METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

FIRST STAGE RESPONSE

***Participant**: Red/Lumo Energy*

***Completion Date**: 15 November 2016*

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1. Glossary and Framework

Please delete any rows where there are no particpant comments

(note: only sections that have changed as part of Work package 2 are listed in the table below)

Clause	Heading	Participant Comments
		At this time, Red and Lumo have no comments on the Glossary and Framework.

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

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
2	BREACH OF THE NER OR PROCEDURES UNDER THE NER	Red and Lumo would like to understand whether AEMO are imposing any self-reporting requirements n MP, MDP, ENM and MCs?
5.3	Organisation Structure	Red and Lumo would like to understand how will AEMO determine and the relevance of the following clause: (c) Availability of appropriately skilled and knowledgeable personnel.
7.2	Constraints	Red and Lumo question how AEMO will know whether the limitations placed on providers are met given some data is unavailable (such as whether a site is

		3PH)? (b) limiting the types of activities that can be undertaken under an accreditation category (such as 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);
8.2	MC	Red and Lumo would like to understand how quickly AEMO expects retailers to appoint a new MC? Additionally, how will AEMO know where a large customer has appointed an MC? (a) Where AEMO has issued a notice to the FRMP under section 6.1.2, the FRMP for each affected *connection point* must appoint a new MC under clause 7.7.1(a) of the NER (b) Where AEMO has issued a notice under section 6.1.2 to a person other than the FRMP, that person must appoint a new MC within two business days of receiving the notice, otherwise the FRMP must appoint the new MC.

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
3.2	Contents	Red and Lumo query whether AEMO require planned shutdown or outage periods for small customers. We recommend that clause (e) is redrafted to be specific that the recitification plan has considered the impacts on customers and the planned outage requirements that are placed on distributors and/or retailers for the interruption of a customer (see new NERR 59C as example).
APPENDIX A	APPLICATION FOR EXEMPTION	15. Draft MP rectification plan? In relation to the above question, is AEMO seeking a response of 'Yes or No' only?

4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
		Red and Lumo would prefer that the Procedural elements of this document are included in the MSATS Procedure, consistent with the initial intent under the proposed framework, with the examples sitting in a guide for reference. As currently drafted, we have no concerns regarding the content of this Procedure.

5. Qualification Procedure

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
3.3	Application Fees	Red and Lumo suggests that the application fee process should be consistent with the fee structure of other applications made with AEMO. AEMO has been accrediting MPs and MDPs for a while now and should be able to come up with a median cost, which can be published in the Fee Structure, similar to all other participant categories. This will reduce any perceived barriers to entry.

3.4	Queuing Policy	Red and Lumo requests AEMO to elaborate on how the level of responsiveness will be measured in the following statements: The applicants' responsiveness when addressing requests for further information or re-submission of responses to Accreditation Checklists will be taken into consideration when AEMO is required to assess more than one application at a time. AEMO will prioritise its assessment of each application on the basis of the responsiveness demonstrated by each applicant in its pursuit of accreditation and registration, especially when AEMO has sought further information or required applicants to review and update their responses to an Accreditation Checklist.
3.5.1	Inadequate Responses or Missing Information	How will this clause be considered in respect to clause 3.4 Queuing policy?
3.5.2	Application in Abeyance	How will this clause be considered in respect to clause 3.4 Queuing policy?

6. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
3.1	Systems and Interface Requirements	Red and Lumo query whether an ENM must have a connection to the B2B e-HUB? Each ENM must establish and maintain systems and business interfaces to: (i) MSATS for the management of *child connection point* creation, updates, notifications, objections, reports, and relevant CATS Standing Data; (ii) the *B2B e-Hub* for the interface with *B2B Participants*; and (iii) other technologies for the general management of information and alternative delivery of information to *Registered Participants*, MDPs, MPs and other ENMs.
4.1	NMI Allocation	Indicative TNI Codes for the parent connection point is available to the ENM through the MSATS C1 report. The above statement appears after (d), should this be included in this section as (e) or removed? A similar statement has been included in 4.2.1 (d) Indicative DLF Codes and TNI Codes for the *parent connection point* are available to the ENM through the MSATS C1 report

7. Unmetered Load Guideline

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
		Red and Lumo have no comments on this Procedure.

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments
			Red and Lumo have no other comments at this time.