METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Vector Advanced Metering Services (Australia) Pty Ltd*

Completion Date: *19/7/2016*

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1. Glossary and Framework

Please delete any rows where there are no particpant comments

No comments

2. Meter Data File Format

Please delete any rows where there are no particpant comments

No comments

3. Metrology Procedure: Part A

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
4.7	Data Storage Requirements for Meters	If there is a data storage requirement for Type 4A then it should also apply to Type 4 as any Type 4 metering installation could become Type 4A at some point in time and vice versa given changes to telecommunications network coverage as networks evolve and change. Customer opt-out conditions may also change over time. This goes for any requirement of a Type 4A installation which would be required at install time, given that the MP may not know at that point if the installation will be Type 4 or 4A.		

12	DE-COMMISSIONING AND REMOVAL OF METERING EQUIPMENT AND NETWORK DEVICES	It is not reasonable for there to be an obligation on the MP undertaking the work to ensure a final reading is taken for Type 5 metering installation. The obligation should be on the MP undertaking the work to return the meter, and on the current MP to undertake the final reading from the returned meter. Vector AMS is comfortable with an obligation to provide final reads for Type 6 accumulation meters.		
12.1	Network Devices	The distinction between a “control” service in 12.1.2 (b) (i) and a “switching” service in 12.1.2 (b) (ii) is unclear. Can they be combined?		

4. Metrology Procedure: Part B

Please delete any rows where there are no particpant comments

No comments

5. MSATS Procedures: CATS Procedure Principles and Obligations

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
4.7	OBJECTION CODES	Vector AMS support the reinstatement of the BADMETER objection code to ensure alignment between the Read Type Code and the status of the metering installation.		
4.11	STATUS CODES (NMI AND DATASTREAM)	Vector AMS supports the remote disconnect “D” code on the Meter Register Status, and having this code maintained by the MP, as opposed to the previous proposal to have the “R” code on the NMI Status maintained by the LNSP. This makes it very clear to industry participants the energisation status of the site; and allows the party		

		responsible for the different ways of energising and de-energising the site, also responsible for maintaining the state in MSATS. This also does not preclude an additional near real-time ability to remotely energise, de-enrgise and query the current energisation state via the Shared Market Protocol/B2B.		
4.12	METERING INSTALLATION TYPE CODES	MRAMD (COMMS4AD?) and MRAMC (COMMS4AC?) will be required. If there is a need to distinguish WC and CT for Type 4 then the same requirement would apply to Type 4A. AEMO need to consider Type 4A as a transient state where Type 4 installations could move in and out of Type 4A over the life of the metering installation based on customer preference and/or communications		

		coverage. Not sure what value there is in reassigning Vic AMI meters to VICAMI when existing systems are in place across the market to detect Vic AMI meters based on Metering Installation type Code = MRIM, and Read Type Code = RWD (remotely read). Why not stay with that as a grandfathering arrangement to avoid rework and unnecessary changes to participant systems? With the scope of changes coming through, it is in all of industry's best interest to minimise unnecessary changes.		
16	MAINTAIN METERING – CREATE METERING INSTALLATION DETAILS – SMALL OR LARGE	Vector AMS support the obligation on the MPB to assign the Network Tariff Code as part of updating the metering installation details on any change to the metering installation.		

		As the party that has performed the physical work on site the MPB is best placed to understand which metering register (and therefore datastream) is connected to which load or generation source being metered. To support this obligation, Vector AMS suggest that there is an obligation on the LNSP to provide clear guidelines to MPBs and FRMPs on the allocation of Network Tariff Codes for various metering installation configurations.		
17	MAINTAIN METERING – EXCHANGE OF METERING INFORMATION – SMALL OR LARGE	See comments on 16 above.		
18	MAINTAIN METERING – CHANGE METERING INSTALLATION DETAILS – SMALL OR LARGE	See comments on 16 above.		

19	MAINTAIN METERING - ADVANCED CHANGE METERING INSTALLATION DETAILS - SMALL OR LARGE	See comments on 16 above.		
20	MAINTAIN METERING - ADVANCED EXCHANGE OF METERING - SMALL OR LARGE	See comments on 16 above.		
21	MAINTAIN METERING – CHANGE NETWORK TARIFF CODE – SMALL OR LARGE	See comments on 16 above.		
38.7	Objection Rules	Vector AMS support AEMO's position to reduce the objection period from 5 days to 1 day. Vector AMS support a one day objection period to improve customer switching times consistent with the associated AEMC objectives. Vector AMS acknowledge that there are other market participants who have objected to the one day objection period. As such if AEMO are to consider		

		increasing the proposed objection period, Vector AMS would suggest moving forward with the shortest possible (agreeable) objection period, given that the current 5 day objection period does not provide a good outcome for consumers.		

6. MSATS Procedures: MDM Procedures

Please delete any rows where there are no particpant comments

No comment

7. MSATS Procedures: Procedure for the Management of WIGS NMIs

Please delete any rows where there are no particpant comments

No comments. See feedback on CATS procedures.

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

Please delete any rows where there are no articipant comments

No comments

9. NMI Standing Data Schedule

Please delete any rows where there are no particpant comments

No comments

10. Service Level Procedures for MDP

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
3.9	Specific Metering Data estimation requirements for metering installation types 4A, 5, 6 and 7	Vector AMS suggest that AEMO consider that Type 4A meters be considered the same as Type 4 meters with missing daily reads, rather than Type 5. Type 4 MDPS have accredited systems established to substiture Type 4 meter data, and will need to extend their systems to support Type 5 forward estimation procedures. It is unclear what benefit will be provided to consumers and participants with this approach, given the incremental cost and complexity. AEMO should consider that Type 4A is likely to be a		

		transient state with meters moving between Type 4 and Type 4A on a regular basis as customer choices and telecommunications coverage conditions change. Rather than impose Type 5 style NSRD requirements, Type 4A reading arrangements will be subject to commercial arrangements and AEMO should instead consider imposing minimum service levels for manual reads that avoid imposing legacy constraints on Type 4A reading arrangements.		

11. Service Level Procedures for MP

Please delete any rows where there are no particpant comments

No comments

12. Other Issues Related to Consultation Subject Matter

Jurisdictional Matters

Like other participants, Vector AMS seek a harmonisation of jurisdictional requirements to enable the efficient operation of processes and procedures across each of the jurisdictions in the NEM. While Vector AMS acknowledge that AEMO does not have jurisdiction over such matters within the scope of this consultation, Vector AMS would like this opportunity to put on public record that we seek consistency across the NEM wherever posibble and that we use the Power of Choice reforms as an opportunity to establish greater consistency and that AEMO and the Department of Industry and Regional Development (or equivalent) continue to work with industry and jurisdictional regulators towards this goal.