

Table 3 – Service Level Procedure: Metering Provider Services

In the first round of submissions, AEMO acknowledges that a number of comments were made about formatting issues and the need for consistency. AEMO has reviewed the procedure to correct any of these formatting issues. Again in the second of submissions, AEMO received a number of comments about formatting or typographical issues. Where appropriate, AEMO has taken these comments on board. The detailed comments about formatting or typographical errors are not included in the table below.

ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
1.	AGL	0	General	There are no longer any base service level requirements – such as the maximum time to install a meter. AGL believes that the base line previously applicable should be retained within the procedures.	Meters can now only be installed as a result of an arrangement between the FRMP, the MC and the MP. Timeframes to install are therefore determined in agreements between those parties.
2.	AGL	0	service level requirements	Would expect to see some minimum service levels established to provide a baseline.	
3.	United Energy	1.3	Related Documents	Are there no meter provider obligations re registration in metrology part B or meter obligations in the WIGs procedures? Is this the correct document list?	The list refers to procedures that are directly related to the SLP. MPs must be compliant with all procedures and with the NER. Participants should also note that the list in the table will be alphabetised for the final published version.
4.	Active Stream	2.1	Metering Provider Capability and Competency	Clause 2.1 (d) (1) should read" Applicable AS 3000 wiring rules for metering related work. Not all clauses of AS 3000 is applicable to metering related work.	Not necessary – AEMO considers that it is obvious that requirements in AS 3000 that do not relate to metering work would not apply to MPs.
5.	AGL	2.1(c)	Metering Provider Capability and Competency	Internally provided policies and procedure should be clearly linked to relevant regulatory instruments or good industry practice, and this linkage should be auditable.	Comment noted.
6.	Ergon	2.2	Use of sub-contractors	<u>Meter Replacement Process</u> 2.2 (e) Ergon Energy recommends the mechanism for the notification and the information required within the notification be defined, to provide clarity and quality of process.	AEMO does not consider that greater definition is required. In the case that a notification to AEMO is required relating to this clause, AEMO recommends that the notification be considered in the MPs' processes and procedures and be auditable. Refer to the draft determination for AEMO's response.
7.	Active Stream	2.2	Use of sub-contractors	(e) What is the definition of "sub-contractor"? Does it mean each new field technician has to be notified to AEMO? Does AEMO want to know about all contractors sub-contractors? The requirements are too onerous and should be changed to the MP to maintain a register of sub-contractors	
8.	Ausgrid	2.3	Insurance	The levels and types of insurances specified in this document differ from the current (existing) version of the SLP. Existing SLP General Liability: Yes - No Amount Professional Indemnity: \$10,000,000 Public Liability: Not Mentioned New (Draft) SLP General Liability: Not Mentioned Professional Indemnity: \$1,000,000 Public Liability: \$10,000,000 What is it intended that these change?	Refer to the draft determination for AEMO's response.
9.	United Energy	2.3	Insurance	Clause 2.3 (c) should be expanded to clarify that the MP must make the insurance certificates available to the retailer, LNSP or MC on request not just AEMO.	Refer to the draft determination – it is standard practice for insurance to be considered within standard terms of contracts, therefore the FRMP and the MC can negotiate their requirements regarding insurance in that way. In the scenario where a large customer has appointed its own MC, no rationale has been provided to support the proposal that the Procedure should direct the MP to provide insurance certificates to the FRMP. Further, the FRMP has a contractual relationship with the large customer who has appointed the MC and can seek to obtain such information through the terms of that agreement if they so choose. Similarly, no rationale has been provided to support the proposal that the Procedure should direct the MP to provide insurance certificates to the LNSP.

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10.	AGL	2.3	Insurance	<p>Since it is a requirement for accreditation as an MP to hold insurance, AGL believes that insurance certificates should be made available to all financially affected parties (MCs, FRMP, etc.) on request.</p> <p>The MP must:</p> <ul style="list-style-type: none"> (a) hold public liability insurance for an amount not less than \$10,000,000 per occurrence; (b) hold professional indemnity insurance for an amount of not less than \$1,000,000 per occurrence, which must be maintained for a period of seven years after termination of the MP's registration; and (c) provide AEMO with certified current copies of insurance policies upon request. 	
11.	Momentum	2.3	Insurance	<p>Momentum suggests to include financially responsible parties to also have the right to obtain insurance copies, regardless of whether or not there's a contract with the MC.</p>	
12.	AusNet Services	3.4	Management of meter programming and authorised software	<p>3.4 The MP must: (b) maintain records of equipment, authorised software and programs used for the programming of meters, including any changes to firmware or software within the meter, for a period of 7 years from the most recent date of use.</p> <p>In relation to 3.4(b) above previously, AusNet Services recommended changing the period to two years. AEMO's response referred to the clause 1.9 of the NER obligation, which applies to all records and documents prepared for or in connection with the NER. However, the versions of meter firmware, meter programs and other software within the meter do not represent such record and documents, insofar as these records are no longer relevant in determining the accreditation of a metering provider. Again, since MPs are audited every two years then these requirements should only extend two years. Therefore, we recommend changing the above period to two years.</p> <p>It is interesting to note that in the most recent draft of the MDP SLP section 2.3 only contains obligations to store active energy and not reactive energy. If AEMO was so concerned about maintaining 7 years of records prepared in connection with the NER there would be firm obligation on the MDP to store it for 7 years, afterall this information impacts financial settlements.</p>	AEMO considers that the requirement for 7 years is consistent with clause 1.9 of the NER, which applies to all records that relate to functions performed under the NER. These records are not only relevant to accreditation. These records are also relevant to the performance of metering equipment which is an ongoing requirement.
13.	AusNet Services	3.3	Management of test equipment	<p>3.3 The MP must: (b) maintain records of test equipment, including records of calibration certificates, for a period of 7 years from the issue date of the calibration certificate;</p> <p>Regarding 3.3(b) above previously, AusNet Services recommended changing the period to two years. AEMO's response referred to the clause 1.9 of the NER obligation, which applies to all records and documents prepared for or in connection with the NER. However, calibration certificates must always be kept current and used to demonstrate compliance with the accreditation procedures. After an accreditation of a metering provider, these old records have served their use and are no longer relevant under the NER. Again, since MPs are audited every two years then these requirements should only extend two years, we recommend changing the above period to two years.</p>	
14.	Endeavour Energy	3.2	Storage, handling and transport	<p>We submitted the below comments in the initial consultation. We note AEMOs' response and wish to provide further information.</p> <p>Procedural improvement: We suggest that the last paragraph in clause 3.2 be reworded to 'The MP must ensure that <i>meters, instrument transformers</i> and <i>network devices</i> are returned to their owner within 10 <i>business days</i> following removal from a <i>metering installation</i> if the asset owner indicated that they want their assets to be returned.'</p> <p>We have taken into account AEMO's response in the initial consultation and wish to provide more justification.</p> <p>Although the current clause does not restrict parties from agreeing to not return the equipment, it does define the default arrangement which is to return the equipment. AEMO also stated that there are appropriate incentives on all parties to ensure an efficient process for return and disposal is agreed. However in the absence of an agreement the default defined by AEMO is to return the equipment. This means that by default the owner of the asset bears the responsibility and cost for the disposal. Moving forward there will be a large volume of type 5 and 6 metering equipment that will be removed which are not economical to refurbish and would require disposal. We believe that the party who removed the equipment should be responsible for the disposal if the asset owner does not want the equipment returned. This is to ensure that disposal costs are not cross subsidised by customers who have exercised their choice to not have smart meters.</p> <p>By defining explicit obligation on the disposal, as opposed to relying on agreements, we believe that this would deliver better outcomes for customers.</p>	As the MP will be removing the property of another party, AEMO considers that the default position, if the parties have not agreed otherwise, should be the return of meters to the owner. The current drafting will be retained, however as discussed in draft determination, parties may agree alternative processes for the return or the disposal of equipment. AEMO notes that, in particular for type 5 and 6 metering installations, the MDP obligations to collect metering data from any removed equipment must be considered by parties when forming any such agreement.
15.	Ausgrid	3.1	Purchasing	<p>Add: 'communications equipment and services' to the procurement requirements.</p> <p>Ausgrid contends that the procurement of communications equipment and services is paramount in the delivery of the minimum services and other POC initiatives.</p>	3.1 and 3.3 - An MP must ensure that a 'metering installation' includes a communications interface (see 7.8.2 of the NER), which is defined as the modem and other devices and processes that facilitate the connection between the metering installation and the telecommunications network. Therefore, communications equipment

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					already comes within clause 3.1 as “other devices that can be installed by the MP within a <i>metering installation</i> .”
16.	Ausgrid	3.2	Storage, handling and transport	<p>Add: ‘communications equipment’.</p> <p>Ausgrid contends that the safe and appropriate storage, handling and transport of communications equipment is paramount to the delivery of the minimum services and other POC initiatives – Especially when returning equipment to the owner.</p> <p>Note: The draft identifies test equipment, not communications equipment.</p>	3.2 – Accepted that appropriate storage, handling and transport of communications equipment is important . Alterations have been made to clarify this section (i.e. the handling of calibrated equipment) and AEMO has made alterations in section 3.2(a)(iii) to ensure all devices removed from a metering installation and network devices are included.
17.	Ausgrid	3.3	Management of test equipment	<p>Add: ‘communications equipment’.</p> <p>Ausgrid contends that the management of test equipment for communications equipment is paramount to the delivery of the minimum services and other POC initiatives – Especially when applying for a type 4A exemption.</p>	
18.	Momentum	3.4	Management of meter programming and authorised software	<p><u>(b) maintain records of equipment, authorised software and programs used for the programming of meters, including any changes to firmware or software within the meter, for a period of 7 years from the most recent date of use.</u></p> <p>Momentum supports this clause.</p>	Noted.
19.	Metropolis	3.4	Management of meter programming and authorised software	<p>As raised in the initial feedback, it is unclear what the purpose of this is. In a recent forum, AEMO was unable to provide any insight into why this information will be of any value. Given that there is a cost to this, and no value associated, it does not meet the NEO.</p> <p>This section has been added, despite it not being part of the <i>Power of Choice</i> rule changes.</p> <p>Metropolis recommend that it is removed entirely.</p>	<p>The requirements provided for in 3.4 are consistent with clause 1.9 of the NER. AEMO notes that that the NER 1.9 has not recently changed.</p> <p>AEMO considers that this requirement supports the initial and on-going compliance of the MP as contemplated in the current Accreditation Checklist items 9.345 and 9.360.</p>
20.	Ergon	3.3	Management of test equipment	<p><u>Meter Replacement Process</u></p> <p>3.3(c)</p> <p>Ergon Energy maintains and calibrates our test equipment against referenced standards as provided by NATA.</p> <p>As such, test equipment should be “traceable to” not “calibrated by” a NATA accredited laboratory, otherwise we will be required to send all our testing equipment to NATA for calibration; increasing costs.</p>	<p>AEMO does not consider that the requirement stated in the procedure section 3.3 contradicts the NER clause referred to in submissions in any way, rather it is wholly consistent with the requirements in the NER. Testing of reference or calibration equipment, such as a ‘test-set’ must be performed by an appropriately accredited testing body. The tests undertaken by that equipment are then fully traceable to the certificate issued by the testing body.</p> <p>As provided in the draft determination, AEMO is happy to liaise with any MP directly on individual methods that could be deployed to meet this requirement.</p>
21.	PWC	3.3 (b)	Management of test equipment	<p>Subject to clause 3.3 (c) , It must read</p> <p>“maintain records of test equipment including records of NATA traceable calibration certificates, for a period of 7 years from the issue date of the calibration certificate;</p>	
22.	PWC	3.3 (c)	Management of test equipment	<p>The proposed requirement is in direct contradiction of the S7.2.3 (b)(5) of the NER. The NER requires the “all <u>reference/calibration</u> equipment for the purpose of meeting test or inspection obligations must be tested to ensure full traceability to test certificates issued by a NATA accredited body or a body recognised by NATA under the International Laboratory Accreditation Corporation (ILAC) mutual recognition scheme and documentation of the traceability must be provided to AEMO on request.</p>	
23.	Active Stream	3.3	Management of test equipment	<p>Active Stream are re-instating position taken in first round that was not accepted by AEMO:</p> <p>3.3 c) wording is very prescriptive. Testing equipment are only “Tested” not “Calibrated” by a NATA accredited testing laboratory.</p> <p>Should be “tested to ensure full traceability to a test certificate by a NATA accredited testing body”</p> <p>This should be in line with NER working and removed from this document</p>	
24.	Endeavour Energy	4	Installation and commissioning requirements	<p>We submitted the below comments in the initial consultation. We note AEMOs’ response of and wish to provide further information.</p> <p>It is common industry practice that the MP de-energises the metering installation before performing any meter changes. Therefore we believe that it is appropriate that any obligations related to de-energising the metering installation for meter changes are in the SLP for MPs.</p> <p>Procedural improvement: This section should include obligations on managing a shared isolation point scenario. We suggest a new clause: ‘The MP must determine the isolation point that will only de-energise the <i>metering installation</i> that they intend to work on. If such an isolation point cannot be determined then the MP must stop work and inform the MC’. Shared isolation</p>	AEMO disagrees – the NER does not allow the de-energisation of a customer without due process (i.e. the FRMP must provide notice of a planned interruption of supply to the DNSP, etc.). Any such requirement on the MP, needs to be considered in commercial agreements between parties.

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				points are more common with small customers therefore defining the procedure for managing this scenario would help to minimise negative customer experiences.	
25.	Metropolis	4.1	General commissioning requirements	<p>4.1(c) This new requirement is not part of the <i>Power of Choice</i> rule changes, so it is not clear why it has been added. The make and model of metering equipment is on the nameplate, and every meter must be pattern approved. If the accuracy class is required, it is a simple matter to look it up.</p> <p>In addition, this information is available to appropriate parties via the MPs records. It is not clear who would require this information in the field, that would not already have access to it.</p> <p>For CT/VTs, the records have been poorly managed in the past, and there is no clear owner or party responsible for maintaining the information going forward, so there may be value in this. However, if the nameplate is readable, it's a relatively simple matter to look up the accuracy class for the make and model.</p> <p>Metropolis recommend removing this requirement.</p>	AEMO considers the requirements to be reasonable as provided in the current draft and consistent with the NER.
26.	Active Stream	4.1	General commissioning requirements	<p>These commissioning requirements should be applicable for CT metering installations only</p> <p>This was not addressed by AEMO in the feedback on first round of comments</p>	AEMO considers the requirements to be applicable to all metering installations. No rationale has been provided regarding the proposal to limit commissioning requirements to CT metering installations only.
27.	PWC	4.1(m)	General commissioning requirements	Suggest to remove this. The Table S7.4.3.1 of the NER clearly states that all the setting in reference to EST. Unnecessary duplication of the NER requirments.	Disagree - this section is about ensuring the MP develops, maintains and operates processes and procedures to verify that EST has been set.
28.	AusNet Services	4.1	General commissioning requirements	<p>(l) where an aerial or antenna is installed as part of the metering installation, it is installed in accordance with the manufacturer's instructions and in a manner that maintains the integrity of the meter enclosure, including water and environmental seals.</p> <p>Regarding 4.1(l) above AusNet Services recommended adding a reference to the applicable national safety standards, and in the situation of group metering arrangements to not interfere with existing meter or communications equipment. Although we consider the reference to applicable national safety standards are covered elsewhere, the requirements to not interfere with existing meter or communications equipment in a group metering arrangement are NOT covered elsewhere in the procedures. This is important because it is often quicker and easier for a MP to interfere with the communication equipment of another meter than to properly install the correct cable management.</p> <p>We recommend the following alteration to 4.1(l), "... it is installed in accordance with the manufacturer's instructions, in a manner that does not interfere with other meter communications equipment in a group metering arrangement and that maintains the integrity of the meter enclosure, including water and environmental seals."</p>	<p>In the case where any such arrangement is found and the device or devices installed are <i>network devices</i>, the MP must treat them as such.</p> <p>In the case that the arrangement is not associated with a <i>network device</i>, existing arrangements are not in themselves a barrier to the MP proceeding with the installation work.</p> <p>AEMO notes that all communications equipment must comply with applicable standards as provided for in the SLP.</p>
29.	United Energy	4.2	Metering Data Validation Requirements	<p>Feedback Point B:</p> <p>Under a) insert additional point – meter data shall be collected on a daily basis from the meter.</p> <p>It is critical that minimum service levels are included for MPs to enable collection of interval meter data from remote acquisition Type 4 meters on a daily basis to align with MDP requirements to publish meter data to market.</p> <p>Please refer to related comments in Service Level Procedure for MDP Services Section 3.3 and Metrology Procedure Part A, which highlight the criticality of retaining the current daily read frequency for Type 1-4 meters.</p>	Not accepted – the proposal relates to collection frequency, which is unrelated to the scope of the SLP MP. In addition, there is no NER requirement for type 4 metering to be read daily as suggested.
30.	United Energy	4.2	Metering Data Validation Requirements	<p>Feedback Point A:</p> <p>The MP is to validate remotely read small customer metering installations and manually read metering installations in accordance with Metrology Part A, clause 13.5. However clause 13.5 does not cover small customer type 4 remotely read metering installations. Suggest the inconsistency between the two documents be addressed by removing 4.2 (a) (iii). Refer also to comments in Metrology Part A, clause 13.5.</p>	Section 13.5 of Metrology Part A has been updated to include whole-current type 4 small customer metering installations.
31.	Metropolis	4.2	Metering Data Validation Requirements	<p>4.2(a)(iii) has been incorrectly added. The referred to section, 13.5 of Metrology Procedure: Part A, is applicable only to to type 4a, 5, 6 & 7 meters.</p> <p>The capitalised term "Validated" is not defined.</p>	"Validated" is now a defined term in the Glossary.
32.	Endeavour Energy	4.4	Meter Churn	<p><u>MRP</u></p> <p>We submitted the below comments in the initial consultation. We note AEMOs' response of 'The NER does not allow a 'New MC' to authorise Meter Churn' and wish to provide further information.</p> <p>Consider the scenario when a type 6 is to be removed and a type 4 is to be installed. While the NMI is a type 6 the MC would be the LNSP. Based on the current clause and AEMO's response the MP is not allowed to change the meter unless the LNSP, as the current MC, authorised the MP to do so. However the LNSP has no direct relationship with the contract between the retailer, MC and MP.</p> <p>What should happen is that the retailer would have engaged a contestable MC, who would then appoint a MP to perform the meter change. The retailer would need to raise a Change Request in MSATS to nominate the change in MC and MP. While the MC and MP are nominated in the Change Request the MP would then be allowed to change the meter. Once the meter is installed the MDP can then complete the Change Request by submitting the Actual Change Date.</p> <p>Procedural improvement: An MP may perform meter churn when authorised by a New MC. We suggest rewording the lead-in paragraph to 'An MP must only undertake Meter Churn when authorised to do so by:</p>	Not accepted - As stated in the draft determination, only the MC for the market load in MSATS can initiate meter churn.

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				<div><div>a) the Current MC where the MP is the Current MPB;</div><div>b) the Current MC where the MP is the New MPB and the Change Request has passed the objection logging period in accordance with the MSATS Procedures;</div><div>c) the New MC where the MP is the Current MPB and the Change Request has passed the objection logging period in accordance with the MSATS Procedures; or</div><div>d) the New MC where the MP is the new MPB and the Change Request has passed the objection logging period in accordance with the MSATS Procedures'</div></div>	
33.	Ausgrid	4.4	Meter Churn	<div><div>Clause (a): Reword to:-</div><div>(a) where the <i>metering installation</i> has <i>remote acquisition of metering data</i> <u>and instrument transformers</u> prior to carrying out the Meter Churn the MP must:</div><div>(i) make reasonable endeavours to contact the Current MDP, and;</div><div>(ii) provide the Current MDP with details of the New MDP and New MP and their Participant IDs; and</div><div>(iii) request and verify that the Current MDP undertakes a Final Reading.</div><div>Ausgrid contends it is unreasonable to burden both the new MP and Current MDP with an obligation to complete a manual Final Reading on metering installations with whole current metering.</div><div>Clause (new): where the <i>metering installation</i> has <i>remote acquisition of metering data</i> <u>and does not have instrument transformers</u> prior to carrying out the Meter Churn the MP <u>may</u>:</div><div>(i) make reasonable endeavours to contact the Current MDP, and;</div><div>(ii) provide the Current MDP with details of the New MDP and New MP and their Participant IDs; and</div><div>(iii) request and verify that the Current MDP undertakes a Final Reading.</div><div>Ausgrid contends it is reasonable for the MDP to manage the loss of metering data for whole current metering installations capable of remote acquisition and that this SLP must simply allow the MP to contact the existing MDP if that is the agreed process.</div></div>	Not accepted. The requirement supports the MDP in the collection process as required under the NER.
34.	Active Stream	4.4	Meter Churn	<div><div>4.4 installation cannot be performed before CR goes PEND and before the proposed date is reached, whichever is later.</div><div>(a) (iii) Consider removing clause. MDPs will be notified by CRs that they are losing the site and can increase their polling frequency – you could also split into large and small, no requirement for small NMI classification.</div><div>That said, this clause does not stipulate when the final read must be taken.</div></div>	Not accepted – the procedure does not preclude parties from agreeing various methods of complying with this section, however AEMO considers the requirement as drafted to be reasonable.
35.	AGL	4.4	Meter Churn	<div><div>P11 – clause (i) - Incomplete obligation.</div><div>There is no obligation on the MC to advise the financially affected parties, such as the FRMP, LR or LNSP, of suspected theft or tampering.</div><div>AEMO have responded that this issuer should be covered by the agreements between retailers and MCs.</div><div>AGL notes that as large customers can appoint MCs, the retailers will not have contracts with the MCs in these situations. This also applies to LNSPs.</div><div>Therefore, AGL argues that all financially affected parties (FRMP, LR, LNSP and previous FRMP) should be notified of suspected theft or tampering.</div></div>	<div><div>The MC has the overall responsibility for managing access to and security of the metering installation.</div><div>The MC's requirement to advise financially affected parties will be detailed in relevant guidelines.</div></div>
36.	Momentum	0	N/A	<div><div>If there is a meter replacement required for a site flagged as Life Support, or any other site, Momentum suggests that there must be a process specified in this Procedure for an MP to let the LNSP know about it, prior to the Meter Replacement.</div></div>	Not accepted – AEMO considers the requirements for life support to be sufficiently covered in the NERR and that requirements for MPs can be considered in commercial agreements.
37.	United Energy	4.1	General commissioning requirements	<div><div>Where a meter exchange occurs and a customer's supply is interrupted by the MP to allow that to happen, the MP should have processes in place via the MC to know that the customer has been correctly notified in accordance with the NERR retailer planned interruption notification requirements, or alternatively for complex connections arrangements where the distributor is involved and undertakes the interruption of supply to a number of customers with a distributor planned interruption notice.</div><div>Clause 2.1 (d) requires the MP to comply with all jurisdictional and regulatory arrangements. Where customers have not been correctly notified, the wrong customers have been taken off supply or a life support customer has been incorrectly disconnected, the MP must have an obligation to advise the FRMP and the LNSP. The FRMP and LNSP have a number of obligations relating to customer supply and life support which are subject to civil penalty or energy industry penalties. It is appropriate that these situations are advised to the LNSP and FRMP.</div></div>	Not accepted – AEMO considers the matters raised to be sufficiently covered in the instruments referred to and that requirements for the MP can be considered in commercial agreements.
38.	United Energy	4.3	Notifications following Metering Installation Commissioning	<div><div>UE does not support the removal of the following information from the minimum information provided in Table 1.</div><div><div>Technician details</div><div>The name(s) of the technician performing the work at the <i>metering installation</i></div></div><div><div>Licence number</div><div>The licence number of the technician performing the work at the <i>metering installation</i></div></div><div><div>Licence authority</div><div>The name of the party issuing the licence to the technician.</div></div></div>	Disagreed. AEMO does not consider the purpose of the notice of completed work is to support investigations of safety issues. The LNSPs would need to work with the principal parties responsible for performing the work on site i.e. the MP or the MC.

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				Should a customer complaint about electric shock or a customer be left off supply it is important that the LNSP is able to follow up or advise the ESV, particularly where systemic issues are evident. Similarly LNSPs have penalties on disconnection of life support, if a Network needs to get a customer on supply because a metering provider's technician has left the installation in a malfunctioning state, then they should have adequate details to contact the technician. The technician performing the work signs off currently on these forms, industry should be moving to a more real time documentation exchange- What is AEMO's rationale for removing this detail which is a matter of good work practice, and included in the current forms?	Please refer to the Draft Determination, Appendix A table 3 item 106 for Metropolis' submission regarding this issue.
39.	Metropolis	4.3	Notifications following Metering Installation Commissioning	<p>4.3(b) Table 1</p> <p>Data and time: Typo, should be date not data. The date and time of <i>commissioning</i> does not appear to meet the needs of this notice. Commissioning may not occur at the same time as the meter install for a variety of reasons. In this case, the notice may be delayed by a significant amount of time. Propose changing it to the date of meter install, not commissioning.</p> <p>What is the purpose of the Suffix, NTC and Load Type? Historically the load type information has allowed the LNSP to maintain the network tariff code in MSATS. However, if MPs are maintaining NTCs in MSATS, why do the LNSPs need this information via this process – it will be available in MSATS in a similar timeframe.</p> <p>Control device: Presumably this is referring to existing network owned control devices, such as timeswitches and ripple controllers? Is there any desire to have information regarding control devices internal to the meter? I'm not sure what could be provided, beyond the fact that there is an internal controller.</p> <p>Channel: As previously noted, it's not clear what this is or how the channel setting can be determined by a MP.</p> <p>Test Results: The LNSP still has no right to the information, even in this reduced form. More importantly, if commissioning tests have failed there is a known problem and the installer will fix the problem. So the answer will always be "Pass". As such, there is also no information provided in this field.</p>	<p>The section has been re-worded to say "metering installation work was completed" instead of "commissioning".</p> <p>The rationale for providing these items is to have a reasonable set of information regarding the installation work in the one communication; and to provide sufficient information to the LNSP of the work undertaken.</p>
40.	Jemena	4.4	Meter Churn	<p>Section 4.4 makes no reference at all to the MP contacting the LNSP. This section does not address the issue of remote acquisition meters which double as network monitoring and operations devices—for example Victorian AMI meters.</p> <p>It is important for both the LNSP and the MDP be notified before the Meter Churn.</p> <p>Jemena suggests AEMO introduces an additional obligation on the MP who undertakes Meter Churn to notify the LNSP before supply is temporarily disconnected. Failure to notify the LNSP may result in 'wasted truck visit' or 'negative customer experience' and a charge to the FRMP, especially if it is an Victorian AMI meter as the temporary disconnection would indicate a loss of supply and result in the LNSP dispatching a faults 'service truck visit'.</p> <p>This notification must be in an agreed B2B procedures format so that it can be consistent across the NEM, standardisation is preferred with the ability for bi-lateral agreement to opt out to a different standards catered for in the final B2B Rules. Jemena considers it would be efficient to have an industry standard, given Meter Churn will become a high volume activity as the meters reach end of life.</p>	<p>Not accepted – AEMO considers that the requirement for the FRMP to notify the LNSP of a planned interruption of supply should be sufficient notice and that no additional procedural obligation is necessary for the MP.</p> <p>Please refer to clause 99A of the NERR.</p>
41.	AusNet Services	4.4	Meter Churn	<p>4.4 The MP must only undertake Meter Churn when... and:</p> <p>a) where the <i>metering installation</i> has <i>remote acquisition</i> of <i>metering data</i> and prior to carrying out the Meter Churn the MP must:</p> <p>(i) make reasonable endeavours to contact the Current MDP and notify the LNSP, and;</p> <p>AusNet Services suggests extending this obligation to also include the LNSP, see the above text in red. This would help reduce the number of wasted truck visits associated with the outage, and improve would the experience of customers calling the network to ask about a power outage (i.e. the MPs meter technician left the premise off supply or the customer doesn't know why the power has gone off).</p>	
42.	United Energy	4.4	Meter Churn	<p>UE again request that AEMO modify clause 4.4 9(a) (i) To also include the LNSP as a party to be notified prior to a Meter Churn occurring.</p> <p>LNSP's require advance notification of a Meter Churn because customers may call Network help lines for an outage unaware that their retailer has organised a meter churn, or network devices can report an outage – in these cases the LNSP is under an obligation to investigate and will be initiating an unnecessary truck callout for a customer off-supply case which will result in wasted truck visit penalties being applied.</p> <p>It is argued by some that the CATS Role change CR's are adequate notification for the LNSP. This is in fact not true. The CATS 6800 role change CR for example requires a proposed change date – but in practice this proposed change date can be very different from the actual change date – so it is quite useless as a reliable advanced indicator of imminent meter churn.</p> <p>UE recommend drafting clause 4.4 (a) (1) <i>to make reasonable endeavours to contact the current MDP and LNSP.</i></p> <p>4.4 (g) there has been no agreement that network devices will be recorded in MSATs, hence the removal of a network device does not need to be recorded in MSATS but does need to be recorded in the metering installation works as we requested in the last round of consultation. Suggest the drafting be amended to all redundant meters be recorded in MSATS and any network devices removed be advised to the LNSP.</p> <p>4.4 (i) the Vic DBs have an obligation under the Electricity Distribution Code to investigate meter tamper and to disconnect sites that may be unsafe. 4.4 (i) needs to include notification to the LNSP. AEMO suggest that this is not the case, before finalising the 1 Sept version of the procedures it would be useful if AEMO confirm in writing that this is consistent with the ESC and ESVs position in Vic. UE note that AGL also supported notification of tampering by the MP to all impacted</p>	

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				registered participants. AEMO suggests that tampering notification be dealt with in the MC-FRMP contract, however the LNSP is not a party to this contract, leaving inconsistency in communication and approach on something as important as theft and safety.	
43.	AGL	4.4(a)(i)	Meter Churn	Where a meter has remote acquisition – the MP should make reasonable endeavours to notify LNSP as well as the MDP that meter is being removed. Eg loss of comms to the meter may indicate to the LNSP that there is a power loss rather than a meter churn, and trigger unnecessary / inefficient field actions	
44.	Momentum	4.4	Meter Churn	(a)(b) where the <i>metering installation</i> does not <u>have remote acquisition of metering data</u> include instrument transformers , the MP must: (i) <u>make reasonable endeavours to contact the Current MP to confirm that Meter Churn is to be carried out; and</u> Momentum suggests the above clause to be rewritten as “make reasonable endeavours to notify the Current MP to confirm that Meter Churn is to be carried out; and”	
45.	AGL	4.1	General commissioning requirements	If a customer is left off supply during a meter churn then the FRMP and LNSP must be notified since they are financially responsible and may be subject to regulatory penalties. Also an issue if the MP disconnect supply to other customers, notification should be made to the LNSP. No obligation regarding a field complaint np notification back to FRMP and LNSP.	Comment noted.
46.	Endeavour Energy	4.3	Notifications following Metering Installation Commissioning	We submitted the below comments in the initial consultation. We note AEMOs’ response of and wish to provide further information. There is a risk that the notification is not implemented in the B2B/SMP from 1 December 2017. Therefore current business practice should continue where MP must provide the notification as per the LNSP’s requirements. Procedural improvement: The content and format for the notification to the LNSP should be defined in a B2B procedure. In the absence of such a B2B Procedure then the existing industry practice should be maintained to minimise cost. We suggest rewording clause 4.3.b to: “Notice of completed metering installation work is sent to the LNSP within 2 business days of completion of the installation. The content and format must be provided as per the B2B Procedures. If the content and format is not defined in a B2B Procedure then the content and formats must be provided as per the LNSP’s requirements.” We would also suggest that table 1 be reworded as ‘example content requirements’.	Endeavour Energy & United Energy - In line with the response on this matter in the draft determination, with regard to development of B2B procedures, AEMO notes the final rule on Updating the B2B Framework, which provides for matters such as these to be considered. AEMO considers that any requirement for an MP to use the B2B procedures in the manner suggested, should be considered in the development of the B2B procedures, not the SLPs. Metropolis – the requirements provided in the current draft are consistent with the requirements for the SLPs. The B2B procedures might provide for a standardised way of communicating to ensure compliance with this requirement.
47.	United Energy	4.3	Notifications following Metering Installation Commissioning	This notification should be in a forme agreed in the B2B procedures so that it can be consistent across the NEM. Standardisation is preferred with the ability for bi-lateral agreement to opt out to a different standards catered for in the final B2B Rules.	
48.	Metropolis	4.3	Notifications following Metering Installation Commissioning	Why is this notification part of the SLP? This is clearly a B2B transaction, and would most appropriately fall under the IEC and B2B.	
49.	Jemena	5.2	Management of Metering Installation Malfunctions	The NER defines <i>metering installation malfunction as follows</i> : The full or partial failure of the <i>metering installation</i> in which the <i>metering installation</i> Clause 5.2 Management of Metering Installation Malfunctions Clause 5.2 stated: The MP must have processes and systems to support the MC in identifying and rectifying a <i>metering installation malfunction</i> in the timeframes specified in clause 7.8.10(a)(1) and (2) of the NER. The specified timeframe in clause 7.8.10 is “ if a <i>metering installation malfunction</i> occurs to the <i>metering installation</i> , cause repairs to be made to it as soon as practicable but no later than 10 <i>business days</i> after the <i>Metering Coordinator</i> has been notified of the <i>metering installation malfunction</i> .” Jemena considers the timeframe for rectifying faulty meters is inadequate, when the meter is faulty to the extent that the customer is without supply. “10 <i>business days</i> “timeframe may be satisfactory for CT metered supply connections, where a faulty meter will not interrupt supply. Jemena suggest AEMO include an obligation to replace faulty meters immediately following advice from the LNSP, who is normally the first responder to supply outage calls from customers.	The NER requirements for repairing a metering installation malfunction are clear; AEMO is not relitigating these requirements through this consultation.
50.	Momentum	6.3	Disaster Recovery	This is section 6.2 in the document: In the event of an IT system failure, the MP must ensure that systems are returned to normal operational service within five <i>business days</i> of the failure, as evidenced by:	Not accepted – AEMO considers the 5 day requirement to be reasonable and comensurate with the activities undertaken by MPs. No information has been provided by the proponent to support a reduction in the requirement from 5 days to 2.

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				Momentum suggest to make this in line with the MDP SLA of 2 days.	AEMO notes that where the FRMP is appointing a contestable MC, they may set more onerous requirements than those considered in the SLP, in their commercial agreements.

Table 4 – Service Level Procedure: Metering Data Provider Services

In the first round of submissions, AEMO acknowledges that a number of comments were made about formatting issues and the need for consistency. AEMO has reviewed the procedure to correct any of these formatting issues. Again in the second of submissions, AEMO received a number of comments about formatting or typographical issues. Where appropriate, AEMO has taken these comments on board. The detailed comments about formatting or typographical errors are not included in the table below.

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1.	Endeavour Energy	1.3	Related Documents	We submitted the below comments in the initial consultation. AEMOs' response is 'Accepted in part – MDFF to be added to the list', however the procedure was not updated as suggested. We have repeated our comments below and request the procedure be updated. Procedural improvement: The following documents should be added: Meter Data File Format Specification NEM12 & NEM13, B2B Procedure	AEMO has updated section 1.3 and included all related AEMO documents. The additional documents referred to have been added. Participants should also note that the list in the table will be alphabetised for the final published version.
2.	Ausgrid	1.3	Related Documents	Cross Reference Error: Is it "Retail Market Procedures..." or "Retail Electricity Market Procedures...". The related document name has been changed but the actual document's name has not changed. Add: B2B Procedures, MDFF Specification, MDM File Format, Special & Technology Sites. Ausgrid contends these documents are equally as applicable to the provision of MDP services as any of the others listed.	
3.	AusNet Services	1.3	Related Documents	AusNet Services questions why has the MSATS Procedures MDM File Format been removed? It's currently mentioned in section 3.5 of the document. We were advised in response to our earlier submission that MDFF would be added but this is not the case.	
4.	Active Stream	2.2	Use of sub-contractors	(g) should be MDP not MP	This clause has been removed as the requirement is already included in section 2.2(g) (of the final version of the procedure).
5.	AGL	2.2(g)		Grammar 2.2(g) does not make sense. Isn't it an AEMO decision if the accreditation review takes place at the next scheduled audit ? The original clauses were clearer.	
6.	Ausgrid	2.2	Use of sub-contractors	Whilst it is clear some attempt has been made to align the requirements, there remains a few minor differences between the respective clauses. For example:- <ul style="list-style-type: none"> MP SLP states 'its obligations' and MDP SLP states 'the obligations' in the lead-in paragraph; and MP SLP has clauses (e) (i) and (e) (ii) whereas MDP SLP has clauses (f) and (g).	Where appropriate, the provision has been updated to ensure consistency with Service Level Procedure (MP).
7.	AGL	2.3(i)(ii)		It was discussed that when a NMIs become a child the network NMI would be abolished and an EN NMI created. AGL supports this position for the reasons discussed at the AEMO workshop. See AEMO notes for supporting reasoning.	Comment noted
8.	Red Lumo	2.3	Specific obligations for MDP - Category D	Recommendation that the following subclause is updated to include 'market child connection point' as an off market child connection point is within and embedded network. (ii) where the connection point has moved within an embedded network and is not a child connection point	AEMO does not consider that further amendments are required. By definition, a child connection point is associated with a Market Participant and therefore can only be an on-market child connection point.
9.	Ausgrid	2.3	Specific obligations for MDP - Category D	Clause (i) (new): MDPs must continue to be allowed to de-activate non-controlled load datastreams for BASIC metering installations when a NMI transitions from 2nd Tier to 1st Tier.	Agreed. Clause 2.3.1(i)(ii) has been added as proposed.
10.	Endeavour Energy	2.3	Specific obligations for MDP - Category D	Procedural improvement: clause 2.3.i should not restrict the MDP from deactivating datastreams when NMI without controlled load transfers from tier 2 to tier 1. This is a common business practice of some MDPs and it would be costly to change with no benefit to the industry. We suggest adding a new subclause of 2.3.j as: "The MDP may deactivate datastreams for a NMI where the <i>accumulated metering data</i> is not required for <i>settlements</i> ."	AEMO agrees that the scenario needs to be covered. Clause 2.3.1(i)(ii) has been added however different wording has been used.
11.	Ausgrid	2.3	Specific obligations for MDP - Category D	Clause (i) (iii): Ausgrid notes the option to de-activate datastreams for de-energised NMIs has been re-introduced to the SLP. This was removed from the 1 st round consultation to avoid the incorrect association with de-activating the data flows to MSATS and the provision of data to market participants. There is currently some confusion in the market as to whether or not an MDP is required to provide metering data to market participants if the MSATS datastreams are made inactive. If AEMO allows an MDP to have the option of de-activating datastreams in MSATS when a NMI is de-energised, then the SLP needs to include:- <ul style="list-style-type: none"> Obligations regarding the continued delivery of metering data to market participants in the event datastreams are made inactive in MSATS; or 	The SLP does not require the MDP to continue to provide data or to attempt to collect data from a metering installation where the datastreams have been made inactive. However, there is nothing in the NER or procedures that prevents parties agreeing to provide such a service over and above the requirements of the SLPs, in their commercial agreements.

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				<ul style="list-style-type: none"> Obligations regarding the detection of supply and/or load and the subsequent notification to the necessary market participants so the NMI Status can be updated. <p>To avoid the need to implement these additional obligations, MDPs must attempt to read ALL meters and provide any Actual data to both AEMO and market participants regardless of the NMI Status, and in the event</p>	
12.	Endeavour Energy	2.3	Specific obligations for MDP - Category D	Procedural improvement: If AEMO accepts that a NMI for a connection point cannot be used for a child connection point then clause 2.3.i.ii would be redundant and should be removed to avoid any confusion.	AEMO considers the current wording to be accurate and necessary.
13.	Ausgrid	2.3	Specific obligations for MDP - Category D	Clause (d): There are no timeframes specified in the CATS procedures relevant to the updating of NMI Datastreams.	There are timeframe requirements for updating standing data in section 2.1(h) of the draft CATS Procedure.
14.	Ausgrid	2.3	Specific obligations for MDP - Category D	Clause (i) (iii): The trigger for this action is the NMI Status in MSATS being changed to “D”. The means by which the NMI has been physically de-energised is irrelevant and in any case, is not known to the MDP.	Not accepted – the SLP provides scenarios where the datastream can be made inactive - this section details valid scenarios.
15.	Red Lumo	2.3	Specific obligations for MDP - Category D	<p>Recommendation that the following clause from the current MDP SLP procedure replaces (i) de-activate Datastreams in MSATS only within this section so as to broaden the scope as to when a Datastream is de-activated and not limit it to the current scenarios provided.</p> <p>(h) ensure that there is no continued metering data being recorded for the connection point before deactivating the data stream(s) in MSATS or discontinuing the collection process from the metering installation</p>	Red Lumo – Not accepted as this is not always the case, or is impractical to do (e.g. where the metering installation becomes a first-tier load and is an accumulation metering installation).
16.	Ausgrid	2.3	Specific obligations for MDP - Category D	<p>Reactive Energy: “... the MDP must process, validate, store and deliver this metering data with the corresponding active energy metering data”.</p> <p>There is currently some confusion in the market as to whether or not an MDP is required to provide Reactive Energy metering data as the SLP only states it needs to be ‘stored’. Ausgrid contends the SLP should be modified to include the obligation to process and deliver this data if it is collected – Especially if the data is required to support the application of a network tariff (ie kVA demand).</p> <p>the reading attempt fails, substitute the data in accordance with the Metrology Procedures.</p>	AEMO has amended the procedure to clarify the matters raised in submissions regarding the storage of reactive energy metering data.
17.	Endeavour Energy	2.3	Specific obligations for MDP - Category D	<p>We submitted the below comments in the initial consultation. We note AEMOs’ response and wish to provide further information.</p> <p>The current wording is ambiguous as it can be interpreted that the MDP only need to store the reactive energy and not process and deliver it. We believe that the intent is that the reactive energy should be processed and delivered with the active energy. We therefore believe that updating the clause accordingly would remove any doubt and confusion.</p> <p>Procedural improvement: The second last paragraph should make it clear that reactive energy must be processed and delivered. We suggest the following reword ‘Where the <i>metering installation</i> includes the measurement of <i>reactive energy</i>, the MDP must store, validate, process and deliver this <i>metering data</i> with the respective <i>active energy</i> in the <i>metering data services database</i>.’</p>	
18.	CitiPower/ Powercor	2.3	Specific obligations for MDP - Category D	<p>REACTIVE ENERGY</p> <p>The NER Rules 7.8.1 and 7.10.5 make it clear that the MC must record, store, collect, process and deliver Reactive Energy, where required, and the AEMO procedures and SLRs should be explicit and consistent with the rules requirements in ensuring that occurs.</p> <p>ie 2.3 Where the <i>metering installation</i> includes the measurement of <i>reactive energy</i>, <u>in accordance with the requirements of clause 7.8.1 (b) and 7.10.5</u>, the MDP must store this <i>metering data</i> with the <i>metering data</i> in respect of <i>active energy</i> in the <i>metering data services database</i>.</p>	
19.	AGL	2.3 p7		<p>AGL notes AEMO’s previous answer, but still does not understand what is intended.</p> <p>The phrase</p> <p>Where the <i>metering installation</i> includes the measurement of <i>reactive energy</i>, the MDP must store this metering data with the metering data in respect of active energy in the <i>metering data services database</i>.</p> <p>Can AEMO please clarify what is meant by</p> <p>... store this <i>metering data</i> with the <i>metering data</i> in respect of <i>active energy</i> in...</p> <p>as it is not clear what is intended.</p> <p>Does this mean that VARh is stored against Wh ?</p> <p>Is active energy the reference point ?</p>	
20.	AGL	2.3 p7		In respect of this same clause, AGL considers that it is only necessary for reactive energy to be downloaded, validated and provided when it supports a network or retail product or service.	

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				At this point AGL does not see any need for this information to be collected and stored in all cases, but not provided when not required. Suggested wording Where reactive energy is required to support a network or retail product or service, the MDP is required to measure, collect, validate the data, store and deliver the data in consistent time intervals with the real energy.	
21.	Active Stream	2.3	Specific obligations for MDP - Category D	Why must reactive energy be stored in the MDM system just because it is in the meter? There is a lot of other data which is also stored in the meter but not stored in the Meter Data Management system. MPs may wish to program meters with Reactive Energy but the MDP may only want to collect and store it when it is required to distribute the Reactive Energy. This flexibility is essential when you consider Reactive Energy for the Mass Market and the possibility of customers moving to Demand Tariffs. The MP should be allowed to setup their meters with E,B,Q,K channels, but the the MDPs should only be required to collect, store and distribute the data that is required by the Market. Suggest re-wording or removing.	
22.	AusNet Services	2.3	Specific obligations for MDP - Category D	“Where the metering installation includes the measurement of reactive energy, the MDP must store this metering data with the metering data in respect of active energy in the metering data services database.” Regarding the above words, AusNet Services considers that this statement is not clear and can easily be misinterpreted. “Where the metering installation includes the measurement of reactive energy, the MDP must store this metering data with the metering data in respect of active energy in the metering data services database.”	
23.	United Energy	2.1	Metering data services	2.1 (f) needs to be expanded to cover ENMs.	Accepted, ENMs added.
24.	AGL	2.1(f)		<u>Embedded Networks</u> This clause does not cover the ENM. Suggest ENM be added so that MDPs must cooperate with ENMs.	
25.	United Energy	3.12	Interface requirements	3.12 (b) needs to be expanded to cover ENMs.	
26.	AusNet Services	3.12	Interface requirements	Regarding 3.12(b) AusNet Services considers the MDP must establish and maintain interfaces to B2B e-Hub with Registered Participants, relevant ENMs, MPs, and for the delivery of metering data to Registered Participants and other MDPs. Providing metering data to ENMs is appropriate because the NER entitles them to the metering data.	
27.	AGL	3.12(a)		<u>Embedded Networks</u> Need to include ENMs within the list as they are not registered participants but accredited participants and not otherwise captured.	
28.	Ausgrid	3.10	Delivery performance requirements for metering data	1st Paragraph: Add “ENM” to delivery participants.	
29.	Red Lumo	3.3	Specific collection process requirements for metering installations type 1, 2, 3 and 4	Confirmation is required from AEMO as to the heading for this section as the draft (clean) procedures currently has: 3.3. Specific Collection Process Requirements for Metering Installations with Remote Acquisition of Metering Data.	Heading reads as intended.
30.	United Energy	3.3	Specific collection process requirements for metering installations type 1, 2, 3 and 4	As we have explained in our general comments (G8) The draft procedure has omitted any service level for remote acquisition meter data collection, whereas the service level exists in Section 3.4 for manually read interval meters. It is critical that the <u>MDP Service Levels</u> include the minimum required read collection frequency & quality for remote acquisition meters to facilitate FRMP and LNSP billing activities. AEMO will be aware that networks must bill no later than business day 10 each month under the NER 6B.A2.4 (a). UE suggests that within this section the following needs to be inserted: (c) use reasonable endeavours to ensure that interval metering data is collected daily; (d) use reasonable endeavours to ensure that the metering data collected is no less than 95% being actual data from meters (with the remainder substituted). This will match the current service levels for Vic AMI Meter Data Publishing, and is appropriate for the broader rollout of Minimum Specification Type 4 meters. UE note that the obligations to provide any minimum data	AEMO disagrees. The collection frequency specified in the Data Delivery Calendar , to support market settlements, adequately covers the network billing matter raised in the submission. AEMO considers that the MDP must put in place processes to collect, process and deliver metering data to meet settlements requirements. The service levels for settlement ready data are specified in section 3.12.4. Section 3.12.2 requires the MDP to deliver metering data to AEMO, the MPD (where applicable) and Registered Participants within two business days of data being received into the metering data services database.

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				<p>quality to AEMO, i.e. 98% actual or sub are not until settlements revisions at 4 or 6 months. Victorian customers have access to online portals with their actual data, accurate network billing monthly, accurate retail bills based on actual rather than estimated data. The minimum being proposed is a substantial departure from the current data standards in Victoria and inconsistent with empowering customers to move to cost reflective tariffs.</p> <p>The proposed procedures are impractical if the normal data collection, data delivery and quality etc. are not clear.</p> <p>In NEM procedures headings have no meaning. Each of the paragraphs in this section needs to be prefaced with “For each metering installation with remote acquisition....”.</p>	<p>Given these requirements, AEMO considers that the issue raised has been adequately addressed.</p> <p>The procedure does not hinder the parties from forming an agreement to deliver beyond these service levels.</p>
31.	AGL	3.3	Specific collection process requirements for metering installations type 1, 2, 3 and 4	<p>There should be obligations for the daily delivery of type 4 interval data</p> <p>There is no requirement for data quality or revision.</p> <p>If the type 4 data is not delivered daily, then an NSRD will be required for incoming parties to know when the data will be delivered.</p>	<p>AEMO disagrees - AEMO considers that retailers will be able to specify their data delivery requirements when agreeing terms with providers for metering services, which may be more onerous than the requirements of this SLP.</p> <p>Refer to AEMO's response to United Energy's submission on section 3.3.</p>
32.	AusNet Services	3.3	Specific collection process requirements for metering installations type 1, 2, 3 and 4	<p>AusNet Services considers that there were previously obligations, see below, in the Metrology Procedures Part A to collect metering data on a daily basis that were omitted from the draft procedures.</p> <p><i>“Metering data is required for all trading intervals on a daily basis at a level of availability of at least 95% per annum from type 1, 2, 3 and 4 metering installations.”</i></p> <p>We suggest that a similar provision is added into section 3.3 of the this procedure to require the collection of metering data on a daily basis, which will improved network billing and settlements efficiency.</p>	
33.	TasNetworks	3.3	Specific collection process requirements for metering installations type 1, 2, 3 and 4	<p>TasNetworks believes there should be a general requirement that data from remotely read meters be collected and delivered daily.</p> <p>Allowing data to be delivered in multi-day quantities will require higher compute power increasing costs to the customer.</p>	
34.	Jemena	3.3	Specific collection process requirements for metering installations type 1, 2, 3 and 4	<p>The draft procedure is inadequate in that it has omitted any service level for remote acquisition meter data collection.</p> <p>It is essential that the MDP Service Levels include the standards for meter data collection frequency and quality for remote acquisition meters to facilitate FRMP and LNSP billing activities.</p> <p>LNSPs must bill no later than business day 10 each month under the NER 6B.A2.4 (a).</p> <p>Jemena suggests that within this section the following needs to be inserted:</p> <p>(c) use reasonable endeavours to ensure that interval metering data is collected daily;</p> <p>(d) use reasonable endeavours to ensure that the metering data collected is no less than 95% being actual data from meters (with the remainder substituted).</p> <p>(e) distribute the data to LNSP's in alignment with the data collection requirements.</p>	
35.	Jemena	3.3	Specific collection process requirements for metering installations type 1, 2, 3 and 4	<p>The draft SLP MDP Services Procedure (Section 3.3) has failed to capture any service level for the collection of meter data from remote acquisition meters (i.e. read meters on a daily basis) and the minimum quality percentage of these readings (e.g. 95% actual readings).</p> <p>This needs to be added into the relevant procedures to clarify the requirements on MDPs to collect Type 1-4 interval data from meters and load into the MDP metering data services database on a daily basis, with a minimum level of quality (actual meter readings).</p> <p>Meter Data is critical to retailer and network billing activities as well as enabling retailers and networks to fulfil their obligations to provide meter data upon the request of the customer. Jemena proposes to include the following:</p> <ul style="list-style-type: none"> • Metrology Procedure Part A, Section 3 – re-insert clause from existing procedures “Metering data is required for all trading intervals on a daily basis at a level of availability of at least 95% per annum from type 1, 2, 3 and 4 metering installations”. • SLP MDP Services Section 3.3 – insert a new clause specifying the critical meter data collection requirementsAu: <ul style="list-style-type: none"> ○ Meter data must be collected on a daily basis for all remote acquisition meters <p>Of the meter data collected, no less than 95% being actual data from meters, with the remainder substituted.</p>	
36.	Red Lumo	3.4	Specific collection process requirements for	<p>Confirmation is required from AEMO as to the heading for this section as the draft (clean) procedures currently has:</p> <p>3.4. Specific Collection Process Requirements for Manually Read Metering Installations</p>	<p>Heading reads as intended.</p>

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ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
			metering installations type 4A, 5 and 6		
37.	Momentum	3.5	Metering data processing requirements	<p>(1) – support the receipt and actioning of Provide and Verify Meter Data Requests in accordance with the B2B Procedures.</p> <p>This clause was struck off from the previous version, however it is quite relevant and hence Momentum would like to ensure that it will be captured in another instrument. Please clarify, thanks.</p>	Requirements for the use of B2B are to be provided for in the NER and the B2B procedures. The right to dispute the data exists regardless of what the procedure states
38.	Ausgrid	3.5	Metering data processing requirements	Paragraph 3: AEMO has been omitted from those parties who can dispute metering data. Re-insert AEMO.	AEMO considers it is not necessary to add 'AEMO' in this provision.
39.	Ausgrid	3.7	Specific Metering Data processing requirements for Special Sites	<p>Paragraph 2: “.... in support of a logical datastream is accepted by the MC, the LNSP, AEMO and the FRMP”.</p> <p>There are many occasions where the LNSP is asked by AEMO to validate and authorise calculations and algorithms associated with logical datastreams. The fact that the RP role has now been removed from the LNSP, it is more prudent than ever that the LNSP is involved in this process.</p> <p>Should AEMO not adopt these changes, it would then be unreasonable to expect the MDP to seek or await authorisation of algorithms from the LNSP.</p>	Agreed. LNSP has been added as one of the parties to approve algorithms for logical NMIs.
40.	Endeavour Energy	3.7	Specific Metering Data processing requirements for Special Sites	<p>We submitted the below comments in the initial consultation. We note AEMOs' response of 'The current procedure does not require LNSP approval. AEMO is happy to consider specific reasons from interested parties regarding the inclusion of the LNSP as a party. AEMO considers that the rule changes do not require change to these clauses.' and wish to provide further information.</p> <p>Historically Endeavour Energy was the MDP for the special sites that are within or on Endeavour Energy's network boundary. However with the introduction of metering competition Endeavour Energy has decided to not provide a contestable metering service. However as a LNSP Endeavour Energy should be a party to approve logical algorithms because if it is within or on our network boundary then we can provide valuable input to help ensure that correctness of the algorithm.</p> <p>Procedural improvement: the LNSP should also be a party to approve algorithms for logical NMIs as it may impact the LNSP if it is done incorrectly. We suggest rewording to 'Each MDP must ensure that any algorithm in support of a logical NMI is accepted by the MC, LNSP, AEMO and FRMP before being used.'</p>	
41.	AusNet Services	3.8	Specific Metering Data processing requirements for metering installation type 7	AusNet Services considers the Load Table is inconsistent with the Glossary. Why has load table been uncapitalised?	
42.	Vector AMS	3.9	Specific Metering Data estimation requirements for metering installation types 4A, 5, 6 and 7	<p>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 substitute 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.</p> <p>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.</p> <p>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.</p>	AEMO has considered the proposal. Whilst AEMO has decided to make no changes to the procedure at this stage, we will consider this model in further consultation with interested parties in subsequent workshop sessions.
43.	Ausgrid	3.9	Specific Metering Data estimation requirements for metering installation types 4A, 5, 6 and 7	<p>Rewrite 1st Paragraph:-</p> <p>“Each MDP must have a process for the creation of <i>estimated metering data</i> for <u>metering installation</u> types 4A, 5, 6 and 7”.</p>	Agreed. Procedure has been updated.
44.	AGL	3.10	P12	<p>Many participants have indicated that there is an expectation that 100% of data is delivered.</p> <p>The AEMO comment that the FRMP may contract for a higher standard seems inadequate in the operation of a national market.</p> <p>AEMO should also note that the FRMP may not be contracting all MCs, and that the LNSP and LR do not contract the MCs for the delivery of what should be BAU meter data.</p> <p>Retailers and other parties have regulated obligations (eg customer bills) which require that data to be delivered within a reasonable time.</p>	This is an existing requirement and AEMO does not consider that the NER changes require any amendment to these sections as proposed. Note that the FRMP is not hindered by the NER in establishing commercial arrangements that require the delivery of data to a higher standard and on a more frequent delivery schedule.

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				Why does AEMO consider it satisfactory that only 98% of meter data is delivered ? Data quality only applies to AEMO – not participants	
45.	AGL	3.10	Delivery performance requirements for metering data	Initial clauses need to be re-written to establish a better process of data delivery between parties. Substitution of data should apply on meter churn.	Comment noted.
46.	AusNet Services	3.10	Delivery performance requirements for metering data	AusNet Services notes that below were modified with the following words highlighted in yellow being added. “a) deliver to AEMO, the New MDP when there has been a Meter Churn and Registered Participants all Actual Meter Readings that passed Validation within two business days of the Actual Meter Readings being received into the metering data services database;” “(b) Substitute, Validate and deliver to AEMO, the New MDP when there has been a Meter Churn and Registered Participants the substituted metering data within two business days of the Actual Meter Readings being received into the metering data services database and failing Validation; and” “(c) Substitute, Validate and deliver to AEMO, the New MDP when there has been a Meter Churn and Registered Participants the substituted metering data within two business days of the receipt of any fault reason codes associated with a reading failure or failed interrogation event, into the metering data services database.” With the addition of these words in section 3.10 above, we are concerned that the BAU delivery services have been removed as these clauses can now be interpreted as only requiring data to be delivered when there has been a Meter Churn. If the intention of this was to advise that you only need to deliver meter data to the new MDP when there has been a Meter Churn it needs to be re-worded to clearly state that without it being able to be misinterpreted. It should also remove the reference to normal expected metering data delivery in the last sentence of 3.10.	Accepted in part – whilst AEMO considers that the wording is clear and correct as drafted, to avoid any potential confusion, a comma has been added through this section to clarify it further still.
47.	Ausgrid	3.10	Delivery performance requirements for metering data	Clause (f): Amend clause to specify the use of MDFF and B2B as the format and delivery method respectively for metering data between MDPs. The ability to provide data in an alternate format and/or by an alternate method is covered in clause 8.1 but the default method should be NEM12 and B2B. Note: Clause 3.1 (f) already states a requirement for the “loading of <i>metering data</i> provided in MDFF files relating to Meter Churn”.	Accepted in concept. The provision has been re-worded to clarify the requirement and create a default arrangement, noting that the section 8.1 is not relevant to MDPs as they are not Registered Participants.
48.	Red Lumo	3.10	Delivery performance requirements for metering data	Recommend that 6.11.9 Summary Data Delivery Table which is in the current MDP SLP procedure is reinstated with the removal of (f), (g) & (h) which provides the information in a clear and understandable method.	AEMO considers that the table in section 6.11.9 in the current procedure does not state a requirement. The requirements are now stated in section 3.12.5.
49.	TasNetworks	3.10	Delivery performance requirements for metering data	The result of the changes is that there is no requirement to deliver data to AEMO or participants. The table in 6.11.9 of current SLP should be re-instated.	
50.	AGL	3.10	P12	Data delivery for participants What is normal expected data delivery ? Re-instate table 6.11.9	
51.	United Energy	3.10	Delivery performance requirements for metering data	Suggest this is reworded to describe a more logical order of delivery to AEMO and Registered Participants, and to the New MDP where there has been a Meter Churn. UE has made a number of drafting suggestions in Schedule 1 , which follows at the very end of this response. Many of the subclauses in this section reference the potential for bilateral agreements. AEMC made it clear in the NER in 7.10.3 regarding the provision of metering data, that the MDP must provide metering data, yet there is no specific collection, validation and delivery timeframe to make it clear when data will be delivered in respect of a day for remotely read meters. AEMO should state that data should be collected daily for remotely read meters as a default unless otherwise agreed, and a with delivery timeframe of within 2 days to registered participants If AEMO adopt an alternative approach that is not consistent with jurisdictional legislation for data delivery in Victoria, then at least AEMO needs to add further text in the lead in clause to (a)...’ by 5pm on the day specified in the timetable each settlement week’. At the very least the procedures should stipulate that MDP must at a minimum provide metering data that is required by that person to perform their obligations under the Rules, the National Energy Retail Rules or jurisdictional electricity legislation.	AEMO disagrees – the procedure provides clarity on the expectations for collection, processing and delivery of metering data. The procedure does not include a requirement for daily reading of remotely read interval metering as the Data Delivery Calendar referred to in this section does not currently require daily reading. Should a commercial arrangement be established for an MDP to collect data more frequently than required by the Data Delivery Calendar, the MDP would be required under this procedure, to provide metering data to parties within 2 business days following collection. Whilst AEMO is aware of specific jurisdictional provisions for metering installations installed as part of the VIC AMI rollout, the scope of those requirements is restricted to VIC AMI installations, has been in place for some time outside of AEMO procedures, and does not need to be considered further in this AEMO procedure. AEMO considers that the table in section 6.11.9 of the current procedure does not state a requirement. The requirements are now stated in section 3.12.5.

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				<p>The draft version of the MDP SLP has removed material that exists in the current version (e.g. 6.11.9) which clearly explained that where configured, both E and B streams are required in an MDFF file and not just N streams. The draft version is less useful with the removal of such information. Clear requirements around the delivery of the correct datastreams is necessary so that jurisdictional feed in tariff schemes are able to be billed and generation datastreams are also required for network planning and loss factor calculations. See Schedule 1 for amendments to sub clause (g) to make this clear, in line with the current Summary data delivery table in 6.11.9.</p> <p>The current MDP clause 6.6.1 (b) requires the MDP to have capability to support provision and verification of metering data. This clause also supports the right to dispute metering data in the proposed clause. UE suggest that this clause be re-inserted at the end of 3.10.</p>	<p>The NMI procedure specifies the datastreams for each metering installation type and the MDFF specification specifies which datastreams are required in a MDFF file. As such, AEMO considers the proposed changes are not necessary.</p> <p>(Note: refer to United Energy’s submission document for details proposed as “Schedule 1”)</p> <p>The B2B Procedures might provide a mechanism to support these activities. This is a matter for the IEC to consider.</p>
52.	AusNet Services	3.10	Delivery performance requirements for metering data	<p>AusNet Services still disagree with timetable being here.</p> <p>This is the meaning of <i>timetable</i> in the rules. Please advise where it mentions settlements or data delivery!</p> <p>timetable</p> <p>The timetable published by AEMO under clause 3.4.3 for the operation of the <i>spot market</i> and the provision of <i>market</i> information.</p> <p>3.4.3 Spot market operations timetable</p> <p>(a) AEMO must operate the <i>spot market</i> according to the <i>timetable</i> which must be approved by the AEMC and published by AEMO following compliance with the <i>Rules consultation procedures</i>.</p> <p>(b) If AEMO wishes to change the <i>timetable</i> at any time, it may do so following compliance with the <i>Rules consultation procedures</i>.</p> <p>(c) If AEMO amends the <i>timetable</i> in accordance with paragraph (b), AEMO must:</p> <p>(1) <i>publish</i> the amended <i>timetable</i>; and</p> <p>(2) operate the <i>spot market</i> according to the <i>timetable</i> as amended.</p>	<p>Agreed, the cross-reference is now to the “Data Delivery Calendar”.</p>
53.	AGL	3.11	Delivery of Metering Data for Prudential Purposes	<p>What does the term ‘accepted’ mean ?</p> <p>What is the standard for accepted ?</p> <p>Data should be validated and actual interval metering data.</p>	<p>A defined term of “Actual Metering Data” is now used.</p>
54.	United Energy	3.11	Delivery of Metering Data for Prudential Purposes	<p>Clause (a) (i) and (ii) use the term accepted. The correct term consistent with the current MDP SLP is actual. Actual data is preferred for settlement when there is an imminent failure of a participant in the market.</p> <p>Clause (a) (ii) should refer to remotely read meters as clause (b) deals with manually read meters.</p>	<p>A defined term of “Actual Metering Data” is now used.</p>
55.	Ausgrid	3.12	Interface requirements	<p>Clause (b): Has been incorrectly edited. Currently reads ‘... Registered Participants, , MPs and for ...’. MPs should be deleted.</p> <p>What about ENMs?</p>	<p>Agreed. “MPs” has been removed and “ENMs” has been added.</p>
56.	Ausgrid	4.1	System Requirements	<p>Clause (a): Ad “Hazards” to the specified information.</p>	<p>Agreed. ‘hazards’ has been added to the requirement.</p>
57.	Ausgrid	5.1	Meter churn scenarios	<p>General: Ausgrid notes our suggestion to allow 30 minute interval data to be split into 15 on the meter churn data has been rejected.</p> <p>Ausgrid contends that allowing the MDP to ‘split’ 30 minute intervals into 15 minute intervals on the day of meter churn is good outcome for the industry. In circumstances where a 15 minute meter is replaced by a 30 minute, the following will play out if the obligations remain unchanged:-</p> <ul style="list-style-type: none"> Old MDP will provide 30 minute interval data to the FRMP and LNSP for the day of meter churn while the while the change request remains pending. New MDP will provide 15 minute interval data to the FRMP and LNSP for the day of meter churn following the transfer of the MDP role until meter churn data is received from the Old MDP. New MDP will provide 30 minute interval data to the FRMP and LNSP for the day of meter churn once meter churn data is received from the Old MDP. <p>This process has the recipient so the data receiving 30 minute data, then 15 minute data then 30 minute data again for the same day and all within the space of a few days. This is completely unnecessary.</p> <p>A simple procedural change to allow the New MDP to ‘split’ the 30 minute churn data into 15 minute intervals prevents one set of unnecessary system configuration changes and avoids the likelihood of PMDs and VMDs being raised.</p> <p>Scenario 1 Clause (d): “Any redundant Datastream(s) are made inactive ...”</p> <p>Scenario 2 Clause (c): “Any redundant Datastream(s) are made inactive ...”</p> <p>Scenario 3 Clause (d): “Any redundant Datastream(s) are made inactive ...”</p>	<p>Agreed. Procedure has been updated.</p>

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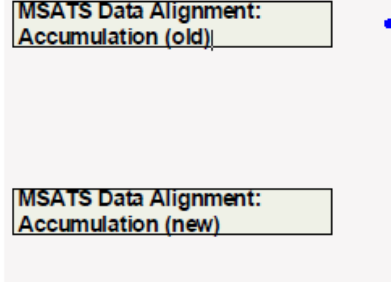
ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
58.	Origin Energy	5.1	Meter churn scenarios	 <p>Origins original response requested the titles to be updated to <i>MSATS and MDFF Data Alignment Accumulation</i> and the AEMO response was <i>noted</i> but no changes have been made in the diagram titles.</p>	AEMO does not believe a change to the provision is warranted. The link to MDFF is made clear in the text.
59.	TasNetworks	5.1	Meter churn scenarios	The result of the rule change is that Scenario 1 is no longer allowed. It should be removed.	The scenarios have been retained in the case that meter churn of this nature is allowed. The ability for parties to undertake one type of meter churn or another is not captured here, instead this procedure sets the requirements in the case that it does occur.
60.	Pacific Hydro	6.1	Metering Data Archival and Recovery	Suggest the following: The Metering Data Provider MDP must have retrieval mechanisms that allows the archived metering data (both that which is available online and or archived) <i>archived metering data (both that which is available online and or archived)</i> retained in its metering data services database under clause 7.10.2 of the NER to be accessed, recovered, re-evaluated and delivered in agreed timeframes to AEMO and <i>Registered Participants</i> .	Accepted with modification.
61.	AGL	8.1	Bilateral agreements	AGL seeks to understand why AEMO should be able to access bilateral agreements between participants. These are commercial in confidence arrangements between parties which do not impact market operation. AGL does not see an appropriate justification for AEMO to have access to these bilateral arrangements.	The provision specifies that the agreement is only to be made available on request, for audit purposes.
62.	United Energy	8.1	Bilateral agreements	The meter data services obligations need to be consistent with the requirements on persons under the NER, NERR/NERL and jurisdictional instruments, this is currently not the case. The normal expected meter data service referred to in MDP SLP needs to be properly defined for all attributes of the services – datastream, data completeness and data quality, method of delivery and timeframe of delivery to registered participants. Bi-lateral agreements are only practical where the data format, datastreams delivered (E/B), method of delivery and required timeframe to deliver data is clear and unambiguous. This is currently not the case in this draft of the MDP SLP.	Refer to AEMO's responses to United Energy's comments in section 3.3 and section 3.10.

Table 5 – Meter Data File Format Specification

In the first round of submissions, AEMO acknowledges that a number of comments were made about formatting issues and the need for consistency. AEMO has reviewed the procedure to correct any of these formatting issues. Again in the second of submissions, AEMO received a number of comments about formatting or typographical issues. Where appropriate, AEMO has taken these comments on board. The detailed comments about formatting or typographical errors are not included in the table below.

ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
1.	Momentum	1	Introduction	<p>ENM is also a Registered Participant as per the Rules, reference below:</p> <p>C.1.1 Gaining accreditation</p> <p>The final rule sets out key requirements for interested parties to be able to provide embedded network management services.</p> <p>First, an embedded network manager must be accredited and registered by AEMO as an embedded network manager. To allow this to occur the final rule requires AEMO to</p>	<p>MPs, MDPs and ENMs are not <i>Registered Participants</i>. This is in spite of the fact that Chapter 7 specifies that ENMs must be registered and accredited with AEMO. The definition of <i>Registered Participant</i> in Chapter 10 of the NER is amended by National Electricity Amendment (Embedded Networks) Rule 2015 No. 15. These are the relevant parts of the amended definition:</p> <p>A person who is registered by AEMO in any one or more of the categories listed in rules 2.2 to 2.7. However:</p> <p>...</p> <p>(c) as set out in clause 8.2.1(a1), for the purposes of some provisions of rule 8.2 only, ... and <i>Embedded Network Managers</i> who are not otherwise Registered Participants are also deemed to be <i>Registered Participants</i>; and</p> <p>(d) as set out in clause 8.6.1A, for the purposes of Part C of Chapter 8 only, ... and <i>Embedded Network Managers</i> who are not otherwise <i>Registered Participants</i> are also deemed to be <i>Registered Participants</i>.</p> <p>Hence, they are only deemed to be <i>Registered Participants</i> for very limited purposes.</p>
				<p>For simplicity, can this be worded as “This document specifies the Meter Data File Format (MDFF) to be used by MDPs for the provision of metering data to Registered Participants (including MPs, ENMs and MCs)</p>	<p>That is not an appropriate amendment as ENMs and MDPs are not <i>Registered Participants</i>.</p>
2.	Endeavour	1.2	Definitions and Interpretation	<p>Procedural improvement: The current version of the document states that “In this document, a word or phrase that is <i>in this style</i> (i.e. italicised and underlined) is a reference to a specific field or record within the MDFF.” This statement should be re-inserted in section 1.2 so that it is clear to the reader what these words and phrases mean.</p>	<p>We anticipate amending the Glossary to include this additional type of defined term in the future.</p>
3.	Ausgrid	2(c)	General Rules and Information	<p>Clause 2 (c): Ausgrid contends that the wording of this clause is ambiguous - Specifically the term 'read event'. There are instances where all the data collected from a 'read event' cannot be contained within a single 100-900 block on account of the file size limitation imposed by B2B. This can occur when more 6 months of interval data is collected from an MRIM metering installation containing multiple datastreams or a participant requests large periods of data via the PMDR/VMDR process.</p> <p>The clause needs to be reworded such that 'the MDP ensures all suffixes associated with a NMI/IntervalDate are included in the same 100-900 event block'. This will force and MDP to split a 'read event' in such a way so as to meet this requirement.</p>	<p>Accepted in concept, see amended clause.</p>
4.	Endeavour			<p>Procedural improvement: Currently the obligation in clause 2(c) is on a reasonable endeavour and this should be maintained because the 1MB file size restriction in the B2B procedure means that there are scenarios where complying with this obligation at all times would be complex and costly to implement. We suggest rewording clause 2(c) to:</p> <p>“The MDP must use reasonable endeavours to ensure that all NMI suffixes associated with a NMI for a single read event/date are included in the same 100-900 event block.”</p>	<p>Change of wording has removed the need to add “reasonable endeavours”.</p>
5.	ActewAGL	3.2	File delivery	<p>3.2.2. (a) dot point:</p> <ul style="list-style-type: none">Extension =.zip (See Compression rules in paragraph (b)). <p>Entire Clause is referring to standalone .csv, but dot point .zip is included here. Where is the .csv extension? Change to Extension = .csv</p>	<p>Reference to .zip extension deleted it. File compression is described in 3.2(b).</p>
6.	Ausgrid	3.3	File construction	<p>The MDFF specification still needs to include an application hierarchy for instances where more than one (1) Reason Code is applicable for a single interval.</p> <p>Ausgrid suggests:</p> <ul style="list-style-type: none">(1) Tamper;(2) Power Outage; and(3) Time Reset. <p>Surely each MDP is not expected to negotiate this hierarchy with each of the 200+ registered retailers?</p>	<p>AEMO considers 3.3.5(a) provided sufficient guidance to resolve this matter.</p> <p>The MDP is best placed to provide the reason code most applicable to the metering data provided.</p> <p>The procedure does not mandate that each MDP negotiates a hierarchy.</p>

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7.	Jemena	3.3.4	Index Read for type 4A and type 5 Metering Installations	The Victorian Energy Retail Code requires a start index read on customers' bills. This requirement is a key customer protection. Jemena believes customers with Type 4 should also be accorded with the same level of customer protection. We suggest Type 4 should be included in the heading of clause 3.3.4.	<p>The Victorian Energy Retail Code obligations apply in Victoria regardless of what this document provides.</p> <p>AEMO considers that index reads for type 4 metering installations can be covered in commercial arrangements where parties have either a requirement or desire to acquire the index read.</p>
8.	Jemena	3.3.4	Index Read for type 4A and type 5 Metering Installations	If AEMO includes Type 4 in the clause 3.3.4, then we suggest in 3.3.4 (a) refers to 'at the time of collection' to cover manually read meter types and 'at the time of the meter reading event' to cover Type 4. The index reads for Victorian AMI interval meters are provided as at midnight so that they represent the end of day index read even though interval data is collected on the wireless mesh for the few hours following midnight.	
9.	Red/Lumo			<p>Red and Lumo recommend that 3.3.4 is updated to the following: "Index Read for type 4, 4A and 5 Metering Installations."</p> <p>Our proposed recommendation is consistent with our existing Victorian obligations. These obligations are found in the current Essential Services Commission Energy Retail Code version 11, where the index read is associated with smart meters. See: http://www.esc.vic.gov.au/wp-content/uploads/esc/2a/2a0c8726-1a0b-4671-ba4e-da14178f92fe.pdf Definition: index read in relation to <i>smart meters</i> has the meaning given under the Meter Data File Format Specification NEM 12 and NEM 13 published by the Australian Energy Market Operator smart meter means an interval meter that meets the functionality requirements set out in the <i>Functionality Specification</i> and: (a) is designed to transmit <i>metering data</i> to a remote location for data collection; and (b) does not, at any time, require the presence of a person at, or near, the <i>meter</i> for the purposes of data collection or data verification (whether this occurs manually as a walk-by reading or through the use of a vehicle as a close proximity drive-by reading), including, but not limited to, an interval meter that transmits <i>metering data</i> via direct dial-up, satellite, the internet, general packet radio service, power line carrier, or any other equivalent technology The following clause indicates that the index read is to be displayed on a <i>small customer's</i> bill. 25 Contents of bills (SRC and MRC) (1) A <i>retailer</i> must prepare a bill so that a <i>small customer</i> can easily verify that the bill conforms to their <i>customer retail contract</i> and must include the following particulars in a bill for a <i>small customer</i>: (y) if a <i>customer's</i> bill is derived from interval data from a <i>smart meter</i>: (i) the <i>index read</i> at the end of the billing period; and (ii) the <i>index read</i> at the start of the billing period; and (iii) the actual tariffs; and (iv) the total amount of electricity (in kWh) consumed in each period or class of period in respect of which a relevant tariff applies to a <i>customer</i>.</p>	
10.	AusNet Services			In relation to the provisions AusNet Services firstly wishes to advise that the heading has no legal meaning and (b) applies for every meter type. Secondly, the Victorian government has obligations on retailers in the Electricity Retail Code to provide the index read on the bill for smart meters. Hence the concept of Index Read must be introduced for small customers with type 4 meters and for VICAMI meters.	
11.	AusNet Services			<p>Additionally, the 3.3.4. (a) should be changed to allow the retrieval of the total accumulated metering data at the previous midnight. This approach better allows for more reproducible figures when comparing daily interval metering with the index read for the datastream, and hence less customer complaints. (a) The index read is the total <i>accumulated metering data</i> for a Datastream retrieved from a <i>meter's</i> register at the time of collection previous midnight.</p>	
12.	Origin	3.3.4(a)		<p>(a) The index read is the total <i>accumulated metering data</i> for a DataStream retrieved from a <i>meter's</i> register at the time of collection and must be the index read as of 00.00 for that day. The index reads needs to be as of midnight to ensure any jurisdictional requirements to include the index read aligns on a customer bill with the meter data for the period. Not having a index read provided where a customer transfer completes as of midnight may lead to erroneous or calculated index reads having to be included on customers' bills</p>	<p>AEMO disagrees – the proposed alteration appears contradictory in that the index read would only be the accumulated metering data retrieved from the meter's register at 00.00 if the accumulation metering data was retrieved at 00.00. 3.3.4(e) allows parties to agree to provide an index read for a time other than the time of collection</p>
13.	United Energy			3.3.4 (a) – remove the words 'at the time of collection' which have been added and revert to the current wording 'at the time of the meter reading event'. The index reads for Victorian AMI interval meters are	

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				provided as at midnight so that they represent the end of day index read even though interval data is collected on the wireless mesh for the few hours following midnight. UE does not consider this process should be changed as the index reads at midnight are more representative of the index reads and the complete days aggregated interval data on a retail bill. Unnecessary change would increase costs and not benefit customers.	believe that we were making the provision clearer by specifying the time of the collection, which is effectively when a meter is read/data is downloaded. We do not expect any change to the current process described in the submission as a result of this drafting change
14.	TasNetworks			<u>3.3.4 Index Reads</u> TasNetworks believes that index reads should be; <ul style="list-style-type: none"> - Mandatory to collect & deliver. Currently (b) in this section implies that it is optional. Collected and delivered for Type 4 also to provide consistent processing.	The Victorian Energy Retail Code obligations apply in Victoria regardless of what this document provides. AEMO considers that index reads for type 4 metering installations can be covered in commercial arrangements where parties have either a requirements or desire to acquire the index read.
15.	United Energy	3.3.4(b)		3.3.4 is titled index reads for types 4a and 5 metering installations. The drafting is changed to suggest that index reads only need to be provided when collected. Firstly the heading in NEM documents generally has no meaning, the linkage of which MDFF files need/should have an index read needs to be clear in the drafting of the clauses. The Energy Retail Code requires a start index read on customers' bills where they have a smart meter in Victoria. This was seen as a key customer protection in the roll out of new metering technology since 2012.	
16.	United Energy AGL			UE queries why a similar level of customer protection should not be provided to customers with the new Type 4 meters, and why then the requirement for an Index read is not extended to the new Type 4 meters. Whilst legacy systems may not be able to provide an index read for old type 5s or 4s, new systems could design this requirement in. Jurisdictions should consider if this is a 'must provide' obligation for any small customer interval meter or not and this should be clear in the final version of this document in Sept 2016.	
17.				An index read is required to be provided to customers on their bills (i.e. the Victorian Energy Retail Code (CI 25(y)) and should be aligned to read events. Since index reads are required for type 4A and 5, AGL believes that this clause should be amended to require index reads for type 4 as well, as this will be necessary for small customer bills.	
18.	Energy Australia			EA believes that this rule should be amended to require index reads for type 4 as well as 4A and 5 (refer to CI25(y) of the Energy Retail Code of Victoria).	
19.	Ausgrid			Clause 3.3.5: AEMO has not completely addressed the issue. The MDFF specification only allows for one (1) Reason Code to be applied to an Actual (A) flagged interval in the 400 record:- "The <i>StartInterval / EndInterval</i> pairs must be presented in ascending record order. The <i>StartInterval / EndInterval</i> period must cover an entire day without gaps or overlaps . For example, (based on a 30 minute interval length): 400, 1,26 ,A,, 400, 27,31 ,S53,9, 400, 32,48 ,E52,,"	AEMO considers that this has not changed from the current procedure. The respondent is requested to raise this matter at the MDP forum if it considers there to be an issue.
20.	United Energy	3.3.5	Reason Code	3.3.5 UE agrees with Ausgrid that a standard hierarchy of reason codes should be used as opposed to one agreed between the retailer and MDP, which may result in important codes from a network perspective being overlooked or underestimated in any negotiated hierarchy between FRMP and MDP. For example Distributors have obligations in relation to meter tampering and safety in the regulatory framework and should be advised of meter tampering in a consistent manner.	AEMO considers any issue relating to tampering or safety would be communicated between parties in order to meet legislative requirements within each jurisdiction, which would override this procedure insofar as electrical safety matters are concerned. Further, the MDFF is not designed to be a mechanism for incident or hazard reporting, or to be a principal mechanism for communicating matters relating to health, safety and the environment.
21.	AusNet Services	3.3.5(a)		Regarding 3.3.5a AusNet Services suggests adding in agreement with the FRMP has just added inefficiencies to the process. The current procedures allows the MDP to prioritise the Reason Codes as they're in the best position to know which ones are critical to participants. Adding this agreement has just put another step in the process which would inhibit MDP's from automating this type of process as we would have to get agreements from every FRMP everytime we had more than one reason code. We do not think this adds value or benefits to the process.	The MDP is required to provide the reason code most applicable to the metering data provided. The MDP must only apply a structure agreed with a FRMP in the case that they have agreed such a structure. The procedure does not mandate that the MDP forms an agreement with the FRMP.
22.	United Energy			3.3.5 (a) should be amended to deliver a consistent industry agreed prioritisation of significant reason codes for use by all stakeholders. The drafting replaced 3.3.5 (g) which recognised that the most critical reason code for registered participants, MPs or LNSPs was what would be included. It is important that safety is consistently the first priority for LNSPs, customers, Metering parties and retailers. A number of participants have requested that AEMO re-instated 3.3.5 (g) – Powershop, Momentum, Lumo and Red, AGL. UE supports this approach suggest re-insert the clause.	AEMO considers that the FRMP is best placed and incentivised to determine a hierarchy with the MDP (if they choose to do so) as they are the principal in appointing providers at a metering installation. In the case where the DNSP is the MC, MDP and MP, they will already be in receipt of the information.
23.	United Energy			This clause is another example where the heading has no meaning and each of the sub clauses need to be linked to an obligation relating to meter type.	It is fine as drafted. The introductory sentence does what it is intended to do.

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24.	Active Stream			Tamper alarms should not be sent via MDFF. There are a lot of tampers that are created when installations or maintenance (eg.faults) are performed at the site. As a result a level of investigation must be performed by the back office before confirming that a tamper is legitimate. These legitimate tampers must be notified to the MC and the LNSP, but not using the MDFF. This is not practical and is an expensive solution to implement.	The requirement relates to the provision of a reason code in the MDFF, not the provision of a tamper alarm to any party in particular.
25.	ActewAGL	4	Interval Meter Reading File Specification and Validation (NEM12)	Nowhere in the examples or appendix does it show where the CRLF goes for any line. Should the 100 or 900 record have a CRLF or not? Currently receive both.	No change. Refer to clause 3.3(b). The Procedures states that all lines must end with a carriage return line feed (CRLF).
26.	Momentum			<div> <div>ToParticipant</div> <div>VarChar(10)</div> <div>M</div> <div>The MSATS Participant ID of the intended Registered Participant, MDP or ENM.</div> </div> <p>Does this mean ENM is not a Registered Participant? As per the Embedded Network Rules, it's a registered participant hence calling it out explicitly is causing a bit of confusion while reviewing. Momentum proposes to replace with the below: The MSATS Participant ID of the intended Registered Participant (including ENM or MC) or MDP.</p>	Refer to comment #1. The ENM is not a Registered Participant, hence no change is required.
27.	United Energy			UE believes that the inclusion of MDP in the To Participant field is provided only for the purpose of publishing of Churn Data by the Old MDP to the New MDP and no other purpose.	Noted.
28.	Origin			<p>This should be updated to read ' this field should not be provided for remotely read meters' as the data will be delivered daily</p> <p>Where the NSRD is provided in the MDFF, due to other Metrology procedures a PMD cannot be sent to request the data until after the NSRD. Where a meter is being remotely read either via VICAMI or as a new Type 4, there isn't an NSRD as the meter is read daily, however by providing an NSRD in the MDFF it prevents the FRMP/LR being able to follow up on missing data until this date is reached.</p> <p>This isn't the intent or purpose, but having it written into the rules will prevent a participant following up on missing data</p>	No change. AEMO considers the requirements are reasonable as manually read meters require an NSRD. Remotely read meters do not require an NSRD.
29.	Ausgrid	4.3	NMI data details record (200) (NextScheduledReadDate)	<p><u>Meter Serial Number</u></p> <p>The re-wording of the MeterSerialNumber definition is clumsy. Suggested re-wording:- "The faceplate serial number as per MSATS Standing Data for the respective IntervalDate. This should be the new Meter serial Number on an IntervalDate where a meter has been replaced."</p>	AEMO considers the current defintion is appropriate. Refer to the definition of Meter Serial ID in the Glossary.
30.	Endeavour	4.3	MeterNMI data details record (200) (Meter Serial Number)	Procedural improvement: The definition of the MeterSerialNumber field should make this field mandatory for historical data given that the equivalent field in MSATS is mandatory. This is required to allow linking of the metering data to key standing data in MSATS.	As this is a current requirement, AEMO does not see a compelling reason to change.
31.	Endeavour			<p>We submitted comments in the initial consultation and have noted AEMO's response and wish to provide further feedback with an alternate suggestion.</p> <p>AEMO's rewording to the MeterSerialNumber field definition does not provide any further clarity because it only references the Standing Data for MSATS document and does not point to which clause or field. We maintain that this should be reworded to use terms defined in the glossary to avoid any confusion. Also the word 'must' is more appropriate than 'should'.</p> <p>Procedural improvement: The definition of the MeterSerialNumber field should use terms defined in the glossary to avoid any confusion. We suggest that this be reworded to: "The Meter Serial ID. This must be the Meter Serial ID of the removed meter for IntervalDate prior to the meter replacement and the Meter Serial ID of the installed meter on the IntervalDate when the meter is replaced."</p> <p>Note that we have also suggested rewording the definition of Meter Serial ID in the glossary to: 'A serial number that uniquely identifies each <i>meter</i> associated with a <i>NMI</i>. This serial number must be prominently visible on the front of the meter.'</p>	Agreed. We have amended the description and the definition slightly differently, however.
32.	Ausgrid			<p><u>RegisterID</u></p> <p>Field Requirement should read "M/N".</p>	Agreed.
33.	Endeavour			Procedural improvement: The definition of the RegisterID field should make this field mandatory for type 1-3 given that the equivalent field in MSATS is mandatory. This is required to allow linking of the metering data to key standing data in MSATS.	This is the current requirement, AEMO does not see a compelling reason to change this.

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34.	Momentum	4.3	NMI data details record (200) (RegisterID)	The “Field Requirement” column should have N as well as M , because of the Definition that says “Not required for types 1-3 and type 7 or when sending metering data to another MDP (eg Meter Churn data). Please retain “M/N” instead of only “M” – “R” however can be left deleted.	Agreed.
35.	United Energy			UE welcomes the inclusion of Register ID as a mandatory field within Type 4 NEM12 file format.	Noted
36.	Red / Lumo	4.4	Interval data record (300)	<p>Field = <i>ReasonCode</i></p> <p>Definition = Summary of the reasons for Substitute/Estimate or information for all <i>IntervalValues</i> contained in this record.</p> <p>The <i>ReasonCode</i> applies to all <i>IntervalValues</i> in this record.</p> <p>Not required if quality flag = “N”, or “E”, but can be provided for information.</p> <p>The field must not be populated if quality flag = “V”.</p> <p>Allowed values: Refer Appendix E</p> <p>The current version of the Meter Data File Format Specification has the following definition for this field and includes ‘A’:</p> <p>Summary of the reasons for substitute/estimate or information for all <i>IntervalValues</i> contained in this record.</p> <p>The <i>ReasonCode</i> applies to all <i>IntervalValues</i> in this record.</p> <p>Not required if quality flag = “A”, “N”, or “E”, but can be provided for informational purposes.</p> <p>The field must not be populated if quality flag = “V”.</p> <p>Allowed values: Refer Appendix E.</p> <p>Suggestion is for the definition to remain as per the current definition within version 1.02 to include the ‘A’</p>	Agreed. “A” has been included
37.	Jemena	4.6	B2B details record (500)	<p>The definition for field <i>RetServiceOrder</i> states:</p> <p>“The <i>retailer’s</i> Service Order number associated with the reading event for that <i>day</i> (where the reading is directly associated with a B2B Service Order request).</p> <p>This information must only be provided to the Retailer who issued the B2B Service Order request <u>and the LNSP.</u>”</p> <p>Jemena proposes that the LNSP included as a recipient of the MDFF files as well.</p>	Accepted in concept. Procedure has been re-worded.
38.	Red / Lumo	4.6 B2B details record (500)		<p><i>Index Read</i> definition is to be updated within the table (page 15 clean draft) to the following as per the response provided for 3.3 File construction:</p> <p>The total recorded <i>accumulated energy</i> for a Datastream retrieved from a <i>meter’s</i> register at the time of collection.</p> <p>For type 4, 4A and type 5 <i>metering installations</i> the MDP must provide the <i>IndexRead</i> when collected. Refer section 3.3.4.</p>	See above.
39.	United Energy			<p>The purpose of the 500 record is to allow a correlation between interval data obtained as a result of a manual read with the Retailers originating service order.</p> <p>Whilst the LNSP mostly will have no interest in this particular B2B record, and the Retailer Service Order number that initiated it unless there is a need to analyse the DataStream in detail, The fact remains that the LNSP must also be a recipient of the MDFF files as well.</p> <p>By stating that the Retailer Service Order must be provided ONLY to the Retailer, but also stating that it is “R” Required if available, it has the costly by-product of forcing the MDP to produce differently structured content for the NEM 12 files sent to the Retailer and LNSP. One for the Retailer that includes the entire 500 record, and one for the LNSP without the 500 record.</p> <p>This seems a pointless and unnecessarily costly obligation on the MDP.</p>	Accepted in concept. Procedure has been re-worded.
40.	United Energy			<p>UE suggest the text should read:</p> <p><i>This information must only be provided to the Retailer who issued the ServiceOrderRequest and the LNSP</i></p>	
41.	ActewAGL	5	Basic Meter Reading File Specification and Validation (NEM13)	Nowhere in the examples or appendix does it show where the CRLF goes for any line. Should the 100 or 900 record have a CRLF or not? Currently receive both.	Section 3.3 specifies the requirement for CRLF.
42.	AGL	5.1	Blocking cycle	The deleted diagram is clearer than the inserted diagram.	Noted
43.	Momentum	5.2	Header record (100)	Does this mean ENM is not a Registered Participant? As per the Embedded Network Rules, it’s a registered participant hence calling it out explicitly is causing a bit of confusion while reviewing.	See response to item #1.
				Momentum proposes to replace with the below:	

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				The MSATS Participant ID of the intended Registered Participant (including ENM or MC) or MDP.	
44.	ActewAGL	5.3	Basic meter data record (250)	<i>MeterSerialNumber</i> Is this statement correct by referring to IntervalDate for Accumulation meters?	AEMO agrees that the statement is not correct. Procedure updated.
45.	Momentum	APPENDIX A	Transaction Codes Flags	There should also be an example in the appendix section say H.9 and H.10 for Meter Change: Metering Installation with Accumulated Metering Data to Remotely Read Interval Metering Installation and Meter Change: Metering Installation with Manually Read Interval Metering Data to Remotely Read Interval Metering Installation.	AEMO considers that additional examples of metering data files could be considered as part of the market readiness workstream should there be a requirement.
46.	Energy Australia	General	Forward Estimate	It appears that there has been a change of Terminology in that Forward Estimate has become “Estimation”. This is problematic as the type of estimate is important (and the glossary indicates that estimation includes ‘forward estimates’)	An Estimation is defined in the Glossary as a forward estimation.
47.	Jemena	H.1	Actual Interval Data – Metering Installations with Remote Acquisition of Metering Data	The LNSP must also be a recipient of all equivalent meter data. Same response applies to H.2 to H.8.	AEMO considers that the definition of the “ToParticipant” field in the 100 record section the requirements in the Rule, the SLP MDP provide sufficient information.
48.	United Energy	General	Forward Estimate	The example only refers to files sent to the retailers. It would useful if it was made clear in all of the examples that the LNSP must also be a recipient of all equivalent meter data (but with a different To participant in the 100 record)	
49.	United Energy	H.1, H.2, H.3, H.4, H.6, H.8	Actual Interval Data – Metering Installations with Remote Acquisition of Metering Data	As per comment for H1	
50.	United Energy	H.7	Transfer occurs on the NSRD for Manually Read Interval Metering Installation	It would be useful if the example referred Accumulation as Type 6 and Interval as type 5 (or type 4A) as there appears to be confusion from a range of participants that type 4A adopts type 5 metrology and processes.	AEMO considers that additional examples of metering data files could be considered as part of the market readiness workstream should there be a requirement. Refer to AEMO’s response to this topic in the SLP MDP.
51.	United Energy	H.5	Meter Change: Metering Installation with Accumulated Metering Data to Manually Read Interval Metering Installation	It would be useful if the example referred to type 5 (or type 4A) as there appears to be confusion from a range of participants that type 4A adopts type 5 metrology and processes.	