METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

POC PROCEDURES CONSULTATION (PACKAGE 2)

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: AusNet Services*

***Completion Date**: 16 Jan 2017*

Table of Contents

1. Glossary and Framework 3
2. Default & Deregistration Procedure (MP, MDP, ENM, MC) 3
3. Exemption Procedure (Metering Installation Malfunctions) 6
4. MSATS Procedures: National Metering Identifier 6
5. Qualification Procedure 8
6. Service Level Procedure – Embedded Network Manager 8
7. Unmetered Load Guideline 9
8. Other Issues Related to Consultation Subject Matter 9

1. Glossary and Framework

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

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Clause	Heading	Participant Comments
1.1	Purpose and Scope	AusNet Services recommends that it should be clear that Default and Deregistration Procedure applies from 1 Dec 2017 and the old Compliance, Assessment and Deregistration Procedures no longer apply from 1 Dec 2017.
3.1	Issue of Breach Notice	AusNet Services notes the previous submissions by a number of Participants requesting a breach classification framework and AEMO's response that it provides sufficient flexibility to address breaches on a case-by-case basis. It is to this very point of flexibility that creates unnecessary risk for Registered Participants. To resolve this uncertainty we recommend adding a statement that AEMO's assessment is auditable and subject to regular audits and quality reviews. Given AEMO's powers under the 7.4 of the NER this proportionately reflects the materiel impact of a deregistration or a breach would have on a business.

3.3	Determination of Type of Breach	Previously AusNet Services noted that condition 3.3(d) is unclear and should be removed. The Procedure refers to what AEMO reasonably considers unethical, but does not specify what ethical framework that AEMO might apply. It seems a participant can be compliant under the Rules and be in a Material Breach just because AEMO reasonably considers it being "unethical". Further to this point, it is all the more important because the NER in section 7.4 gives AEMO discretion in making the Breach assessment. Clause 3.3(d) gives AEMO too much discretion. It is the role of the Rules and Procedures to provide certainty to what is acceptable and not AEMO's ethical framework. AEMO's response asked for examples. 1. Scenario #1. Metering contestability results in lots of meters being disposed of. The society of the day sees the early disposal of long life assets as ethically wrong and AEMO starts breaching metering providers for not re-using assets. 2. Scenario #2. MDPs start offering services to provide more preferential substitution rules to the customer if the customer pays more for the service. These MDPs may have invested substantially in building this capability. Although the MDP has not broken any Rules or Procedures, and Market Settlements are by the different estimation process, competitors who are not doing the same practice may argue this is not within the spirit of the Rules, and AEMO's ethical framework may be sympathetic to their plight, until the public starts supporting this practice (similar to when Uber started competing with Taxis).

		We suggest changing these words to conduct associated with illegal activity or put the safety of the community at risk. This would strike the right balance and protect customers from MDPs from sharing metering data with house burglars and from unsafe metering maintenance without making an ethical judgement.
5.1	MP, MDP or ENM	AusNet Services notes that AEMO had agreed that the impacted LNSP would be a notified party of a breach. However, that is only after AEMO makes a determination do the impacted parties get notified. This could take too long. As such, we recommend adding a provision that states where AEMO will notify impacted parties when AEMO reasonably considers that the impacted parties have not been notified within 10 businesses by the party in breach.

3. Exemption Procedure (Metering Installation Malfunctions)

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Clause	Heading	Participant Comments

4. MSATS Procedures: National Metering Identifier

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Clause	Heading	Participant Comments
9.2	NMI Decommissioning	AusNet Services does 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, when using the Code of X will suffice. Customers seeking data for abolished NMIs can still request it even if the NMI is extinct. They should be able to find an old bill to provide the NMI to either the DNSP or retailer. We consider adding a new status code coming in round 3 consultation is too late for implementing the required system change. _____ AusNet Services considers if AEMO support making the LNSP NMIs

		extinct when they become child NMIs 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 has been removed; ~~(v) a connection point directly connected to the LNSP's network becomes a child connection point;~~ (v) 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

5. Qualification Procedure

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6. Service Level Procedure – Embedded Network Manager

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Clause	Heading	Participant Comments
4.1	NMI Allocation	AusNet Services recommends expanding section 4.1 to cater for all of these situations relating to EN formation and NMI allocation, especially for situations where an off market child who has an existing connection with no NMI.

7. Unmetered Load Guideline

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Clause	Heading	Participant Comments
1	INTRODUCTION	

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments