DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK

METER CHURN PACKAGE

***Participant**: AusNet Services*

***Completion Date**: 24 October 2014*

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A. PROPOSED CHANGES TO THE METER CHURN PACKAGE 3

1. Proposed Changes

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NOTE: No proposed changes have been populated please refer to mapping documents and change marked procedures. Please complete where necessary

Please include your comments in the 'Participant Comment' column below.

A. Proposed Changes to the Meter Churn Package

Item	Description	Category	Participant Comments
1	**PROPOSED/ REQUESTED CHANGES**		
	MPB SLP		
1.1	Re 4.8.1 AusNet Services suggests burdening the Metering Provider "to support the requirements of the FRMP Churn Procedure" is unnecessary and should be deleted. The FRMP should have an adequate commercial agreement with the Metering Provider "to support the requirements of the FRMP Churn Procedure". Suggest the following changes are made, noting changes are in red: 4.8.1 The Metering Provider must provide relevant NMI Standing Data and metering register information ~~to support the requirements of the FRMP Churn Procedure.~~	**Procedure only**	Suggest deleting the: "to support the requirements of the FRMP churn procedure"
1.2	4.13.2 b) ~~For a site remaining a type 1, 2, 3 or 4 installation,~~ Verify that there are operational communications with the metering installation and that the communications are of sufficient quality to support the remote acquisition of metering data.	**Procedure only**	Please correct drafting error
1.3	4.14.1 Regulatory obligations for Tasks 3 and 4 are unclear. Is the intention is notify the new or current MDP and RP? If the former the words need to be clarified. If the latter the notification of metering arrangements is part of the commercial arrangement of providing a new meter. Further the example of	**Procedure only**	Please clarify the intention of the obligation and make necessary amendments

	password availability, compatibility issues no longer seem relevant.		
1.4	Tasks 5 and 6 do not make it clear what information is required and from whom. Suggest the meter churn arrangements clarify what information is required by whom. Otherwise the meter churn procedures will not efficiently cater for mass market volumes and meter providers will continue to bother an otherwise unrelated LNSP with information requests. Meter Provider obtains (where necessary): 1. site information from MSATS via a NMI Discovery Type 2; 2. security access information from the current Metering Provider; and 3. customer contact details from the FRMP	**Procedure (and enable access NMI Discovery Type 2 for MDPs)**	Please provide a clarify and consider suggestion
1.5	Suggest the following changes are made to 4.35.1, noting changes are in red: 4.35.1 The Metering Provider must comply with the Rules and all relevant procedures under the Rules and the current: a) AS3000 Wiring Rules; b) ~~ACA Communications Cabling requirements (where applicable);~~ ACMA's Cabler Provider Rules (CPRs) requirements (where applicable); and c) jurisdictional and Network Service Provider requirements.	**Procedure only**	ACA Communications Cabling is no longer relevant
	Meter Churn Procedures for FRMP		
1.6	The proposed wording 1.1.1 does not align with the meter churn definition and would imply the change of a component that does not affect MDFF metering data for example replacing a CT represents meter churn. Suggest the following changes are made, noting changes are in red: 1.1.1 Meter Churn occurs when ~~components of a metering installation~~ one or more meters are changed or altered at a metering installation resulting in a change to the nature of metering that alters the MDFF or MDM metering data file ~~data produced by the metering installation~~. Meter Churn can also	**Procedure only**	Please amend drafting as indicated noting: • 1.1.1 needs to align with the definition in 1.5. • The need to clarify what we mean by a change of the nature of metering. • Remove the reference to components of a

	occur when ~~components of a metering installation are changed and~~ there is also a change of Metering Service Provider(s).		metering installation
1.7	The proposed wording 1.1.2 gives the wrong impression that there are no restrictions to meter churn. Suggest the following changes are made, noting changes are in red: 1.1.2 The responsible person can initiate Meter Churn ~~at any time~~ where allowed by the NER and jurisdictional rules.	**Procedure only**	Please amend the drafting to recognise all metering rules, including jurisdictional rules
1.8	Suggest the following changes are made to 1.5.1, noting changes are in red: 1.5.1 **Meter Churn** - *Meter Churn* occurs where one or more meters are changed or altered at a metering installation resulting in a change to the nature of metering that alters the MDFF or MDM metering data file.	**Procedure only**	Please amend drafting as indicated to clarify what is and what isn't meter churn
1.9	Regarding 3.2.1, who is considered the initiator in this clause the FRMP or the RP? It would be useful to specify the role to aid clarity when the MC changes are made. This will also assist in clarity on which role is providing the data referred to in sub clause (b).	**Procedure only**	Please clarify which role is the initiator FRMP or RP
1.10	Regarding 3.2.1, there should be a need to include an obligation to ensure the initiator continues the honour existing financial obligations to pay the current Meter Service Provider(s) until the change of metering occurs.	**Procedure only**	Please add an obligation for continuity of payment to current Meter Service Provider(s) until the change of metering occurs
1.11	The four diagrams at the end of the document need to be labelled and referenced in the relevant parts of section 3.2.1. In particular, where is the obligation to ensure the Churn Period takes less than or equal to 20 business days? If this is not clear then an obligation should be added.	**Procedure only**	Please add labels to each diagram and reference the diagrams in section 3.2.1
	MDP SLP		
1.12	Glossary definition of Meter Churn should be altered to more clearly clarify what is and what isn't Meter Churn. Suggest the following changes are made, noting changes are in red: *Meter Churn* occurs where one or more meters are changed or altered at a metering installation resulting in a change to the nature of metering that	**Procedure only**	Please amend drafting as indicated to clarify what is and what isn't meter churn

	alters the MDFF or MDM metering data file.		
1.13	Similar comments to above, the proposed wording in 8.1.1 should align to the definition, remove the reference to components of a metering installation and clarify what we mean by a change of the nature of metering. Suggest the following changes are made, noting changes are in red: 8.1.1 Meter Churn occurs when ~~components of a metering installation~~ one or more meters are changed or altered at a metering installation resulting in a change to the nature of metering that alters the MDFF or MDM metering data file ~~data produced by the metering installation~~. Meter Churn can also occur when ~~components of a metering installation are changed and~~ there is also a change of Metering Service Provider(s).	**Procedure only**	Please amend drafting as indicated noting: • 1.1.1 needs to align with the definition in 1.5. • The need to clarify what we mean by a change of the nature of metering. • Remove the reference to components of a metering installation
1.14	8.1.4 (a) ii. the start reading(s) for the new type 1, 2, 3, 4, or 5 metering installation is applied at the start of the day ~~on the day~~ of the Meter Churn;	**Procedure only**	Please correct drafting error for consistency
1.15	Regarding section 9.5 AusNet Services recognises that telecommunications networks represent a critical part of every MDP's business. Therefore, it is appropriate for AEMO to subject telecommunications networks to the same rigours as applied to other MDP systems (and for that matter MPCs that remotely transfer data to backend systems). However, applying obligations on non-public telecommunications networks disproportionately burdens businesses with purpose built infrastructure when the same risks often apply to all telecommunications networks. Accordingly, there is a need to balance these obligations, and remove any heavy handed obligations. Fundamentally, non-public telecommunications networks are now no different from wireless telecommunications products widely available to businesses in the public domain. Previously, dial-up modems supported by phone lines were commonly used for Type 1-4 meters. These phone lines were subject to dozens of telecommunications regulations guaranteeing minimum service levels and standards. Today, meters are supported by 3G and 4G wireless services offered by any number of telecommunications re-sellers and wholesale network providers. Even consumer protections that apply to individual customers of mobile data services do not apply to MDPs	**Procedure only**	Please consider the issues raised with the proposal, and amend the procedures as suggested

	purchasing wholesale services arrangements (often known as M2M arrangements). As such, it is incumbent on every MDP business to negotiate adequate terms and conditions from any telecommunications company (including re-sellers who aggregate bandwidth). Many of the same conditions/risks apply equally to both public and non-public telecommunications networks. Each MDP must negotiate with their telecommunications provider (including Telstra) appropriate terms with regard to security arrangements (e.g. locking cabinets, encrypting VPN traffic), available bandwidth, service availability and disaster recovery. In regards to these aspects there is no difference between public and non-public telecommunication networks, and AEMO has no basis for needing to approve one but not the other. AusNet Services strongly suggest the following changes are made, noting changes are in red and additional reasons are in green: 9.5 ~~Non-public~~ Telecommunications networks ~~9.5.1 The use of a non-public telecommunications network for the collection of metering data by a Metering Data Provider is subject to approval by AEMO.~~ (this clause is overly heavy handed in comparison to other obligations in section 9) 9.5.2 The Metering Data Provider must provide, to the reasonable satisfaction of AEMO, information demonstrating that the use of the ~~non-public~~ telecommunications network enables the Metering Data Provider to meet the requirements of the Rules, metrology procedure: Part A , metrology procedure: Part B and this Service level procedure, which must include, but not be limited to: (a) obtaining and maintaining compliance with ~~the relevant recognised~~ ACMA's technical standards and licensing authority requirements; (ACMA is the technical regulator of telecommunications network in Australia and audits telecommunications networks accordingly) ~~(b) obtaining and maintaining appropriate software licences to operate the non-public telecommunications network;~~ (software licencing in support of		

	telecommunications is a complicated, commercial matter) (c) the implementation and nature of security controls for the ongoing operation and management of the ~~non-public~~ telecommunications network; (d) available bandwidth that supports the collection and management of metering data; (e) disaster recovery provisions related to: i. ~~non-public~~ telecommunications network redundancy; ~~ii. alternative metering data collection arrangements during failure of all or part of the non-public telecommunications network; and~~ (even if a public telecommunication network failed an alternative metering data collection would be required meter data obligations, this could involve manual meter reading via the optical port or a communication module change) iii. ~~time synchronisation of metering installations operated through the non-public telecommunications network.~~ (time synchronisation is a meter issue and not a telecommunications issue and as such it is no different between public and non-public telecommunications networks, and further RPs and MDPs are already subject to obligations to ensure minimum standard of meter time synchronisation) (f) processes for the commissioning of metering installations and provision for commissioning failure management; (g) installation and maintenance of the ~~non-public~~ telecommunications network, including: i. adequate contractual terms with telecommunication service providers; and ~~i. compliance with relevant safety standards and work practices;~~ (ACMA audits this) ~~ii. compliance with telecommunications technical standards~~ (where this impacts spectrum use ACMA audits this)~~; and~~ ~~i~~ii. training and skill requirements of installation and maintenance personnel.		