METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *CitiPower/Powercor*

Completion Date: *15/11/16*

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1. Glossary and Framework

Please delete any rows where there are no participant comments

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

Clause	Heading	Participant Comments
3	Glossary Term: HV	Like definition for LV should be stated as "*A Voltage equal or greater than 1kV*."

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

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
3	DETERMINATION OF TYPE OF BREACH	CitiPower Powercor seeks greater understanding of the levels of impact for an: • Immaterial • Significant • Material Breach The procedure provides no guidance on how AEMO or a participant would assess what constitutes a non-material breach through to a material breach. There is no gauge on cost of service, number of customers impacted, cost to affected participant etc. The table/criteria could indicate: • Number of customers affected • Cost to affected participants • Impact on Customers • Impact on wholesale market • Impact on customer billing Will these be scaled against Major, Minor or Incidental non-compliances identified in AEMO audits? Or conversely, have a relationship with AER civil penalties.
5.2	Past Conduct	CitiPower and Powercor suggest adding: *"(e) Any AER civil penalties imposed on relevant MP, MDP, ENM or MC."*

Clause	Heading	Participant Comments
6	AEMO ACTION FOLLOWING REVIEW	Will the focus and scheduling of future audits change as a result of a breach?

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
2.5	Grant of Exemption	CitiPower Powercor strongly believes there should be an obligation to ensure affected parties, in particular those are not contracted to the MC, but which are financially affected, be kept informed of the situation.
2.7	Extension to Exemption	CitiPower Powercor strongly believes there should be an obligation to ensure affected parties, in particular those are not contracted to the MC, but which are financially affected, be kept informed of the situation.

4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
2	ALLOCATION AND ISSUE OF NMIS	When will AEMO publish the new NMI allocation blocks for ENMs and any consequent changes to LNSP NMI block allocation? CitiPower Powercor suggest block allocation by AEMO to the ENM on first request by the ENM of a new child NMI and that AEMO publish to the market the new allocation spreadsheet within 2 business days of providing the NMI block to the ENM. The industry has a strongly established process where LNSP's are assigned uniquely identifieable NMI's. it should remain the case, easily identifiable in MSATS, long established process where starting characters are geographivclly indetifiable, ENM NMI's will be a minority, small number.
2.1	NMI Allocation by AEMO	CitiPower Powercor views that the NMI allocation to the ENM should be such that, a NMI or block of NMIs bear no resemblance to those of the LNSP. CitiPower Powercor suggests this clause be re-written to provide the industry clarity and ensure these ENM NMI'are clearly identifiable.

Clause	Heading	Participant Comments
2.2	Issue of NMIs by LNSPs and ENMs	CitiPower Powercor proposes modifying clause 2.2 (a) (ii) as follows: "The ENM must apply to AEMO for NMI prior to assuming responsibility for the child connection point. AEMO will ~~either~~ issue a NMI to the ENM for that child connection point from the ENM's allocated list ~~or a unique NMI from an available range~~." CitiPower Powercor views that the NMI allocation to the ENM should be such that, a NMI or block of NMIs bear no resemblance to those of the LNSP.

Clause	Heading	Participant Comments
10	NMI RULES	CitiPower Powercor has substantial concerns about the implementation of this rule, which would require a network NMI becoming an embedded network NMI and an embedded network NMI becoming a network NMI. CitiPower Powercor believes that in general, NMIs should be abolished rather than having them move between LNSP responsibility and ENM responsibility for the following reasons: 1. Costs of implementing changes to network system validations; and 2. Movement of a NMI between connection points. 1. Cost of changing network system validations The implementation of the Embedded Network Manager was predicated on providing a clear management and responsibility for managing NMIs relating to Embedded Networks. The proposed requirement of having NMIs move between DNSPs and ENMs will require the DNSPs to implement significant system changes to ensure they can validate the small number of unique NMIs which may move from the ENM back to the responsibility of the LNSP. There is no specific rule which requires NMIs to be maintained across DNSPs and ENMs. CitiPower Powercor has already conducted a high level cost benefit analysis and the IT system changes alone would result in significant investment and for such a small number of NMIs would not be practicable. CitiPower Powercor therefore proposes that this obligation be removed. If NMIs move between DNSPs and ENMs then CitiPower Powercor believes they should be made extinct and new NMIs created.

Clause	Heading	Participant Comments
		2. Movement of a NMI between connection points In clause 1.1 AEMO has stated that: The *NMI* is a unique identifier for each *connection point* When a NMI is no longer connected to the LNSP network, but rather is supplied through the Embedded Network parent connection point or vice versa, it would be reasonable to argue that a connection point has changed, which supports Rule 1: *A NMI cannot be changed or reallocated to another connection point* As such, CitiPower Powercor believes that it is more appropriate for NMIs which move between an embedded network and a DNSP to be extinguished thus ensuring clarity of the NMI connection and closure of all associated roles. In the example of the Builders Temporary Supply where we create a NMI which is then abolished once the permanent structure is in place and then ceate a new NMI. The location of both NMI's is at the same site. This process service the market well.
12.2	One End User, multiple metered on the secondary side of transformer	This scenario could change over time into 12.12 and back (i.e. a multi floor commercial high rise can transition from 1 tenant to many tenants over time regardless of the initial NMI and metering arrangements). Per AER guidelines, NMI aggregation and disaggregation over time should be supported by this Procedure.

Clause	Heading	Participant Comments
12.12	Multiple End Users, High rise building	This scenario could change over time into 12.2 and back. (i.e. a multi floor commercial high rise can transition from 1 tenant to many tenants over time regardless of the initial NMI and metering arrangements). Per AER guidelines, NMI aggregation and disaggregation over time should be supported by this Procedure.