC. |
| General | **Embedded Networks**  Our business has suggested that industry templates/responses be created that maintain key pieces of information that will assist with Embedded Networks connection processes (SMP processes will need to address this) |
| General | **CATS Procedures – Include Workflows**  Suggest to include workflows / process flows for transactions to illustrate the requirements and timings for common scenarios (i.e. similar to Gas industry documentation). |
| General | **References to RP Role**  Throughout the CATS procedure there is reference to ‘RP’ Role, particularly in tables (I understand that this is because the MC Role will still be titled RP in MSATS but it actually means Metering Coordinator). I do think there is benefit in updating MSATS to reflect the MC role as something more meaningful in MSATS (i.e. MC and not RP). A change like this will assist participants (existing and new ones) in understanding the procedures purely because the codes can be more explicit and reflects the language and roles the market will begin to use. |

***Feedback on Draft Report and Determination***

| **Reference** | **Comment** |
| --- | --- |
| 4.3 | **Embedded Network NMIs**  The whole purpose of creating new Embedded Network NMIs was to identify EN children separately from the network; so abolishing the LNSP NMI and creating an EN NMI seems appropriate and will ensure that child NMI is clearly identifiable. |
| 4.4.3 | **Metering Installation Identification**  AEMO notes that the MC is required to maintain records outside MSATS for the installation of Type 4A meters. Customers can opt out – either to the FRMP or the MC as described in the NER.  The customer Churn rules enable an MC to churn at the same time as the retail churn, provided the meter is not churned, which means that it is quite possible that at some time in the future – a new FRMP or MC may churn the meter to a type 4 against the customer wishes.  It is not acceptable that something so critical is not recorded globally such that it becomes part of NMI discovery, as this will have a large impact on possible contracts which may be available to the customer and likely lead to substantial customer complaints.  Information like this will be crucial in developing procedures regarding reversion of 4A to 4 (and vice a versa). |
| 4.7.3 Reducing Objection Logging Period | **Change to Objection Logging Period**  In relation to the multiple references in the CATS procedure regarding Objection logging period and in AEMO’s Draft Report, EA asserts that we do not support reducing the obligations logging period to 1 business day.  AEMO has stated that it could not find a compelling argument to maintain the existing Objection Logging Period and can only point to a study which showed that 92 % of Objections were logged within 1 business day. We suspect objections logged in 1 business day is due to participants having an automatic rule in their systems to raise objections. If this is the case, the data used to form this decision to reduce the objection logging period is problematic and shouldn’t be used as a basis for the decision.  Furthermore, we believe the draft decision should be rejected as:   1. There is no obligation arising from the Rule changes for amend the Objection Logging Period and questions the basis for AEMO’s considering this change in amending these procedures, as AEMO has stated that the basis for all changes are those directly related to the Metering Competition Rule Change; 2. AEMO has not undertaken a review of CRs that are reviewed by industry, but which do not lead to an objection being raised, to determine the number and time required for these CRs to be reviewed; 3. Industry parties who have reviewed this change have indicated that there are substantial costs associated with the reduction to 1 business day; 4. There has been no cost –benefit for making this change. |
| 4.8.3 | **Network Tariff Codes**  EA does not agree that the Network Tariff Code (NTC) should be a mandatory field for the MP to update in MSATS as the MP my not necessarily have the NTC. We are supportive of this field being optional.  EA does not think that updating a Market System with information that can create ‘inefficiencies in the market’ is best suited to be obligations in agreements. A better market outcome would be to ensure the owner of the NTC (i.e. the Network) is responsible for maintenance or this information. |

# Glossary and Framework

*Please delete any rows where there are no participant comments*

| Clause | Heading | Glossary | | |
| --- | --- | --- | --- | --- |
| Metering Competition | Embedded Networks | Meter Replacement Processes |
| 1.1 | Purpose and Scope | EA strongly supports the position that any changes to the Glossary are consulted on as the Glossary is an integral part of all the procedures (which is aligned with other industry participants views on this matter) |  |  |
|  | Final reading | Definition is incomplete  Final reading refers to either a termination of a contract between an end user and a retailer or a change in metering equipment at a metering installation.  Current example assumes end user changing retailer, whereas it is possible to have the retailer remaining and the end user changing. |  |  |
|  | FRMP | What is an “MSGA” ? Please include in definitions if relevant. |  |  |
|  | MDFF | Review definition  MDFF can be provided to registered participants and other parties (see MDP Procedure) Suggest this be defines as a format for delivering metering data, as there are other formats |  |  |
|  | MDM Procedures | Suggest expanding the definition so that it provides context on what the purpose of this document is. At the moment it only expands on the acronym  E.g. AEMO document: Meter Data Management Procedures |  |  |

# Meter Data File Format

*Please delete any rows where there are no participant comments*

| **Clause** | **Heading** | MDF | | |
| --- | --- | --- | --- | --- |
| **Metering Competition** | **Embedded Networks** | **Meter Replacement Processes** |
| 3.3.4 | Index Read | EA believes that this rule should be amended to require index reads for type 4 as well as 4A and 5 (refer to Cl25(y) of the Energy Retail Code of Victoria). |  |  |
| General | Forward Estimate | It appears that there has been a change of Terminology in that Forward Estimate has become “Estimation”. This is problematic as the type of estimate is important (and the glossary indicates that estimation includes ‘forward estimates’) |  |  |

# Metrology Procedure: Part A

*Please delete any rows where there are no participant comments*

| **Clause** | **Heading** | Metrology Part A | | |
| --- | --- | --- | --- | --- |
| **Metering Competition** | **Embedded Networks** | **Meter Replacement Processes** |
| 4.6 | Grandfathering | Suggest to include any rules regarding the grandfathering of VICAMI /Type 5 meters |  |  |
| 13.2 | Metering Data Collection | For *metering installations* that do not have *remote acquisition*, and where the MC is not a TNSP,  Should this be LNSP (i.e. the default MC?)? |  |  |
| 14 | EMERGENCY PRIORITY PROCEDURES | Given this related to how emergency jobs should be prioritised EA believes it would be beneficial to specify the actions and timeframes |  |  |
| 14.1 | Criteria for determining Emergency Condition | EA believes that this section can benefit from being more explicit which what the criteria must contain given that minimum emergency criteria should not be left to agreements but rather, standard market guidelines.  Suggested reword of the last part of the paragraph is  “AEMO expects the definition must account for the following criteria” |  |  |

# Metrology Procedure: Part B

*Please delete any rows where there are no participant comments*

| **Clause** | **Heading** | Metrology Part B | | |
| --- | --- | --- | --- | --- |
| Metering Competition | Embedded Networks | Meter Replacement Processes |
| 2.3. | Estimation requirement | Clause 2.3(a):  Minor typo… remove ‘e’ NSRDe |  |  |
| 12.1.2 | Unmetered Devices | This section states that the only market loads where there are unmetered devices include street lights and traffic lights.  With NBN being rolled out I thought that part of their infrastructure required Unmetered supply too? |  |  |

# MSATS Procedures: CATS Procedure Principles and Obligations

*Please delete any rows where there are no participant comments*

| **Clause** | **Heading** | MSATS CATS | | |
| --- | --- | --- | --- | --- |
| **Metering Competition** | **Embedded Networks** | **Meter Replacement Processes** |
| 2.10 | EMBEDDED NETWORK MANAGER |  | How is ‘consent from a retailer’ captured as mandatory information?  If this statement is to ensure that the ENM has a process and method of capturing the EIC this should be spelled out, currently it reads as though the consent can be captured as mandatory information. |  |
| 4.11.3 | STATUS CODES (NMI AND DATASTREAM)  (**Meter Register Status Codes)** | In reference to this sentence…  *b) The only Meter Register Codes are C and R, as defined in Table 4-10.*  Meter Register Code ‘D’ is missing (this has been added to the table 4-10) |  |  |
| 4.12 | METERING INSTALLATION TYPE CODES | In the table 4-12, VICAMI code references ‘Clause 9.9C of the NER’. This clause from the NER expires in December2017.  Given 9.9C expires when this procedure takes effect, EA questions whether this appropriate to include in the CATS procedure. |  |  |
| 4.18 | EMBEDDED NETWORK CODES AND RULES |  | Document No “MT\_GN1710v0xx.doc – Allocation of Embedded Network Codes” is referenced.  Is this document in scope of review as part of PoC? |  |
| 7. | AEMO BULK CHANGE TOOL | Response template becomes inconsistent from this point (see item 2 in our General Comments under heading of Document Control and Formatting of Draft Procedures) |  |  |
| 8.4 | FRMP Requirements | Clause (d):  Replace ‘New Retailer’ with ‘New FRMP’ |  |  |
| 8.5 | MDP Requirements | Please confirm whether this clause is meant to cover manually read meters Clause (h) (iv);  (as the only type of meters not requiring a meter reading are type 7). |  |  |
| 8.8 | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 9.6 | Timeframe Rules | In respect to “**Error! Reference source not found” , p**lease update reference. |  |  |
| 10.7 | Timeframe Rules | Please see General Feedback Re: Objection rules |  |  |
| 11.2 | CONDITIONS PRECEDENT | The MC may also change the MP / MDP, not just the FRMP. |  |  |
| 11.6 | OBJECTION RULES | Please see General Feedback Re: Objection rules. |  |  |
| 12.4 | LNSP Requirements | This section should all be section 11.  Furthermore, there are potentially some mandatory information under 11.4c that the LNSP will not be aware of upon being asked to raise this (i.e. MPB, RP,MDP etc) if the customer has approached the LNSP direct as per 5a of the NER. |  |  |
| 44.2 | PARTICIPANT | There is a reference link broken here, i.e.  (a) In accordance with Jurisdictional requirements, a Participant may seek access to *NMI Standing Data* from MSATS as set out in accordance with section 0 for the purpose of identifying the *NMI* attributes characters assigned to a *connection point* or as otherwise permitted by the Jurisdiction. |  |  |
| 44.3 | Request a NMI Discovery Search | There is a reference link broken here, i.e.  (b) NMI Discovery Search 1 is used by a Participant to identify the *NMI* characters that have been assigned to an End User’s *connection point*, as described in section 0. |  |  |

# MSATS Procedures: MDM Procedures

*Please delete any rows where there are no participant comments*

| **Clause** | **Heading** | MDM Procedures | | |
| --- | --- | --- | --- | --- |
| **Metering Competition** | **Embedded Networks** | **Meter Replacement Processes** |
| 9.2 | Report Outlines | Metering Coordinators should have access to a bulk of these reports to assist with monitoring performance of their contracted metering parties |  |  |
|  | MDM RM9 | MC (or RP) should have access to this report to manage the quality control of their MDP |  |  |
|  | MDM RM11 | MC should have access to this report to manage the quality control of their MDP |  |  |
|  | MDM RM16 | MC should have access to this report to manage their responsibility for the provision of data by the MDP |  |  |
|  | MDM RM17 | MC should have access to this report to manage their responsibility for the provision of data by the MDP |  |  |
|  | MDM RM18 | This report is required with the MC as one of the output variables |  |  |
|  | MDM RM22 | MC should have access to this report to manage their responsibility for the provision of data by the MDP |  |  |
|  | MDM RM 26 | MC should have access to this report to manage their responsibility for the provision of data by the MDP |  |  |

# MSATS Procedures: Procedure for the Management of WIGS NMIs

*Please delete any rows where there are no participant comments*

| **Clause** | **Heading** | MSATS WIGS | | |
| --- | --- | --- | --- | --- |
| **Metering Competition** | **Embedded Networks** | **Meter Replacement Processes** |
| 6.7. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 7.6. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 8.6. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 9.6. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 17.6. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 18.6. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 19.7. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 20.6. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 21.6. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 24.6. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 26.6. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 27.6. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 28.6. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 30.4. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |
| 31.4. | Objection Rules | Please see General Feedback Re: Objection rules. |  |  |

# NEM RoLR Process Part A and B – MSATS Procedure: RoLR Procedures

*Please delete any rows where there are no participant comments*

| **Clause** | **Heading** | NEM RoLR | | |
| --- | --- | --- | --- | --- |
| **Metering Competition** | **Embedded Networks** | **Meter Replacement Processes** |
|  | General | This procedure does not include the outcome of the MC failing  There is an AER consultation on splitting suspension of parties with multiple registration. |  |  |
| 2 | Summary of ROLR Processes | How will the rules account for Review for MC/MP/MDP obligations when the RoLR has not contracted the MC? |  |  |

# NMI Standing Data Schedule

*Please delete any rows where there are no participant comments*

| **Clause** | **Heading** | NMI Standing Data | | |
| --- | --- | --- | --- | --- |
| **Metering Competition** | **Embedded Networks** | **Meter Replacement Processes** |
|  |  |  |  |  |

# Service Level Procedures for MDP

*Please delete any rows where there are no participant comments*

| **Clause** | **Heading** | MDP SLP | | |
| --- | --- | --- | --- | --- |
| **Metering Competition** | **Embedded Networks** | **Meter Replacement Processes** |
| 2.1 | Metering data services |  | Include ENM in  (f) co-operate in good faith with *AEMO*, all *Registered Participants,* MPs and MDPs*;* |  |
| 3.12(a) |  |  | As Above |  |

# Service Level Procedures for MP

*Please delete any rows where there are no participant comments*

| **Clause** |  |  | | |
| --- | --- | --- | --- | --- |
| **Metering Competition** | **Embedded Networks** | **Meter Replacement Processes** |
|  |  |  |  |  |

# Other Issues Related to Consultation Subject Matter

| **Document** | **Clause** | **Heading** | EA |
| --- | --- | --- | --- |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |