METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

POC PROCEDURES CONSULTATION (PACKAGE 2)

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: Aurora Energy*

***Completion Date**: 16 January 2017*

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1. Glossary and Framework

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
	Content	Aurora Energy Comment: There is no heading for Figures that appear in all other AEMO documents, although there are only 2 figures they should be included in the content
	General Comment	All acronyms should be included along with a valid definition i.e. MTRD,SORD, CUST, SITE, OWNP
	General Comment	It is noted that in the Glossary there are several Terms that show an Acronym – however in the definition it only explains the abbreviation not an actual definition of the meaning – I have included a small number under the Glossary as an example.
	General Comment	It has been noted that during the B2B consultation process that Aurora Energy's comments on the glossary have been passed onto the procedural working group to review. It is considered that these have been therefore been sent to AEMO for consideration.
2.1	The Role of the Retail Market in the NEM	Aurora Energy Comment: Figure 1 High Level View of Retail Electricity Market Processes – the picture at the bottom of the figure needs to be made clearer
2.11	MSATS Codes	In most cases where the MSATS code 'LNSP' is used it means the LNSP as defined in section 3, however, where it is used in the context of an

		embedded network, the same code will be used to refer to relevan ENM Aurora Energy comment - relevant.
3	Glossary	Backup RoLR As defined in the AER RoLR Guidelines. Aurora Energy comment - If using a guideline as a definition add the link to the guideline and preferably the page reference, as this is not really a definition.
	Glossary	Business - As defined in the NERL Aurora Energy comment – Can a link to the NERL be added for easy reference to the document?
	Glossary	Business Hour - A period of one hour within a business day. Aurora Energy comment - Why use Business Hour and not Business Hours which is referred to substantially more through various AEMO documents
	Glossary	Cooling-Off Period Aurora Energy comment - Should read “As defined in the NERR. Apart from In Victoria: As defined in the Energy Retail Code published by the Essential Services Commission of Victoria”. The majority should come first and as Victoria is the anomaly it should be next. Also If using a document as a definition add the link to the document, as well as the page reference as this is not a really a definition.

	Glossary	CT Current transformer Aurora Energy comment - This is not a definition – there needs to be more detail as it only explains what the acronym is.
	Glossary	Data Delivery Calendar - The AEMO document entitled: Data Delivery Calendar. Aurora Energy comment – This is not a definition it needs more detail
	Glossary	DLF - distribution loss factor distribution loss factor Aurora Energy comment - This is not a definition – there needs to be more detail as
	Glossary	Estimated Reading - An estimate of a Meter Reading where an Actual Meter Reading is not yet available. Aurora Energy comment - This indicates a substitute read as well and is not clear enough to define between the two and when they are used. Perhaps consider - Estimations apply to a period that has an end date/time in the future. As per metrology part B
	Glossary	Explicit Informed Consent Aurora Energy comment - Should Read “As defined in the NERL. Except in Victoria: As defined in the Energy Retail Code published by the Essential Services Commission of Victoria. The majority should come first and as Victoria is the anomaly it should be next. Also If using a document as a definition add the link to the document, as well as the page reference as this is not a really a definition.

	Glossary	Life Support Aurora Energy comment - Should read “A situation where an End User relies on electricity for the operation of ‘life support equipment’, a term defined in: In the NERR; and Victoria, in the Electricity Distribution Code. The majority should come first and as Victoria is the anomaly it should be next. Also If using a document as a definition add the link to the document, as well as the page reference as this is not a really a definition
	Glossary	NMI Discovery Search 1 - See also the NMI Search Rules in section 41.3 of the CATS Procedures Aurora Energy comment - Should be 43.3
	Glossary	NMI Discovery Search 2 - See also the NMI Standing Data Access Rules detailed in section 41.4 of the CATS Procedures Aurora Energy comment – Should be 43.3
	Glossary	NMI Discovery Search 3 - The search process that can only be used for one of the purposes detailed in section 41.6(a) of the CATS Procedures Aurora Energy comment – Should be 43.3
	Glossary	NMI Search Rules - See Table 41-B in the CATS Procedures. Aurora Energy comment - Should be Table 43-B
	Glossary	Regulator Aurora Energy comment – Should read - In the context of a RoLR Event,

		the AER and the Essential Services Commission of Victoria (for Victoria)
	Glossary	Residential Aurora Energy comment - This is not a definition – there needs to be more detail. Add the link to the document
	Glossary	Aurora Energy comment - There is no Term or definition for Retailer but are mentioned in this guide and through other documents (although these may have been changed to initiator in which case this term needs to be included as does Notified Parties and Recipient
	Glossary	Aurora Energy comment - There is no Term or definition for RoLR but RoLR is mention in other forms i.e. RoLR Event

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

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
3.4.3	Warnings	The level of warning may be taken into consideration during a Review of a subsequent Breach by the same Participant. Aurora Energy Comment: Does the word review need capitals?

5.1.1 (c)	Notice to Affected Parties	Aurora Energy Comments : The LR would also be considered an affected party if the breach was against MP/MDP so needs to be included here

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
		Aurora Energy - No Comments

4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
		Aurora Energy - No Comments

5. Qualification Procedure

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
		Aurora Energy - No Comments

6. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
4.3.1	Market Exit	Upon request from the FRMP of the Child NMI, The ENM must update the NMI Status Code of the Child NMI in MSATS to 'N' Aurora Energy comments - this is no longer valid. As soon as a NMI becomes a child or a child goes on market again that NMI is made X in the market and a new NMI is created?
4.3.4	De-energisation and Re-energisation of Child NMIs	If a NMI is N but is also Active this indicates that there are also states of a child NMI that can be A,D or X – is the N status only for off market Child NMI's ? I believed this was no longer valid due to the fact as soon as a NMI becomes a child or a child goes on market that NMI is made X in the market and a new NMI is created?

7. Unmetered Load Guideline

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
		Aurora Energy - No Comments

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments
			As per previous comments made during the first round of WP2 consultation Aurora Energy would like the previous comments made in this section reflected in the second stage consultation . The following is therefore a repeat of our previous comment.
Small Customer Metering Installation		Purpose	This guideline is focussed on the exemption process for connecting a meter to a telecommunications network, but does not link to a customer objection for telecommunications. Aurora Energy understand that AEMO would have to determine that any small meter which is classed as 4A, but for which there is no record of a telecommunications exemption would, by a process of elimination, have to assume that these remaining sites are customer objections. Aurora Energy considers this a poor outcome and believes that any site which is classed as 4A should have a record of a customer objection or telecommunications exemption provided to AEMO which is discoverable and should be identified within MSATS as customer Objection or telecommunications exemption.
Small Customer Metering Installation		Exemption	It has been widely discussed that the establishment of a telecommunications connection may be achievable but at a significant cost.

Document	Clause	Heading	Participant Comments
			The National Electricity Objective (NEO) requires that electricity services be provided in an efficient investment and operation in terms of price and security of supply. Aurora Energy therefore considers that the cost of telecommunications charges relative to the cost of manual meter reading and energy consumed should be considered as part of the exemption process so that the provision of telecommunications is provided within the obligations of the NEO.
Small Customer Metering Installation		Exemption	NER Cl 7.8.4(a) provides for an MC to demonstrate that there is no existing telecommunications network which enables remote access to the metering installation. In order to reasonably demonstrate the lack of a telecommunications network at a site, Aurora Energy would consider it reasonable that the MC and their contract parties have time to evaluate a site and the MP would have to establish appropriate telecommunications contracts or systems or networks prior to being required to submit the exemption. Therefore, in the interests of meeting the National Electricity Objective (NEO) for efficient operation of electricity services, Aurora Energy suggests that an MC/MP have 10 business days (in line with the time specified in the NER for type 4 meter malfunctions) from the installation date of a small customer meter to attempt to establish a connection to a telecommunications network prior to being required to submit an exemption.

Document	Clause	Heading	Participant Comments
Small Customer Metering Installation		Expiry	Clause 2.2.2(b) states that the exemption will cease 3 months after a telecommunications network provides coverage in the vicinity of a metering installation. Aurora Energy queries how this expiry would work operationally. The MC/MP may not be aware of a change in telecommunications network or start date, and could therefore discover that an exemption has expired unexpectedly, making them non-compliant. The implication is that an MC must have a mechanism to monitor telecommunications company network roll outs. Further, the presence of a telecommunications network in the vicinity does not mean that there is telecommunications availability at the metering installation Aurora Energy believes that the clause should be redrafted to state that Within 3 months of becoming aware of a telecommunications network providing coverage within the vicinity of a metering installation the MC must review the status of the metering installation and either enable communications (assuming no customer objection) or submit a new exemption application.
Small Customer Metering Installation		Timing of Application	Aurora Energy believes that there should be a 10 business day period from the installation of the meter until an exemption is required to be submitted, as is requires in the Exemption Procedure for malfunctions. This would allow for an efficient and cost effective electricity service to be

Document	Clause	Heading	Participant Comments
			provided by the MC/MP and reduce the number of applications required to be made to AEMO.
Small Customer Metering Installation		Change of Metering Coordinator	Aurora Energy considers it likely that some MPs may be contracted to multiple MCs and that in undertaking a customer churn, including an MC churn; it would be unreasonable to consider that the same meter at site is only granted an exemption from one MC, rather than any MC through which that meter service is procured. Aurora Energy believes that if the exemption is limited to a single MC, then other MCs may reject a request to be an MC at a site until they can make a further application to AEMO, which would delay a customer churn. Further, the process of multiple MCs making application to AEMO for a meter provided by a single MP at the same site is inefficient and costly and is in contradiction to the NEO principles. Therefore, Aurora Energy believes that, while the current MC may be responsible for making the application, the exemption should reside with the MP and site and be discoverable through MSATS for incoming MCs and retailers.