METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Energex Limited*

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
4	MSATS Codes	Energex recommends that this section is moved to the front of the document so that these concepts are understood before the document is read in detail.

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

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
3	DETERMINATION OF TYPE OF BREACH	Energex recommends that consideration is given to amending the current breach hierarchy from "immaterial, significant and material" to a hierarchy that is more intuitive such as "immaterial, material, significant and critical". In addition, each level in the hierarchy should have impact assessment criteria to allow participants to determine where they sit on the scale. Assessment criteria could include the following: – Number of customers impacted – less than 40 GWh pa – Number of customers impacted – greater than 40 GWh pa – Cost implications for affected participants – Timing impacts on customers and market participants – Impacts on wholesale market and settlement – Impacts on customer services such as billing, service works, metering, etc. Examples for "immaterial" and "critical" are as follows: Immaterial: – Number of customers impacted – Less than 40 GWh pa: less than 1000 – Number of customers impacted – Greater than 40 GWh pa: less than 10 – Cost implications to affected participants: less than $10000 – Timing impacts on customers and market participants: Short-term, less than 7 days

		– Impacts on wholesale market and settlement: No impacts – Impacts on customer services such as billing, service works, metering etc.: Breach of obligation dates Critical – Number of customers impacted – Less than 40 GWh pa: More than 100,000 – Number of customers impacted – Greater than 40 GWh pa: More than 1000 – Cost implications to affected participants: Greater than $1M – Timing impacts on customers and market participants: Indefinite – Impacts on wholesale market and settlement: Unable to provide settlement information – Impacts on customer services such as billing, service works, metering etc.: No customer billing for indefinite period
3.1	Immaterial Breach	Refer above.
3.2	Significant Breach	Refer above.
3.3	Material Breach	Refer above.
4	ISSUE OF BREACH NOTICE	In the case of significant and critical breaches, in addition to issuing breach notices to the breaching participant, AEMO should also notify impacted parties, including the DNSP, MC, ENO, Large Customer, etc. Impacted parties need to be fully aware of breaches, so that they can make alternative arrangements and be involved in any remediation plans and timings. Energex also considers that unsafe work practices should be included as a reason for issuing a breach notice.

5	REVIEW OF CAPABILITY FOR ONGOING COMPLIANCE	It is noted that an MP, MDP, ENM or MC has 7 days within which to remedy a breach. Energex considers that this 7 day period should be utilised by the participant to develop the remediation plan and contact impacted participants required to assist in recovery efforts. This plan will also assist AEMO in its assessment of the participant's capability for ongoing compliance.
5.1	Remediation Plan	The current drafting states that "AEMO may take the remediation plan into account" but there is no reference to impacted participants. Energex considers that impacted participants, such as the DNSP, should be fully aware of and agree to any remediation plan as it is likely that impacted participants will be required to assist the MP, MCP, ENM or MC in its recovery efforts and in managing alternative plans to fully implement the remediation.
6.2.3	Escalation	Where AEMO escalates the severity of a breach, it is important that impacted participants should also be notified in a timely manner so that appropriate action can be taken.
8.2	MC	8.2.(a) – If the defaulting MC was chosen by a Large Customer, the FRMP would need to provide the Large Customer with the opportunity to select a new MC. 8.2(b) – It is unclear how AEMO will know which NMIs have Large Customer appointed MCs.
9.1.1	Embedded Network Manager	Consideration has not been given to embedded child NMIs affected by the deregistration of their parent NMI MP, MDP or ENM. The child NMI, customer, MP, MDP could all be compliant but will be impacted by the deregistration (and any disconnection of supply).

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
General comment: The term "Current MC" used in the draft procedure is cumbersome and unnecessary and the qualifier "Current" has not been applied to other roles, such as MP. It should be understood that MC refers to the Current MC or, if required, qualifiers should also be used for Old MC and Prospective (or New) MC.		
2.1	Applicant	Faulty Type 5/6 metering installations cannot be replaced by a DNSP MC under the new Rules. The FRMP must be notified and the FRMP will select a new MC to replace the metering installation. However, in the draft procedure, the new MC cannot apply for an exemption, only the Current MC. The Current MC is held accountable and responsible for the faulty installation but has no control of the rectification plan, process or timing. In this case, the prospective or new MC should apply to AEMO for the exemption and be held accountable for completion and compliance.
2.5	Grant of Exemption	There was confusion about the commencement date of an exemption at the workshop held on 25 October 2016. The draft procedure states that it will commence on the date AEMO received the application, but AEMO commented it would only commence when approved and could not be made retrospective. This situation would leave MCs liable for breaches for an unknown period while waiting for approval. MCs would also need to seek a letter of "no action" from the AER to cover the approval period. Energex therefore seeks confirmation that the exemption will commence on the date the application is received by AEMO as per the draft procedure.

4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no particpant comments

No comments.

5. Qualification Procedure

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
Overall comment: At times, there is some confusion for existing accredited participants when undertaking system and process works that have an impact on market systems, such as an upgrade to the market gateway. For example, it is unclear whether this situation requires a notification to AEMO only, a notification with proof of testing against pre-production environments, a round of review by external parties either before go-live or at the next scheduled accreditation review, etc. Energex suggests that AEMO should insert a section providing some broad scenarios, such as replacement of Meter Data Management system, replacement of market gateway, replacement of meter reading systems, etc and a list of the associated requirements for participants. A formal notification template should also be included to allow the initial notification to be made in a structured manner.		
2.1	Mandatory Requirement	Life support notification responsibility needs to be detailed in this procedure for either the ENO and/or ENM in addition to the FRMP.
3.5.2	Application in Abeyance	Clarification is required as to whether any remaining application fee deposit will be refunded by AEMO if an application is withdrawn or is deemed to have been withdrawn.
5	RE-ACCREDITATION AND REGISTRATION	Clarification is required as to whether re-accreditation will be subject to the same application fee deposit of $5,000.

6. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no particpant comments

No comments.

7. Unmetered Load Guideline

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
4.1	Generally	Section 4.1(j) has been amended from: "Formal acceptance to use the Unmetered Device from at least one LNSP. Formal confirmation supporting the installation of the Unmetered Device (such as a letter from a person proposing to use the Unmetered Device)." to: "Formal confirmation supporting the installation and use of the Unmetered Device (such as a letter from a person proposing to use the Unmetered Device or an LNSP)." As an LNSP, Energex would prefer that the wording should revert back to the previous version where at least one LNSP must formally accept the use of the unmetered device. This would prevent a manufacturer from having a device registered that is unlikely to be supported by LNSPs.

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments
Energex supports Ergon's recommendations for amendment to the Exemption Guideline - Small Customer Metering Installation.			