METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION
PARTICIPANT RESPONSE PACK

***Participant**: Ergon Energy Corporation Limited*

***Completion Date**: 2 June 2016*

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1. Glossary and Framework

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
Chapter 3	Glossary	Average Daily Load (ADL) The definition of “metering installation” states that it “may include a combination of several metering points to derive the metering data for a connection point”. Therefore, the ADL refers to a connection point that may contain one or more metering points. Ergon Energy therefore considers the definition of ADL should only include connection point and not “or metering point”.		

2. Meter Data File Format

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
APPENDIX C	QUALITY FLAGS	The “Meaning of Quality Flag” column has been removed. This should be reinstated as it provides important information.		

3. Metrology Procedure: Part A

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
3	RESPONSIBILITY FOR METER PROVISION	Heading should be “METERING” not “METER”. The MP does not provide all of the components of a metering installation now (e.g. instrument transformers) and in the future may not even provide or own meters. Consequently this section should reflect the broader term “metering”.		
3.1	Overall requirements	Further clarification is required regarding statement that ‘MCs must use MPs to provide, install and maintain’ relevant components. Whilst it is existing wording, it often creates contention especially in HV installations where ownership of plant is agreed between the LNSP		

		and customer as part of the connection point agreement, often months/years before FRMP is appointed and MC/RP is known. In addition, in some jurisdictions LV CTs are supplied by the distributor. Considering these issues, Ergon Energy suggests the abovementioned statement be reworded as follows: 'MCs and MPs must ensure 'provision is made' for components' and that they are properly selected, rather than MPs must 'provide'.		
4.2	Use of optical ports and pulse outputs	For clarity, Ergon Energy suggests that the second paragraph be moved to become the first paragraph, and commence with the bolded wording below: "**Where requested by a FRMP**, the MC must provide pulse output facilities representing the ……etc." (i.e. remove same wording from end of paragraph).		

		Additionally Ergon Energy recommends the inclusion of new heading after third paragraph: "Optical Ports"		
4.4	"x" values – calculation and use	In accordance with the NER rule 7.8.3 any new and replacement metering installation for a small customer must have type 4 metering, subject to the provisions of rule 7.8.4, which stipulate when a Type 4A metering installation is required. The value of 'x' in clause 4.4 is stated as the threshold for Type 5 meter installations in Queensland (0MWh / annum). However notwithstanding the reference in clause 4.4 being to Type 5 installations only, S7.4.3 of the NER also refers to 'x' as the volume limit per annum per connection point for a Type 4A metering installation. As such Ergon Energy notes that the Metrology Procedure Part A will need to be updated to reflect the jurisdictional thresholds as they are determined by relevant Ministers.		

4.5	"y" values – calculation and use	Following above comments from 4.4, Ergon Energy seeks confirmation from AEMO on the appropriate treatment of Large Queensland Non-Market Customers >100MWh to <750MWh. Specifically, there does not appear to be an obligation on Ergon Energy to install new and replacement meters as Type 4 in line with NER 7.8.3, unless consumption moves >750MWh or <100MWh.		
5.3	Technical Requirements	To ensure polyphase meters capture total premise load within a single trading interval, Ergon Energy recommends the wording of this clause be amended as follows: "Where a poly-phase *metering* device is installed within a *metering installation*, the *metering installation* must be capable of recording and providing the average voltage and current over a nominated *trading interval* for one or more nominated *trading intervals*, for ~~each~~ all connected phases."		
7	EMBEDDED NETWORKS	Ergon Energy recommends The term Child "Metering Point" be changed to "Connection Point" as the child		

		could have one or more Metering Points at the Connection Point.		
8	REVERSION OF METERING INSTALLATION TYPES	Item (2) in the Queensland section will not apply from December 2017 and should be removed. (i.e. "The MC may convert a remotely read Interval Meter to a manually read Interval Meter if the consumption drops below 100MWh per annum.")		
10	INSTALLATION OF METER(S)	In table section (b), the Queensland jurisdictional requirement applies to all metering installation types, not just type 4 or 4A. Recommend "type 4 or 4A" be deleted so that this section extends to cover all metering installations, including type 5 and 6 which would not be covered by the proposed wording.		
12	DE-COMMISSIONING AND REMOVAL OF METERING EQUIPMENT AND NETWORK DEVICES	Clarity needs to be provided to ensure the **incoming** MP has accountability for the final reads. For example, as bolded below: "Before De-commissioning all or any part of an existing metering installation, the **newly appointed** MP undertaking work must ensure		

		that:"		
12.1	Network Devices	In regards to load control, clause 12.1.1 does not adequately describe a network device, as per rule 7.8.6 of the NER. Suggest addition to 12.1.2(b)(i) - "…, such as the control of a hot water via load control relays, and that service is obsolete as a result of the Meter Churn and no longer required by the *retail customer*; or". 12.1.3 & 12.1.4 Require details around the timeframes for notifications and responses, particularly where they relate to Meter Churn.		
14.1	Criteria for determining Emergency Condition	Ergon Energy does not consider the first point to be an accurate reflection of an 'emergency condition' and on this basis we recommend it should be amended to reflect unplanned / unforeseen interruptions only, and not applied to planned interruptions that otherwise would be captured by NECF notification procedures.		

		Suggest: "Unplanned interruption to the general power supply to one or more sites, regardless of duration" --- Ergon Energy also suggests AEMO provide acknowledgement of the operational difficulties that emergency conditions will bring to the market under the proposed market arrangements regarding customer impacts for re-energisation after such events (e.g. flood, cyclones etc). Finally, we Suggest another criteria as follows: LNSP to stipulate / agree on the restoration process with the MC regarding restoration and customer re-energisation after an emergency event including replacement and repair of affected metering installations.		

4. Metrology Procedure: Part B

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
2.4.	Metering data quality flags	Section 2.4 references sections that no longer exist - sections 3.4.3(b) and 3.4.3(h).		
3.2.	Substitution Rules	It is not clear for the purposes of this clause how a FRMP can be a market generator or MSGA.		

5. MSATS Procedures: CATS Procedure Principles and Obligations

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
4.7	OBJECTION CODES	The “badmeter” objection code has been removed. Further information is required as to the reason for its removal, as it is not clear why this has occurred.		

6. MSATS Procedures: MDM Procedures

No comment.

7. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
2.7.	Objection Rules	The “badmeter” objection code has been removed. Further information is required as to the reason for its removal, as it is not clear why this has occurred.		

8. NEM RoLR Process Part A and B – MSATS Procedure: RoLR Procedures

No comment.

9. NMI Standing Data Schedule

No comment.

10. Service Level Procedures for MDP

No comment

11. Service Level Procedures for MP

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
3.1	Purchasing	MPs may or may not purchase meters, instrument transformers etc. and these can be purchased and provided by others. Consequently, the requirement that the MP **must** have processes introduces an		

		unnecessary constraint.		
3.2	Storage, handling and transport	MPs may not store, handle or transport meters or instrument transformers and the requirement that they **must** have processes introduces an unnecessary constraint.		
3.3	Management of test equipment	3.3(c) Ergon Energy seeks confirmation from AEMO on whether the provision of test equipment certificates that show full traceability to test certificates to NATA accredited laboratory meet the requirements of this clause?		
4.1	General commissioning requirements	4.1 (h) Ergon Energy requests clarification of the term "designated load" We consider a designated load to be a 'known' or 'measured' load which could be customer load. As such, we suggest inclusion		

		of the bold term below: " where the metering installation includes instrument transformers, register reads are validated by use of a **measured or** designated load being placed on load side of the metering installation…"		
4.4	Meter Churn	Ergon Energy questions the driver for clauses 4.4 (a) and (b) to revolve around the inclusion of instrument transformers? Ergon Energy believes they would apply more practically if the driver was the remote acquisition of metering data. Ergon Energy seeks confirmation on why clause 4.4 (a) explicitly applies to remotely read sites <u>with</u> instrument transformers? Specifically, Ergon Energy understands the clause applies to all sites that are remotely interrogated, not just those that have instrument		

		transformers. As such we suggest that clause 4.4(a) be amended as follows: "where the metering installation has remote acquisition of metering data ~~and includes instrument transformers~~, the MP must:" Similarly, for the reasons cited above, we suggest that clause 4.4(b) also be amended as follows: "where the metering installation does not have ~~instrument transformers~~ remote acquisition of metering data, the MP must		
5.1	Test Plan	5.1(a) second (a) in clause – there is a spelling mistake of the word "installations"		

12. Other Issues Related to Consultation Subject Matter

No further comments.