METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

POC PROCEDURES CONSULTATION (PACKAGE 2)

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**:* *AGL*

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

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1. Glossary and Framework

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Clause	Heading	Participant Comments – AGL Glossary
1.2	Definitions and Interpretation	AGL queries the benefit of the amendment where a defined term used in one procedure is only defined in that procedure. The whole point of the glossary was to consolidate terms to either the Rules or glossary. There is a small risk that a singly defined term might be re-used in another procedure leading to varying definitions, which is what is being avoided. AGL suggests that any defined term (whether used in multiple procedures or a single procedure) be included in the Glossary.
2.1	The Role of the Retail Market in the NEM	Temporal reference to roles In B2B the term for a new/incoming retailer is 'Prospective Retailer' and that term is used extensively within those documents. Suggest that the final sentence be amended to … is referred to as 'New' or 'Prospective'.

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

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments – AGL Default Deregistration
	General Comment	While this procedure may not seem overly complicated, the lack of logical progression and process flow will make the operationalisation of this process complicated and prone to misapplication by AEMO operational staff.

Clause	Heading	Participant Comments – AGL Default Deregistration
3.1	Issue of Breach Notice	AEMO in the Draft determination state in 4.3.4: "AEMO will not be developing a breach classification framework of the type suggested in submissions as it considers that the framework proposed provides sufficient flexibility for AEMO to address Breaches on a case-by-case basis and by taking into account prior Breaches, regardless of whether they arise under similar circumstances." AGL's and many submissions sought more detail, clarity and consistency on the methodology for assigning breach severity. AEMO's response regarding flexibility appears to be creating the issue for participants as it may be open to inconsistent application or misuse. Clear governance in the application of this process is critical within the energy industry. UE suggest that any issue/breach be reviewed by an AEMO Board sub-committee (e.g. the Risk Committee) and subject to market audit review so that breaches are managed in a consistent manner amongst participants and are consistently managed over time. Where the severity of the breach is not subject to the discretion of just one person, this should allay some of the issues regarding consistency, preferential relationships etc.

Clause	Heading	Participant Comments – AGL Default Deregistration
3.2	Review of Capability for Ongoing Compliance	This clause specifically requires the breach to be rectified within 7 days after the breach notice is issued, but the next sub clause (3.2.1) recognises the provision of a remediation plan – which may specify more than 7 days to rectify. Clause 2 specifically recognises that a breach may be self-reported. It is expected that a remediation plan may be provided with that self-reporting. Clauses 3.1 and 3.2 do not flow logically, nor do they accommodate the steps which would be expected to take place. As this is a procedure and not a policy it is expected that the various steps each party would be required to take would follow a logical process; i.e. • Breach is identified – either from review etc. or by self-reporting • Participant contacted for details and remediation plan • Breach is assessed for severity – may include various steps – e.g. organisational review • Breach Notice is issued • Remediation plan is monitored or • If remediation plan completed – breach notice is closed • if remediation is not taking place – warning / default notice is issued (depending on severity of breach)

Clause	Heading	Participant Comments – AGL Default Deregistration
3.3	Determination of Type of Breach	In respect of item (e) unethical behaviour – this clause should be deleted. It is not appropriate for AEMO to attempt to pass judgement on whether or not a Participants' behaviours are ethical or unethical. The question of ethical or unethical is a matter which belongs in an appropriate regulatory environment. AEMO is entitled to provide professional judgement in respect of various AEMO procedures but that is as far as it goes. AEMO is a market operator and not a regulator and therefore cannot and should not attempt to take a position in this respect.
3.4	AEMO action following Review	This clause seems to more correctly follow clause 3.2 and could be relocated
4.2	Constraints	AGL questions the constraints that AEMO has indicated that it would attempt to impose on a participant. Constraint (a) noted – assuming that limiting volume limits risk to the market; Constraint (b) – poor example – if AEMO were to limit an MDP from reading metering installations with multiple data streams then there is likely to be a substantial impact on other participants and the market. Suggest this example is removed. Constraint (c) noted Constraint (d) noted.

Clause	Heading	Participant Comments – AGL Default Deregistration
5.1	MP, MDP or ENM	Cl 5.1.1(c) AGL notes that within the list of affected parties the Local Retailer is not considered. This impacts both DNSP local retailers and EN local Retailers. AGL would like to see the Notice to affected parties include the LR as they are a financially impacted by a metering issue.
5.2	MC	Cl 5.2(b) – FRMP appointment of an MC are only under clause 7.7.1(a) and therefore clause (b) should also be under NER cl 7.7.1(a). Suggest (b) be written as: otherwise the FRMP must appoint the new MC under clause 7.7.1(a) of the NER.
6	VOLUNTARY DEREGISTRATION	It is noted that an MC is directed to contact the AEMO de-registration desk for de-registration. The other parties (ENM, MP/MDP) however have not been provided with any guidance on how to seek de-registration or who at AEMO is responsible.
6.2	Process	See comment on Clause 6. The procedure requires a letter to be sent – but does not make it clear who that letter should be addressed to.
Appendix E.	NOTICE TO AFFECTED PARTIES	In reference to submission item 67 (Appendix A – Consolidated feedback) by UE, which AEMO agreed with, AGL notes that Appendix E does not seem to contain much information in regards to the breach which was the nature of UE's submission on this item.

3. Exemption Procedure (Metering Installation Malfunctions)

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Clause	Heading	Participant Comments – AGL Exemption – Meter Malfunctions
2	Application process	AGL notes the introductory statement but believes that an exemption can be issued to the MP as the rectification lies with the MP (see NER 7.8.10) The obligation to submit the application is mandated to be the 'current' MC. However, the rules do not state that the recipient of the application is the MC. That is a position that AEMO has chosen to take. The Rules do state (and therefore recognise) that the MP will provide the remediation plan and undertake the work for the rectification of the metering installation, and therefore it is an equally valid position that the exemption is applied to the MP.
2.1	Applicant	AGL notes that an LNSP is exempt from the application process, but does not see any obligation within the procedure [noting the obligation within NER Cl 11.86.7(g)(3)] for an LNSP to advise the relevant party (current retailer or customer) in a timely fashion that the meter is malfunctioning or has failed, so that the meter can be replaced as soon as practicable. It is suggested that the procedures reference the LNSP obligation under NER Cl 11.86.7(g)(3).

Clause	Heading	Participant Comments – AGL Exemption – Meter Malfunctions
2.3	AEMO's Determination	The timings with this clause are inconsistent. The clause starts with 5 business days – but clause (d) specifies 2 business days. AGL also queries why it will take AEMO 5 business days to review an application for an exemption, given that Participants may only have 2 business days to identify an issue, develop a remediation plan (see Form A) and apply for an exemption. The additional delay in AEMO responding to a participant application could lead the participant to be non-compliant. AGL believes that AEMO should respond in two days.
2.4	Matters taken into Consideration	Clause (g) indicates that a rectification plan **may** be provided. Appendix A indicates than an exemption will **not** be granted without a draft rectification plan. This is inconsistent with NER Cl 7.8.10 (c) and with the main body of the procedure (multiple clauses) and does not seem appropriate as the requirements to affect rectification may not be known until site visits have been programmed and the specific issues identified. Suggest delete the **Important Note** in Appendix A

Clause	Heading	Participant Comments – AGL Exemption – Meter Malfunctions
2.5	Grant of Exemption-	The linkage between this clause (cl 2.5) and clause 2.8 seems unnecessary. This clause (2.5) indicates typical conditions AEMO may impose on an MC, but clause 2.8 makes these typical conditions mandatory on an MC during an exemption period. Suggest delete the typical conditions in cl 2.5 which are obligations in clause 2.8.
2.9	Expiry of Exemption	Grammar – suggest put 'the' at end of lead sentence after 'earliest of' ….upon the earliest of **the:**
3.1	Timing	The NER obligation (Cl 7.8.10(c)) requires the MP to provide the rectification Plan, not the MC. The procedure should be amended to recognise this.
Appendix A.	APPLICATION FOR EXEMPTION	Item 1 – Applicant Based on the two colons – is more than the participant ID required or is only the Participant ID – e.g. is the following required? Applicant: Joe Bloggs Participant ID: SOLARIS
Appendix A.	APPLICATION FOR EXEMPTION	AGL queries the benefit of the postal address – a registered or accredited participant's address is lodged with AEMO and AGL would expect communications to be undertaken electronically.

Clause	Heading	Participant Comments – AGL Exemption – Meter Malfunctions
Appendix A	APPLICATION FOR EXEMPTION	Item 7 AGL suggests that the circumstances that the fault was detected could be an enumerated list – this would simplify automation and consistency of these requests.
Appendix A.	APPLICATION FOR EXEMPTION	The forms as shown seem to assume that only a single NMI is affected. If there is some sort of software or batch issue, then it is likely that a series of NMIs will be impacted. Does AEMO want a form for each NMI for which an individual exemption will be required or will it issue a batch exemption?
Appendix A	Application for Exemption	Item 11 1. This field may not always be able to be answered when an exemption is submitted; 2. The process for rectification may be standard and it is not relevant to waste time discussing non-viable options
Appendix A	Application for Exemption	Each exemption application and notice should have a unique Identifier for cross referencing.
Appendix B.	APPLICATION FOR EXTENSION	The forms as shown seem to assume that only a single NMI is affected. If there is some sort of software or batch issue, then it is likely that a series of NMIs will be impacted. Does AEMO want a form for each NMI or will it issue a batch extension to the exemption?

Clause	Heading	Participant Comments – AGL Exemption – Meter Malfunctions
Appendix B.	Application for extension	Assuming that each application has a unique reference, the provision of standing information should not be required for an application for an exemption – merely those items which changed.
Appendix B.	Application for extension	An additional field is required to reference the identity of the ID number application.

4. MSATS Procedures: National Metering Identifier

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Clause	Heading	Participant Comments – AGL ***NMI***
General		The order of material within this procedure seems to be haphazard. In general there seem to be sections on: • NMI and NMI history (cl 2.1) • NMI structure; and (Cl 3-8) • Use of NMIs by AEMO – really examples – should be in the appendix • LNSP / ENM obligations.(cl 2, Cl 9, cl 14 for LNSPs) These sections are however, split and separated across the procedure. Suggest that in the final version, the sections be re-allocated to a logical flow. Examples should be shown in Appendixes.

Clause	Heading	Participant Comments – AGL ***NMI***
9.2	NMI Decommissioning	In respect of Cl 9.2(a)(vi) the requirement to de-commission a NMI when the physical location changes likely needs further explanation as to the application of this requirement. For example, if a customer's service is moved from one pole to another it is unlikely that a new NMI is required, although the physical connection point has changed – this may occur when a meter is relocated. See examples in 9.2(c).

<table>
<tr><th>Clause</th><th>Heading</th><th>Participant Comments – AGL
NMI</th></tr>
<tr><td>9.2</td><td>NMI Decommissioning</td><td>
Clause 9.2 of the draft procedure specifies that NMIs moving from LNSPs to ENs be <u>De-commissioned</u>. However, the AEMO ‘POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 2) – DRAFT REPORT AND DETERMINATION’ Cl 4.1.4 stated in response to participant submissions that NMIs moving between LNSPs and ENs would ‘require the <u>extinction</u> of a NMI’.
The drafting in Cl 9.2 of the NMI procedure does not reflect this decision, as it’s discussed de-communising not extinction.
Table 4.8 of the CATS procedure (draft) shows that there is a distinct difference between Decommissioned and Extinct.
<table>
<tr><th>Code</th><th>Name of code</th><th>Description of code</th></tr>
<tr><td>A</td><td>Active NMI</td><td>Applies when a NMI is energised.</td></tr>
<tr><td>D</td><td>Not energised NMI</td><td>Applies when the NMI exists in MSATS and the connection point is de-energised physically.</td></tr>
<tr><td>X</td><td>Extinct NMI</td><td>Applies when the network connection has been permanently removed from the connection point. Under this condition the existing NMI will not be reallocated to any other connection point in the future.
A NMI with this status can never be transferred.</td></tr>
<tr><td>G</td><td>Greenfield site NMI</td><td>Applies toDenotes a Site that has never been energised. The connection point may require further Site works to be undertaken and will also require energisation. Once the NMI Status Code is changed from ‘G’, it cannot revert to ‘G’.</td></tr>
<tr><td>R</td><td>Remotely disconnected NMI</td><td>Applies when the NMI exists in MSATS and the connection point is remotely disconnected</td></tr>
<tr><td>N</td><td>Off Market Child NMI</td><td>Applies when a child connection point is no longer settled in the NEM</td></tr>
</table>
AGL would like to see this section re-written to clearly show the NMI being made extinct.
This information should also be included in the Embedded Network Guide.
</td></tr>
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5. Qualification Procedure

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments – AGL Qualification Procedure
	General	While this is a qualification process for specific functions it would be useful if a complete checklist of requirements was provided in the appendix – including elements such as MSATS and Market Net application forms, which although separate – are required for operation in these roles.
2.3.	Pre-Application Meetings	The pre-reading list should cover MSATS systems access and MarketNet access.
3.4.	Queuing Policy	AGL suggests that applications which are deemed complete by AEMO are placed in the queue, not incomplete applications.
3.5.	Pre-Production Assessment	The MSATS and MarketNet requirements should be included in the pre-reading list and in clause 2.

6. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments – AGL Embedded Network Manager
4.3.2	Resumption as Child Connection Point	The processes described in this clause relating to updating a NMI to status "A" is inconsistent with previous discussions regarding making NMIs extinct. AGL does not expect to see child NMIs resuming in the market. AGL would expect the process to be: • Apply to ENM for a NMI (if no ENM to appoint ENM) • When NMI created – churn meter (if required by retailer) • On meter churn NMI becomes active within the market (like a new connection).
4.3.4	De-energisation and Re-energisation of Child NMIs	In respect to maintaining the NMI Status being in MSATS, it is expected that the NMI Status would be updated if the Embedded Network Operator disconnected the child site (like a DNSP) – the ENM would be responsible for updating the NMI status. If however, the site is disconnected by a remote service, then the MP is responsible for updating the NMI Register Status. This should be clarified in this Procedure.
4.3.4	De-energisation and Re-energisation of Child NMIs	In respect to this clause is it possible for a child connection point to have an accumulation meter?
4.3.5	Child NMI Abolishment	In respect to this clause is it possible for a child connection point to have an accumulation meter?