DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK

METER CHURN PACKAGE

***Participant**: United Energy*

***Completion Date**: 24 Oct 2014*

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1. Proposed Changes

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- SLP Metering Provider Services Category B for Metering Installation Types 1, 2, 3, 4, 5 and 6

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**		
	Meter Churn Procedures for FRMP		
1.1	1.1.1 refers to meter churn as the churn of the components of a metering installation when they are changed or altered (without a change of service provider) and also refers to when components are changed and there is a change of service provider. The change of a CT or the reconfiguration of a meter to have an export stream is not the purpose of this procedure. Suggest the drafting being amended to change of meters and service provider roles at a metering installation in line with the definition in 1.5.1. UE query whether the purpose of this procedure is the DataStream aspects of a change of meter configuration without a role change.	**Procedure only**	Suggest adopting drafting similar to 1.5.1
1.2	1.1.2 The drafting refers to meter churn in line with a B2B request. Suggest that the meter churn request also be in line with the NER, NMP and any jurisdictional instruments. It is misleading to suggest that the B2B request is the only aspect for consideration. The FRMP and RP should comply with all metering rules.	**Procedure only**	Amend the drafting to recognise all metering rules, including jurisdictional rules.
1.3	1.2.2 Suggest that once the rules are rewritten that the relevant references	**Procedure**	UE suggest deleting the clause

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	in this procedure are updated. The rewrite of Chapter 7 may have other impacts in this procedure which will need to be updated eg change of RP to MC etc.	**only**	
1.4	3.1.2 (b) The FRMP must notify the current RP in advance of any alterations to the metering installation. This occurs today in low volumes by email. Is there a one way notification via B2B or an MSATS CR M2B? There needs to be a clear consistent method of the notification referred to in this clause	**IT change**	The drafting should define the agreed process for this prior notification
1.5	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**	Clarify which role is the initiator FRMP or RP
1.6	3.2.1 (b) is the initiating FRMP providing this information via B2B or is the new MP to undertake NMI discovery to retrieve the data. UE note that the instructions on the required change would most likely come from the FRMP	**Procedure only**	
	MP SLP		
1.7	4.8.1 UE suggest that the MP must provide the NMI standing data and meter register information for any metering alteration not just Meter Churn. The addition of 'support the requirements of the FRMP churn procedure" can be deleted. The necessary information should already be in MSATS and be part of the MP obligation to update/maintain in MSATS via the CATS Procedures.	**Procedure only**	Suggest deleting the:' support the requirements of the FRMP churn procedure'
1.8	Fig 1 The method of notification processes in Task 3 and Task 5 should be made clear. Suggest that the meter churn arrangements which currently cater for low volume and manual processes be enhanced to cater for mass market volumes via B2B or build packs for B2M transactions. UE is not clear whether the MDP in task 3 is to the new or current MDP and the new	**IT change**	The method of notification processes in Task 3 and Task 5 should be made clear.

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	or current RP. Also it is not clear that the B2B arrangements apply for this transaction in task 3 and whether B2B is delivered by all competitive MPBs. In task 5 the information should come from MSATS and not the LNSP/current MPB.		
	MDP SLP		
1.9	8.1.1 Similar comments to above, meter churn should refer to the meters and not to other components of the metering installation like CTs	**Procedure only**	Amend the drafting in line with the changes made to Cl 1.1.1 of the Meter Churn Procedures
1.10	8.1.4 (a) (iii) query why there is a need to specify providing estimated data for meter churn situations when the MDP has the obligation to provide a complete set of data for the day anyway. Suggest that the requirement is not just for a new type 5 meter but a type 1-5 meter.	**Procedure only**	Amend drafting to a 'a new type 1-5 metering installation'
1.11	8.1.6 (a) (v) says: where Meter Churn results in a change to the recording of metering data from 30 minute to 15 minute intervals, the 15 minute intervals of metering data from the commissioning of the new metering installation to the end of the Meter Churn day are to be aggregated to form 30 minute interval metering data; The new MDP must request the 30 minute Interval data from the OLD MDP, and then it must combine it with the 15 Minute data from its own meters for the remainder of the Churn day, and create a 30 Minute interval stream to publish to Market participants. However the very next day the MDP has a full day of 15 minute data and now publishes that data stream as 15 Minute data. This means that the Systems for the MDP, LNSP and FRMP must be designed to hold data at both 30 and 15 minute intervals for the same Datastream – This will in all likelihood be expensive to build and test (and it is likely that very parties do it properly now)- Why can't more practical, if slightly less accurate approach be adopted for this situation – where the churn data is converted to 15 Minutes by a simple process of halving the 30 minute readings. Considering that UE tariffs (and most likely	**IT change**	AEMO should consider the capability of all parties to meet the clause as currently drafted. UE strongly recommend that a simpler approach be adopted to save on unnecessary cost increases. The data stream from a meter should not vary on the churn day to the next day ie from the 30 min data to 15 min data the following day.

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	other tariffs) are based on 30 Minute intervals and that AEMO Settlement is in 30 minute intervals – There ought to be no difference from a financial transaction perspective, but there will be a benefit in terms of system implementation complexity and cost reduction.		
1.12	8.1.6 (a) (vi) Same comment as above		Amend drafting to a 'a new type 1-5 metering installation'
1.13	8.1.6 (c) (i) UE currently does not utilise a type 37 reason code and will need to build into its IT systems. UE is not in a position to make these system changes until the Nov 2015 release. UE note that AEMO have made no comment on the effective date on this Churn Pack. UE is not in a position to comply with the type 37 reason code until late in 2015 and hence considers that the Churn Procedures and the MP SLP could continue with an earlier date of effect to assist with the discrepancy between the NER and the AEMO Procedures.	**IT change**	The date of effect of the MDP SLP should be clarified to be Nov 2015 release.
1.14	9.5 The section on a non public telecommunication network should be removed. The MDP is collecting and processing data, it is the RP role which may be better placed to ensure that the metering installation and the service providers comply with the requirements. The MDP role is not the party selecting the telecommunications methodology. The MDP obligations should be around the meter data quality and should be outcome focussed. Sub clause (e) should be deleted, the MP SLP notes that the public telecommunications are not fully redundant and the MP may be requested to provide some data but not all data. The drafting for any non public telco should not be more onerous than the recognition in 4.27.3 that where any	**Procedure only**	Remove section 9.5.

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	telecommunication network fails, it may not be practical to collect the data manually.		