METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *United Energy*

Completion Date: *20 July 2016*

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1. General Feedback on Draft Report and Determination

Reference	Comment
G1. Need for certainty and scope lock down	UE note that participants provided extensive responses to AEMO on the documentation changes with over 250 pages of comments across the 11 procedures being changed. This is a significant effort on both AEMO's side and on industry side to review the changes and responses and provide meaningful comment. In the establishment of the dates in the AEMC's Final Rules a key requirement of most of industry was that all the procedures were finalised by 1 Sept 2016 to allow time for build packs to be completed, industry to build systems and test and implement the changes. This period of just over one year is reflective of the recent NARG implementation and also of B2B and gas FRC etc. which have all taken over a year to implement. This implementation is more complex, there are more parties involved and the changes are being made in a high churn or dynamic environment. The roll out of new smart meters is not just market led there is a significant component of the rollout that is mandated. Over the last month, there is significant level of uncertainty and delay creeping into the timeframe; • The AEMO plan on a page now notes that Work Package 3 which was meant to be the updating of more administrative or role overview documents may include an as built version of the Retail Market Procedures or other documents. • AEMO has also noted the June 16 COAG letter and the two tranche approach to jurisdictional metrology changes with no timing or estimated timing being available on when the second tranche, the more material changes might be available. AEMO note that metrology material which governs the non-reversion from interval to a basic meter will be removed as this is now in the NER, however the reversion of smart or advanced meter to manually read interval meter is not clear anywhere or whether a jurisdictional Minister may make this clear. Similarly with the gap issues created with the x and y versus small customer definition these also remain unclear. We note that AEMO say the jurisdictions are consulting with participants, this is not the case in Victoria at this point in time. This means that the National Metrology Procedure will undergo several more rounds of consultation and will not be completed as intended by 1 Sept 2016. • At the POC w/g meeting on 7 July 16, AEMO noted that the Retail Electricity Market Procedures could change again in Work Package 2 and again in Work Package 3 which significantly adds to industry and AEMO workloads and delays the locking down of the scope of changes. • The delays in the B2B framework and forming the new IEC and B2B procedures w/g will also delay the finalisation of these procedures well beyond the original 1 September 2016 date envisaged for the material B2B efforts. UE suggests that AEMO, if they are not already, begin actively tracking and communicating any program slippages, and inform all stakeholders of both the timeframe risks and any risks that might impact achieving robust industry processes. UE commend AEMO on establishing their new industry governance group, the PCF, to address these risks and consider that the risks and

Reference	Comment
	implications of the current processes will be better escalated to jurisdictions, safety regulators and other regulators where decisions regarding processes and responsibilities made in these other forums will impact on systems and processes and these procedures under consultation. The interaction between B2M and B2B is important. The PCF will recognise the need for proper workflow to ensure that all participants have a common understanding of how the processes are intended to work. Without the industry agreed workflow and build packs for B2M and B2B processes, testing across the increased number of participants is unlikely to be provide assurance of workable end to end transactions.
G2 - VIC AMI status as type 5, MRIM,RWD should be maintained 4.4.4	As part of the mandatory rollout of smart meters in Victoria, the Victorian AMI Industry Steering Committee compromising of Victorian Government, AEMO, retailers, distributors, regulators and consumer representatives collectively agreed to type 5, MRIM, RWD flag. UE consider that this meter classification and identification of a Victorian AMI meter should continue, there is no benefit for consumers in changing the meter classification and metrology. Any change in this area will impose additional cost, risk and complexity in a programme that is already at significant risk of falling behind an achievable delivery schedule. In the metering competition Final Determination and Final Rule; • The AEMC made no clear requirement to either grandfather these meters or require them to have a change of meter type/ installation classification • There is no rule in the NER that requires an existing meter established in the market systems or participant systems to be reclassified to a new classification • The current or 1 Dec 17 version of the NER does not prevent a meter having higher capability than its NER meter type classification • AEMO has also not clarified that the VIC AMI meters need to be a type 4 or type 5, there is no alteration to these existing meters being made on 1 Dec 17 that requires a reclassification. Discussions in the AEMO POC w/g revealed no clear demand or compelling need to rename/re-categorise the Victorian AMI meters. Any change in the Install Type Code and/or the Metrology will have costs for backend bulk data conversion at AEMO, retailers and distributors systems. Where meters are installed in the NEM and later rules change, the installed metering installation is deemed to comply with the rules at the time until a new meter needs to be installed. UE believe that this same grandfathering practice should apply to Victorian AMI meters, refer to Metrology Procedure Part A, clause 4.6 response. The documentation to date provides no justification or rationale as to the need or benefit of this change to change the Meter Install Type Code of the meters to VICAMI from MRIM/RWD, we query whether this would meet the NEO given the deliberate decision by AEMC to not make the situation clear in its Final Determination and Final Rules. Given the amount of work and level of change to be delivered to ensure cost increases to customers are minimised, UE considers that effort is better spent elsewhere. The AEMC established a deeming arrangement for initial MC based on the meter types in the NER i.e. the type 5 or 6 metering categories, this deeming arrangement would be voided if the meters are moved from a type 5 metering installation type outlined in the NER schedules for

Reference	Comment
	accuracy, metrology and accreditation capability to some other classification prior to 1 Dec 2017. UE recognise that AEMO have advised that the reclassification to a new VICAMI category is a readiness activity which needs to occur across all systems on or after 1 Dec 2017. In short UE believe that there should be no "VICAMI", references in the documentation – instead there should be a grandfathering clause introduced in the National Metrology Procedure Part A that allows the existing Victorian AMI meters, that were implemented under 9.9C of the NER to continue in their current classification of MRIM/RWD, and continue using the Type 5 Metrology even after the 9.9C provisions expire on 1/12/17. If AEMO reject UE's recommendation articulated above, and choose instead to implement the VICAMI Install Type Code, then we argue AEMO cannot then avoid being explicit about the "Type" classification that must then apply to the term "VICAMI". This is because some of the customer protections afforded to customers are currently drafted to link to the meter type in the Retail Electricity Market Procedures (REMP). In that case we recommend that the VICAMI Install Type code must be explicitly defined as meeting the Type 5 definition (with a variation that it can be remotely read). This decision needs to be made with the 1 September 2016 Final Determination due to the ramifications across a range of REMP and for the tranche 2 jurisdictional metrology material.
G3 - If AEMO require the VICAMI flag to capture all meters churned to Vic AMI meters from 2009?	As noted above UE recommends that the DB Vic AMI meters be retained under the current type 5 arrangements given that there is no compelling case to change. However, if AEMO reject this view and require identification of VICAMI meters in the market, then all Vic AMI meters for consumers below 160MWhpa should be identified as such. Both distributors and retailers as a licence condition, must undertake meter exchanges with a Victorian AMI meter that meet the functionality, performance and service levels of Victorian minimum specification advanced meters. Until the Victorian Government repeal these instruments this continues as a licence obligation for Victorian retailers and distributors for meter exchanges in Vic even after 1 Dec 2017. AEMO should have a clear position on what the Vic AMI flag is trying to capture as this will impact the definitions, this should be clearly justified against the NEO. Refer to the Glossary, Chapter 3, comments below for more explanation on the two definitions. Before costs are incurred across all of industry which will be the outcome from the AEMO decision on 1 September 2016, AEMO should seek a written submission from the Vic Government on their position on the continued use of a Vic AMI meter specification, the need for reclassification of Vic AMI meters to VICAMI and the scope for reclassification.
G4 - EN transition and readiness 4.3.4	UE recognise the uncertainty created with regard to the transition of arrangements for ENs and EN customers. The AEMC rule change suggests that the AEMO guidelines will be developed to account for ENM NMI allocation however this we understand is a key deliverable in pack 2 due on 1 March 2017. The NMI allocation procedures will need to deal with the following: The NMI ranges that will and are allocated for each ENM and how the NMI range can be linked back to a jurisdiction and LNSP area: • Clarify when the new EN NMI ranges will be used i.e. for all new greenfields EN established from 1 Dec 17, all existing EN when an off market child with an LNSP NMI goes on market, when existing LNSP NMIs are used and connections become off market when an EN is

Reference	Comment
	created, children that remain on market retain the LNSP NMI • Where LNSP NMIs for off market children are going on market or newly created brown fields NMIs, the NMIs will need to be made extinct in the LNSPs systems to ensure that no more activities or data updates occur against the NMI even if the same NMI exists being managed by an ENM. LNSP systems do not cater for LNSP role churn. The transition of the LNSP out of the EN LNSP and RP,MP and MDP role can only occur after the following activities have been completed: • ENM SLP and guideline and accreditation documentation has been finalised on 1 March 2017; • The prospective ENMs have reviewed the documentation and developed their accreditation responses and can demonstrate capability say by mid-2017; • AEMO has accredited the ENM so the ENOs are able to appoint accredited parties by say end August; • The ENOs engage an ENM to commence operation from 1 Dec 17 and advise the impacted parties LNSP, FRMP current RP, MP and MDPs for all parent and children NMIs by end September; • The LNSP and child FRMPs agree the transfer of RP and MP/MDP roles and the outage timeframes and financial arrangements to changeover type 5 interval or Vic AMI meters close to 1 Dec 2017, this needs to occur by the start of November; • The FRMP coordinates the retailer planned interruption notifications to the customers and ENO/ENM by mid Nov 17 for a 1 Dec 17 meter changeover; and • The new ENM is appointed for all on market children and takes on the ENM role on 1 Dec 2017 at the same time as the LNSP makes the same NMIs extinct in its systems and the meter exchanges and other role changes occur. The FRMPs update the MC and MP/MDP roles. Whilst the above is an indicative timeline of tasks, this work needs to be completed while internal and industry testing are progressing, data conversion/change activities for the MC and meter types etc. and the necessary accreditations as MC and B2B parties are occurring. The complexity of these transition activities should not be underestimated when seeking to engage with ENO and customers for access and outages within shopping centres and retirement villages etc. The complexity of closure in some form of an LNSP NMI within the LNSP systems while leaving the same NMI operational in the market should not be underestimated. These planning activities warrant a dedicated planning activity in their own right.
G5 - Objection Logging periods 4.7.4	Despite a number of participants in workshops and in their responses supporting no change to objection logging periods, AEMO state that there is no compelling argument to hold to the current positions of 5 business days. UE are of the view that there is instead inadequate justification to support a change from the current 5 days to the 1 day proposed by AEMO. We

Reference	Comment
	note that a number of valid reasons for not changing from the 5 days period have been discussed in the recent workshops: • Small retailers may not have the system capability to automate a response and a 1 business turnaround time is not sufficient and could lead to more objections than needed, the same could apply to any number of the new metering participants, MC,MP and MDP who may not have the system capability and the resources for a 1 day review • 1 business day allows no follow up for a retailer with metering parties or with a customer where they need to establish if an objections is warranted or not • Encouraging a behaviour pattern where recipients will object as a matter of course to give themselves time, and then withdraw that objection after review. This will result in an overall a higher level of objections and a general increase in back office work for the parties involved and the businesses that deal with re-work, errors and customer complaints. • The change is not a direct outcome of the metering competition rule and should be out of scope. Before introducing such a change a study of the costs and benefits should be first undertaken by AEMO. • With very significant level of role and responsibility changes and the lateness of the finalisation of these changes, the early part of the metering competition market is not the time to make such a change, it is better to allow the time to get the transactions right the first time across all of the systems. UE suggest that this change not be undertaken at this time, but be reviewed again after several years of metering competition once all systems and processes are working properly across industry.
G6- Network tariff code 4.8.4	UE note the comments on network tariff code and a desire to make the MP obligation to update the network tariff code at meter level mandatory. One participant questioned the need for this approach. UE see no reason why the MP is required to allocate the network tariff. We acknowledge the view of some participants that the MP knows the detail of the meter installation. However we believe that the MP often will not understand the available open tariffs within each jurisdiction, and so requiring them to select and apply the tariff correctly is unlikely to be practical. The end result is that the LNSP must still check all tariffs and seek to correct the tariffs if they do not match the configuration anyway. The original and ongoing purpose of the network tariff in MSATS is for NMI discovery and retail quoting for customers. The database of record for network tariff allocation to a NMI is the LNSP as this is where the financial transactions for network billing are generated. The more important aspect is to learn from the NZ practice where the level of billing rework was too high, and which had significant cost impacts for all parties, particularly retailers. It is important that the meter register information and the NMI suffix information is mandatory to allow the network tariff codes (or retail tariff codes) to be correctly and unambiguously allocated. Industry should agree that this has been achieved so that retailers and customers can be billed accurately. If this is not unanimously agreed by all of industry then these procedures should not be finalised. The clarity of datastreams and tariff application needs to be correct, poor performance in this area will undermine pricing signals to

Reference	Comment
	customers and customer confidence in the reform.
G7 - Mandatory entry into MSATS of the NMI Suffix for each interval channel when a meter is installed	To re-iterate the discussion in the workshop. UE believe the MDM Contributory Suffix in MSATS transactions CR25xx, 300x, 305x, 308x & 309x, should be a mandatory field, because clear identification of the NMI suffix is an important factor in correctly applying the Network tariff, and it is a valuable attribute in performing automated validation and quality control on the interval data streams when new meters are commissioned.
G8 - Metrology Procedure Part A. Section 3 SLP MDP Services Section 3.3	As currently drafted the Retail Electricity Market Procedures provide no indication of remotely read interval data collection frequency for the 2 business days validation obligation to link to. Specifically: • The draft Metrology Procedure Part A draft has omitted the existing Clause 2.4.6 – "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", which is an existing requirement for collection of Type 1-4 meter data. A similar requirement is placed on Victorian AMI meters. • 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). These clauses need 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). Meter Data is a critical aspect of AEMO settlement, and retailer and network billing activities, and with no minimum data delivery obligation imposed on the MDPs then the integrity of key financial processes that rely on timely delivery of interval data are compromised. The introduction of remote acquisition meters (Type 1-4 and Vic AMI Type 5) offers great advantages in the timeliness, granularity and accuracy of meter data for market settlement and billing, and it would be a mistake if the industry did not set minimum standards to ensure the technology delivers a consistent baseline performance. The minimum data quality in the current draft of procedures is that data quality of 98% actuals is not required until 4 -6 months later, this is not an acceptable position for accurate network and retail billing in our view and we query whether this is acceptable for financial settlement in the NEM. We understand that there is a view in some quarters that bi-lateral commercial agreements can meet the objective of participants in this matter. However it is not reasonable to expect that existing best-practice Network billing processes, that rely on the daily delivery of interval data, should be allowed to degrade because some new entrants may choose not to offer a reasonable standard of data delivery services, or choose to charge premium prices for what should be a minimum service, especially since the Networks do not even have a choice in who the MDP will be, and do

Reference	Comment

	not have the option of replacing services providers who do not provide a satisfactory meter data delivery service. Failure to retain these minimum service level requirements for collection of meter data, coupled with the data delivery requirements, would represent a significant and costly step backwards by the industry.
	
	Networks are not in a position to wait for the initial data provision after a settlement week as up to 7 business days may have already elapsed before they know if data to produce accurate network bills is missing or not. Given the move to remotely read meters, retailers and customers should be able to receive accurate bills based on actual data. This is a key benefit of a change to remotely read technology, the current draft of the Metrology Procedure does not meet the NEO.
	
	The lack of clarity in the arrangements provide no indication of data collection/provision and data quality by which to measure MDP performance which surely is an integral aspect of the settlement of the NEM, not just for the other financial transaction which rely on the accurate and timely data provision. The MDP SLP is predicated on a normal expected data services with the ability to bi-laterally vary the format, method of delivery, timeframe to deliver or provide additional data services. The MDP SLP is deficient in that the minimum normal service is not clear and the proposed Procedure is not consistent with other Procedures and legislation.
	
	UE suggests the following inclusions:
	
	• 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 requirements:
	  ○ Meter data must be collected on a daily basis for all remote acquisition meters
	  ○ Of the meter data collected, no less than 95% being actual data from meters, with the remainder substituted.

G9 – Sequence of CATS transactions for a meter churn	The Rules Clause 7.6.2 and 7.8.9 and the Metrology Part A Procedures 11.1 and 11.3 imply a strict sequence of role changes and alignment of some role changes with the Meter Exchange date. UE believes that the sequence of CATS CRs needed to affect a Meter Churn in accordance with these rules is constrained by the rules, and that quite a number of CATS role change transactions, in particular some retrospective transactions cannot be used because they don't strictly conform to the rules. UE believe it would be of immense value to all participants if AEMO were to produce worked examples (including the timing and delays caused by objection periods etc.) showing the allowable sequence of CATS CRs under Meter Churn scenarios, and that this will inform the Conditions Precedent, and the description needed for the relevant CRs. Some scenarios that could usefully be explored are: - Meter Churn where the New MC is also appointing a new MDP and MP - Emergency Meter Churn where an Initial MC informs a Retailer of a failed meter which causes the customer to be off supply.

Reference	Comment
	- UE also recommend that the workflow of a logical meter exchange be agreed, i.e. where a type 4 meter may need to be reassigned to a type 4A if the next small customer refuses to have a remotely communicating meter, similarly for vice versa when a type 4A is able to have cost effective communications available or when the refusing customer moves premises. UE consider that a CR3090/3091 could be used, whilst other participants may consider a CR3080 should be used. UE re-iterate that it is important that the processes work end to end and establish manual read cycles etc. when required in a standard process.
G10 – C4 report to new MDP	General comment: It would be highly beneficial to make available the C4 report normally provided at the completion of a role change to the New MPB at the requested stage to allow give them visibility of the current configuration in MSATS. This would provide the current Network Tariff Codes (NTC) associated with the site, facilitate easier alignment of new configuration to existing and support publication of NTC by the MPB. This change would also reduce the need to query LNSP for information via email or SMP transaction moving forward.

2. Glossary and Framework

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments – United Energy		
		Metering Competition	Embedded Networks	Meter Replacement Processes
1.1	Purpose and Scope	The clause states: '*Hence, this document forms part of each of the Retail Electricity Market Procedures and may be amended in accordance with the process Applicable to the relevant Retail Electricity Market Procedure.'* UE recognise that 'rules consultation' is required for changes to a number of the 11 documents that form part of this suite of Retail Electricity Market Procedures that are currently out for consultation in pack 1. AEMO should clarify in this document that 'Rules consultation' applies to all documents included in this suite of documents including the MDFF Specification, National Metering Identifier Procedure and the Glossary if there is ever a need to change these without also changing a		

Clause	Heading	Participant Comments – United Energy		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		document that requires 'Rules consultation'. AEMO should confirm if the new term Retail Electricity Market Procedures is being used to define the list of Procedures in this document under NER 7.16.1 (f) and hence with the exception of the B2B procedures the list of documents including the metering services procedures i.e. accreditation checklists and registration/de-registration documents etc. are also included as procedures as defined in 7.16.1 (b) i.e. they are the procedures authorised by AEMO under Chapter 7 and must be established and maintained by AEMO in accordance with the Rules consultation procedures. If this is correct then the ENM SLP and the ENM guideline should also be included clearly in the defined term and the		

Clause	Heading	Participant Comments – United Energy		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		picture in section 2.2.		
1.2.2	Interpretation	UE suggest that this clause also clarify the NEL interpretation that headings have no meaning within any of the Retail Electricity Market Procedures (REMP) documents. AEMO agreed with the point at the 7 July working group meeting, however it is not reflected properly across the REMP suite of documents. When the various jurisdictional metrology procedures were collated into a single document, attention was paid to headings and lead in sentences for clauses to clarify the obligation and link it to meter types. If this is not clear at each clause level it changes the obligations significantly, despite the intent of the heading. The text or paragraph approach rather than clause and sub clause approach does not aid transparency. AEMO will need		

Clause	Heading	Participant Comments – United Energy		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		to review all of the documentation before 1 September to ensure the accuracy.		
Chapter 3	Glossary – Vic AMI	United Energy have explained in item G2 in our General feedback at the beginning of this response that we believe the specific VICAMI references should not be retained. We note however that the VICAMI meter term in the glossary is defined as any meter installed in Victoria as part of the Advanced Metering Infrastructure mandate by the Victorian Jurisdiction, this includes AMI meters installed by retailers as well as DBs. AEMO have an alternate definition of VICAMI in the CATS procedures which appears intended to highlight the Vic DB provided VIC AMI meters.		

Clause	Heading	Participant Comments – United Energy		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		The CATS definition should not rely on NER 9.9C which has been deleted on the same day the new CATS procedures commence. If AEMO wish to highlight Vic AMI meters then there needs to be a definition of relevant metering installation included in the glossary. UE suggest the NER 9.9C definition be used if this is the case: *relevant metering installation means a metering installation for a connection point located in Victoria in respect of which the volume consumption of the customer is less that 160 MWh per annum of energy excluding any such metering installation that:* *(a) was installed prior to 1 July 2009 and in respect of which, as at that date, a retailer was the responsible person; or* *(b) was installed on or after 1*		

Clause	Heading	Participant Comments – United Energy		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		July 2009, by a retailer as part of that retailer's ordinary replacement cycle of those metering installations and in respect of which the retailer was, as at 1 July 2009, the responsible person; *(c) is a type 1 metering installation;* *(d) is a type 2 metering installation; or* *(e) is located at a high voltage connection point.* If AEMO chooses to adopt the approach that all Vic AMI meters that meet the required Vic AMI functional and service level are identifiable in the market, then the current version of the glossary term is suitable and the CATS procedure should be amended to adopt the glossary term.		
Chapter 3	Glossary – Estimated	The terms “Estimated Reading” and “Estimation” are		

Clause	Heading	Participant Comments – United Energy		
		Metering Competition	Embedded Networks	Meter Replacement Processes
	Reading and Estimation	poorly differentiated, and will create confusion with the reader who will not understand whether an Estimated Reading is a substitution or a forward estimation The word 'Estimation', should only use used in the context of a Forward Estimation. The Term "Estimated Reading" should be removed and replaced with the term "Substitution", and its definition should be changed to "A calculated or agreed replacement meter reading where an actual meter Reading is not available"		

3. Meter Data File Format

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
3.3	File construction	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		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		technology since 2012. 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. 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		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		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. 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		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		framework and should be advised of meter tampering in a consistent manner. 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. This clause is another example where the heading has no meaning and each of the sub		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		clauses need to be linked to an obligation relating to meter type.		
4.2	Header record (100)	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.		
4.3	NMI data details record (200)	UE welcomes the inclusion of Register ID as a mandatory field within Type 4 NEM12 file format.		
4.6	B2B details record (500)	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. Whist 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		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		DataStream in detail, The fact remains that the LNSP must also be a recipient of the MDFF files as well. 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. This seems a pointless and unnecessarily costly obligation on the MDP. UE suggest the text should read. *This information must only be provided to the Retailer who issued the ServiceOrderRequest and the LNSP*		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
H.1	Actual Interval Data – Metering Installations with Remote Acquisition of Metering Data	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)		
H.2	Substituted Interval Data – Metering Installations with Remote Acquisition of Metering Data	As per comment for H1		
H.3	Interval Metering Data – Manually Read Interval Metering Installation Estimate	As per comment for H1		
H.4	Multiple NMIs and Datastreams, Metering Installations with Remote Acquisition of Metering Data – (all actual metering data)	As per comment for H1		
H.5	Interval Metering Data – Remote Read Metering Installations with Remote	As per comment for H1		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
	Acquisition of Metering Data - Multiple Quality Method/Reason Code combination			
H.6	Metering Data for Meter Change with Configuration Change – Manually Read Interval Metering Installation	As per comment for H1		
H.7	Transfer occurs on the NSRD for 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. As per comment for H1		
H.8	Meter Change: Metering Installation with Accumulated Metering Data to 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.		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		As per comment for H1		

4. Metrology Procedure: Part A

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
4.3	Password Allocation	UE observes that modern metering uses sophisticated one-time passwords managed via a password management application and UE continues to believe that sharing / dispensing of passwords as implied in this clause is based on an outdated paradigm and will prove to be an increasingly impractical obligation and one that is not consistent with best practice security management. Additionally the stated requirement to supply the FRMP and LNSP is not consistent with Rules 7.15.4 (e) (2), which only requires sharing password with MC, MDP and AEMO. UE recommends aligning the procedure with the rules to reduce the possibility of		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		passwords being stolen and misused.		
4.6	Grandfathering	UE previously suggested that there be a change to this clause that allows for grandfathering of the Victorian AMI metering. We have discussed our view regarding VICAMI at length in our general introduction (G2), and again we recommend that this clause be amended to ensure proper grandfathering of the Victorian AMI meter fleet. This is no different to the treatment of meters or transformers that were installed under a previous standard which are grandfathered.		
4.10	Alarm Meters	The descriptions of the alarms in this section is not consistent with the description of the Alarms in Met B – Section 7.2, and not consistent with the available Alarm Reason Codes in Appendix E of the MDFF specification, which provides		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		the guidance on recording the alarms in the interval data. For example in Appendix E of the MDFF • Voltage Failure – is not an available Alarm/Reason code • Interval data overflow is not an available alarm code – UE suggest there be an alignment of alarm descriptions in the three documents (Met A, Met B, MDFF) for clarity.		
10	INSTALLATION OF METER(S)	UE believes this clause does not adequately acknowledge the necessary involvement of the LNSP in some installations. There should be some enhancement to allow for a level of operational flexibility in the field when the meter installation also requires		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		the installation / upgrade of a service that must be undertaken by the LNSP. In particular flexibility to access meter terminals and remove and replace meter terminal seals may be applicable in some circumstances in order to ensure the ability to test and ensure safe energisation of a site. We note that draft clause 12.1.3 (c)) allows an MC to remove the seals of an LNSP's network device where needed. We believe a similar flexibility should be afforded to an LNSP to access and remove meter terminal seals if needed for safe energisation. UE suggest insertion of a paragraph along these lines: *Where an LNSP is required to install or upgrade a service, and the metering installation has already been installed for that site, the LNSP may*		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		remove seals and access the Meter terminals to effect testing and safe energisation of the site, and provide details of the replacement seals to the MC.		
13.2	Metering Data Collection	The last para states: 'For metering installations that do not have remote acquisition, and where the MC is not a TNSP, the MC must ensure use reasonable endeavours to ensure that each metering installation is read every three months, and the Meter Reading frequency is agreed with the FRMP and the LNSP.' The corresponding clause in the MDP SLP is at least once every three months. The drafting in this clause should reflect at least every three months which accounts for customers who may remain on monthly read cycles.		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		UE suggest that AEMO revert to the original wording in the Metrology Procedure that the MC, FRMP and LNSP must agree the read frequency for all manually read meters which must be at least every three months. UE do not see why customers who enjoy daily data collection and access to their data should need to revert to data availability every three months. The drafting is inconsistent with Victorian legislation where customers are able to request and retailers and distributors must provide customers with interval meters their data up to the date of the request and not data that is some three months old. Using the term 'at least every three months' is consistent with the MDP SLP, clause 3.4 (c).		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
13.5	Verification of Metering Data for Type 4A, 5, 6 and 7 Metering Installations	The heading in this section of the NMP suggests that this clause only relates to small customer metering and to type 4A, 5, 6 and 7. As noted in the Glossary, section 1.2.2, headings have no meaning, the heading is misleading. The obligations in the first few paragraphs appear consistent with the intent of the MP SLP i.e. to cover all meters but are not reflective of the intent of the heading. AEMO should make sure that each drafted paragraph clearly links to a meter type obligation, this would be easier adopting a style in the NMP like adopted in the MP SLP with lead in sentences and sub clauses.		

5. Metrology Procedure: Part B

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
1.3.	Related Documents	Can this list of reference material be extended to include all pertinent documents please?		
2.4.	Metering data quality flags	Suggest revert to the current Metrology definition of A for actual data that is validated. The amended definition of A is unclear.		
3.1.	Application of section 3	**Feedback A**: The statement "aligning with adjoining intervals" implies an onerous profile smoothing activity for substitution. This is not appropriate or cost effective for Mass market meters. This should be a requirement only for LARGE installations. **Feedback B**: As we have articulated in our general introductory comments (G2) United Energy strongly recommends eliminating the		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		VICAMI distinction completely, and instead create a grandfathering clause that maintains the Victorian AMI meters as MRIM/RWD with Type 5 metrology in perpetuity. However, If AEMO do not accept this view then UE recommend adding a third paragraph in this section to clarify the allowable VICAMI substitution methods and base it on the second paragraph of text inserted in the latest Draft. The paragraph to be inserted could read: "*For VICAMI metering installations installed in accordance with NER section 9.9C the MDP may perform Substitutions in accordance with Section 4*" Introducing this extra paragraph will comprehensively address the intent of supporting compatibility of the procedures with the metrology of the existing VICAMI installations, and is a better place to call out the VICAMI exceptions than where it resides in the text at		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		present which is at the end of Section 3.3 after the Type 20 – Churn Correction heading, and which does not allow for the full set of Substitution procedures that VICAMI meters currently align to.		
3.3.	Substitution Types	United Energy is of the view that the text under the heading VICAMI Meters at the very end of section 3.3 means that the existing fleet of VICAMI meters will not comply with these procedures without costly industry wide change, because the text does not additionally offer the use of Substitution Types 53, 54, 55, 56, 57 and 58, which are presently in use for VICAMI meters. UE recommends re-writing the text and moving its location to Section 3.1 as described in our response to Section 3.1.		
7.2.	Validation of interval metering data alarms	The description of the metering alarms in this section is not consistent with the description of the metering alarms in the newly inserted section 4.10 in		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		Metrology Part A. Additionally the Alarm description could be aligned with the Alarm reason codes description available in the MDFF Appendix E. Some examples: • Time tolerance is not an available reason code in Appendix E of the MDFF specification • Cycling redundancy check Error is marked as an obsolete code in Appendix F in the MDFF specification.		
9	VALIDATION AS PART THE REGISTRATION PROCESS	Tracked changes draft, clause 9.1 validation of NMIs general. UE suggest that the validation that a NMI is within the range allocated to the LNSP is confusing. ENM's are LNSPs on an EN but they may not be allocated a relevant NMI range that provide an indication of NEM state and local network areas etc. The drafting		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		suggests a level of simplicity that may not be available if LNSP NMIs continue with an ENM in a brownfield network or cross border NMI issues etc.		
9.2.	Validation for manually read interval metering installations	In the tracked changes draft, clause 9.3 refers to validation of interval meter data, not 9.2. Clause 9.2 in the tracked changes draft refers to remotely read meters. In clause 9.3 there is a requirement that before distribution of data, the metering data must be of the expected magnitude and profile shape for manually read interval meter customers. This is not even a requirement of remotely read customers and is not efficient and should be removed. The second clause (b) should be removed in 9.3. UE query where this is not required for remotely read (large and small) customers why the first b) is reasonable		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		for manually read CT customers. The metrology and validations should be commensurate with the level of energy and risk now that remotely read meters will be the norm for all customers. The drafting in 9.2 and 9.3 need to have each paragraph referencing the meters that it intends to apply to, as noted earlier headings have no meaning.		

6. MSATS Procedures: CATS Procedure Principles and Obligations

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
2.2	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	(2.2) (o) UE note that currently for a New Connection it is the FRMP that determines the Initial ADL value, and passes it to the LNSP (and MDP) as part of the New connection service order. UE recommends adding additional text to clause (o) that makes it clear that for a New Connection the FRMP is responsible for determining and supplying the initial ADL value to the MDP.		
2.3	LOCAL NETWORK SERVICE PROVIDER	Under 2.3 (e) - UE doesn't see any logic behind the requirement the LNSP must supply the MP with the ADL at the time of NMI creation Currently, for a New Connection, the initial ADL value originates with the Retailer (Not the LNSP), and is		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		passed as a mandatory field to the LNSP in the New Connection Service Order. It is the retailer that has the necessary customer information to generate the initial ADL value not the LNSP. UE Suggest the 'at the time of creation of a NMI' is removed from this statement and the current wording is retained as part of the CR400x, CR250x transactions, which is adequate: • CR400x - (d) Obtain the ADL from the LNSP if this value is not otherwise provided by the New FRMP. CR250x – (e) Provide the ADL if this value is not otherwise provided by the New FRMP.		
4.2	CHANGE REASON CODE	**Point A – Role Change** UE has concerns that the Initiating Participants may not be correct for some of the		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		transactions listed in Table 4.1 The initiating participant for CR6xxx Role Change transactions appear to be inconsistent, as noted below. Notwithstanding a lack of clarity over the proposed process and sequence of Change Requests for managing meter churn, it appears as though the initiation participants for some transactions may not be consistent with the rules as noted below. • CR62xx (Change MDP) can be initiated by both the FRMP and MC. This is not consistent with the rules – which allow only the MC to appoint the MDP. • CR63xx (Change MC) is initiated by the MC only. However the rules state that the FRMP appoints the Metering Coordinator. Why is the FRMP not the Initiating participant here??		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		• 68XX – This transaction which allows the change of multiple roles can be initiated by either the FRMP or the MC – and so is inherently not strictly aligned with the rules. There may very well be advantages in allowing these transactions to be more flexible than the strict interpretation of the rules allow – UE recommend that AEMO clarify the use of these transactions where they are not consistent with the rules.		
4.11	STATUS CODES (NMI AND DATASTREAM)	4.11.3 (c)) Please refer to MSATS CATS Procedure Feedback for Section 4.12 Below with regards to the proposed VICAMI code definition in this procedure.		
4.12	METERING INSTALLATION TYPE CODES	UE has articulated its overall view regarding the VICAMI install type code in our introduction general comment (G2). The Victorian AMI Industry		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		Steering Committee compromising of Victorian Government, AEMO, retailers, distributors, regulators and consumer representatives collectively agreed to type 5, MRIM, RWD flag. UE consider that this meter classification and identification of a Vic AMI meter should continue, there is no benefit for consumers in changing the meter classification and metrology. Any change in this area will impose additional cost, risk and complexity in a programme that is already running well behind in terms if an achievable delivery schedule. In short UE believe that there should be no “VICAMI”, references in the documentation.		
4.13	READ TYPE CODE	There appears to be inconsistency in the use of Customer, Consumer and End User throughout this procedure e.g. Table 4-13 refers to Consumer Read and End User		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		Read, Table 4-14 replaces End User read with Consumer Read (Assume this is a defined field value which is why it states 'Consumer'?). Some inconsistency also appears throughout the document. Suggest a find/replace on Customer and alignment of terms across document. If these terms are intended to have different meanings it would be useful to define them in the Glossary.		
	AEMO BULK CHANGE TOOL	The Template heading numbering departs from the document at this point – we will leave it to AEMO to correlate the responses to the correct heading number		
8.1, 7.1 in tracked changes draft	Application [1000 1010 1020 1030 1040]	[7.1] Can AEMO please clarify whether the new FRMP is permitted to nominate the new MC (RP Role) or any other proposed roles (New MPB, MPC & MDP) in prospective		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		CR1xxx transactions in the procedure, as this is currently unclear. For retrospective CRs it is not reasonable for the new FRMP to nominate a new MC, MPB, MPC and MDP as these role changes will not align with the actual change date of a meter, which is a requirement under metrology part A 11.3, and the Rules 7.8.9 (i.e. a prospective FRMP cannot replace a meter until after the market load has been transferred, and the MP and MDP roles changes must align with the meter exchange date). It would be beneficial for AEMO to clarify the possible variations in how a meter churn can be completed, and the relevant CATS transactions as per the old Meter Churn Procedure, as it is unclear from the CATS Procedure which scenarios are permitted and consistent with		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		the Rules and Metrology Part A.		
8.4, 7.4 in tracked changes draft	FRMP Requirements	[7.4] Suggest that 'New RP' is renamed to MC as sometimes the MC will not be changing with a Retailer transfer		
8.5, 7.5 in tracked changes draft,	MDP Requirements	[7.5] (h) (iv) This statement is confusing. Is it intended to say "If the Read Type Code does not require manual meter reading"?		
8.7, 7.7 in tracked changes draft	Timeframe Rules	[7.7] As we have noted in our general comments (G5) at the beginning of this response, UE agrees with other participants that reducing this to 1 business day is not the best approach and should be left at 5 days or 3 days as a minimum. AEMO is making its assessment on the basis that in current settled market conditions >95% of transfers are completed within 1 business day. Given the increase in the number of players and complexity in the		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		market following 1 December, the rate of erroneous transfers is likely to increase. This change should be as a minimum be deferred until the new market has settled, then make the change as this is more a process improvement for retailer transfers, not metering competition…		
9.4, 8.4 in tracked changes draft	FRMP Requirements	[8.4] Suggest that the population of 'New MDP' is removed from (d) and included under the 'may' (f) point as the MDP may not be changing Extra clarification would help to make this clearer stating that the change date (prospective or retrospective) needs to align with either the date the metering installation was physically corrected (if required), the date the errored transfer occurred (if there was no meter change), or a prospective date in the future		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
9.6, 8.6 in tracked changes draft	Timeframe Rules	[8.6] UE agrees with other participants that reducing this to 1 business day is not the best approach and should be left at 5 days or 3 days as a minimum. AEMO is making its assessment on the basis that in current settled market conditions >95% of transfers are completed within 1 business day. Given the increase in the number of players and complexity in the market following 1 December, the rate of erroneous transfers is likely to increase. This change should be as a minimum be deferred until the new market has settled, then make the change as this is more a process improvement for retailer transfers, not metering competition…		
11. , 10 in	PROVIDE DATA – PROVIDE	[10] As we have noted in our		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
tracked changes draft	ACTUAL CHANGE DATE – SMALL OR LARGE	general comments (G9) Clarification would be helpful within this procedure, and the meter churn sections of Metrology Part A & SLP MP Services procedures to clearly articulate the possible sequencing variations of a meter churn, and their relationship to the MSATS CRs which are used to enact the change in MSATS. We believe the following should be considered as applicable uses for the CR1500 to support the churn process: • CR1xxx Retailer transactions – as per current descriptions. • CR6xxx Prospective Role Changes – to support the completion of meter churn on the actual change date. • CR308x / CR309x Advanced Change of		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		Metering Installation (which includes the Role Churn) - to support the completion of role changes and meter exchange on the same date.		
11.1, 10.1 in tracked changes draft	APPLICATION [1500]	[10.1] Our understanding of the CR1500 is that it is to be used to provide the actual role change date of the FRMP for retailer transfers as it states but also significantly the MP and MDP role change date in the case of meter churn, so that the Metrology Part A 11.3(c) is met. However the text does not make it clear that it is to be used for this purpose. Additional explanation is required to describe the scenarios this transaction is applicable to (e.g. meter churn as well as retailer transfer).		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
11.2, 10.2 in tracked changes draft	CONDITIONS PRECEDENT	[10.2] We note that The Conditions Precedent (do not reflect the use of this transaction as a Meter Churn role change. Since it is the MC that will have Initiated the related change request not the FRMP (b) Should be expanded to include FRMP and MC (as the CR6800 can be initiated by the MC).		
11.3, 10.3 in tracked changes draft	INITIATION ROLES	[10.3] We note that the Initiating role is the MDP whereas the MP is the meter installer, and query whether the MP should be the initiating role for a meter churn transaction		
11.4, 10.4 in tracked changes draft	MDP Requirements	[10.4] MDP needs to be supplied the Change Request ID for Role Change & Advanced Change of Metering Installation CR types as well to facilitate process.		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
12.5, 11.5 in tracked changes draft	MPB Requirements11.5	[11.5] The 2000 CR should allow for the possibility that the MPB is not aware of the metering installation type at the time of NMI creation as may occur in the case of a Greenfield NMI. Suggest this is updated so the MPB can initiate this once the new connection / meter installation is completed. E.g. 'MPB must initiate a CR300x to MSATS within 2 business days after both the receipt of the CR200x COM and completion of the metering installation'.		
13.5, 12.5 in tracked changes draft	MPB OBLIGATIONS	[12.5] See comments in relation to 11.5 above		
14.4, 13.4 in tracked changes draft	LNSP Requirements	[13.4)] As discussed in our General comments (G7) in the beginning of this response, the draft CATS procedures do not enforce mandatory population of MDM Contributory Suffix in		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		MSATS. We recommend that AEMO consider moving the MDM Contributory Suffix from the "may be suppled" to the "must be supplied" category for this CATS CR. This will have the effect of making the value mandatory in MSATS when establishing metering Installations. We recommend also providing additional clarity regarding its use by stating that it is to be populated for each register of the meter installation thus ensuring full identification of each registers behaviour and purpose in the metering installation. Additional clarity would be aided by including a definition of MDM Contributory Suffix in the Glossary that refers readers to Sections 6 and 7 of the NMI Procedure regarding its use, perhaps with examples of the types of values that are expected. E.g. E1, B1, Q1, K1 We argue that there will be will		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		be two key benefits from this change: (1) Recipients of Meter Data Notifications (MDN) will be able to check the NMI Suffix of incoming interval data streams against each MDM Contributory Suffix in MSATS for a metering installation, thus helping to identify discrepancies between registers and datastreams and instigate corrective actions. (2) Networks will be able to use the MSATS metering installation configuration data to identify network tariff incompatibilities after a meter exchange has occurred. This will help reduce the frequency of costly and disruptive cancel-re-bills for both networks and retailers when a tariff mismatch is eventually detected and the correct tariff reapplied.		
15.1, 14.4 in tracked	Application [2520 2521]	(14.4) As per 13.4 above.		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
changes draft				
16.4, 15.4 in tracked changes draft	MPB Requirements	**Feedback Point A:** (15.4) We recommend that AEMO consider moving the MDM Contributory Suffix from the "may be suppled" to the "must be supplied" category for this CATS CR. This will have the effect of making the value mandatory in MSATS when establishing metering Installations. We recommend also providing additional clarity regarding its use by stating that it is to be populated for each register of the meter installation thus ensuring full identification of each registers behaviour and purpose in the metering installation. Additional clarity would be aided by including a definition of MDM Contributory Suffix in the Glossary that refers readers to Sections 6 and 7 of the NMI Procedure regarding its use, perhaps with examples of the types of values that are		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		expected. e.g. E1, B1, Q1, K1 We argue that there will be will be two key benefits from this change: (1) Recipients of Meter Data Notifications (MDN) will be able to check the NMI Suffix of incoming interval data streams against each MDM Contributory Suffix in MSATS for a metering installation, thus helping to identify discrepancies between registers and datastreams and instigate corrective actions. (2) Networks will be able to use the MSATS metering installation configuration data to identify network tariff incompatibilities after a meter exchange has occurred. This will help reduce the frequency of costly and disruptive cancel-re-bills for both networks and retailers when a tariff mismatch is eventually detected and the correct tariff reapplied. **Feedback Point B:**		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		(15.4) As per UE's general comments (G6) in the introduction to this response, UE see no reason why the MP is allocating the network tariff, the MP may also not understand the available open tariffs within each jurisdiction which will create work for the LNSP to maintain the tariff codes in MSATS. The original and ongoing purpose of the network tariff in MSATS is for NMI discovery and retail quoting for customers. The database of record for network tariff allocation to a NMI is the LNSP as this is where the financial transactions for network billing are generated. The more important aspect is to learn from the NZ practice where the level of billing rework was too high, this will impact costs for all parties, particularly retailers. It is important that the meter register information and the		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		NMI suffix information is mandatory to allow the network tariff codes (or retail tariff codes) to be correctly and unambiguously allocated to each datastream. Industry should agree that this has been achieved some that retailers and customers can be billed accurately. If this is not unanimously agreed by all of industry then these procedures should not be finalised. The clarity of datastreams and tariff application needs to be correct.		
17.4, 16.4 in tracked changes draft	MPB Obligations	**Feedback Point A:** (16.4) As per UE's general comment (G7) and as per the response to 15.4 above. **Feedback Point B:** (16.4) As per UE's general comment (G6) and as per the response to 15.4 above.		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
18.4, 17.4 in tracked changes draft	MPB Requirements	**Feedback Point A:** (17.4) As per UE's general comment (G7) and as per the response to 15.4 above. **Feedback Point B:** (17.4) As per UE's general comment (G6) and as per the response to 15.4 above.		
19, 18 in tracked changes draft	MAINTAIN METERING - ADVANCED CHANGE METERING INSTALLATION DETAILS - SMALL OR LARGE	**Feedback Point A:** (18) Can AEMO please clarify whether these [3080 and 3081] transactions can be utilised by an MC to enact a role & meter churn, as described in the SLP MP Services Procedure Section 4.4. UE believes that these transactions could be used as an alternative to the CR680x /		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		CR300x transactions where the metering details are known. UE also believes that the retrospective change transactions will be required when dealing with failed meter scenarios to facilitate the restoration of supply to a customer i.e. LNSP and Initial MC contacts FRMP, FRMP nominates their MC who will complete the meter exchange works as soon as practicable and then complete the relevant MSATS transactions after the customer has had supply restored. Per our general comments (G9) It would be beneficial for AEMO to clarify the possible variations in how a meter churn can be completed as per the old Meter Churn Procedure, as it is unclear from the CATS Procedure which scenarios are permitted.		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		Feedback Point B: UE believes that the use of the CR1500 transaction should be permitted to confirm the Actual Change date for a Prospective CR308x / CR309x.		
19.4, 18.4 in tracked changes draft	MC Requirements	**Feedback Point A:** (18.4) As per UE's general comment (G7) and as per the response to 15.4 above. **Feedback Point B:** (18.4) As per UE's general comment (G6) and as per the response to 15.4 above.		
20, 19 in tracked changes draft	MAINTAIN METERI–G - ADVANCED EXCHANGE OF METERI–G - SMALL OR LARGE	**Feedback Point A:** (19) Can AEMO please clarify whether these transactions can be utilised by an MC to enact a role & meter churn, as described in the SLP MP Services Procedure Section		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		4.4. UE believes that these transactions could be used as an alternative to the CR680x / CR300x transactions where the metering details are known. UE also believes that the retrospective change transactions will be required when dealing with failed meter scenarios to facilitate the restoration of supply to a customer i.e. LNSP and Initial MC contacts FRMP, FRMP nominates their MC who will complete the meter exchange works as soon as practicable and then complete the relevant MSATS transactions after the customer has had supply restored. It would be beneficial for AEMO to clarify the possible variations in how a meter churn can be completed as per the old Meter Churn		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		Procedure, as it is unclear from the CATS Procedure which scenarios are permitted. **Feedback Point B:** UE believes that the use of the CR1500 transaction should be permitted to confirm the Actual Change date for a Prospective CR308x / CR309x.		
20.4, 19.4 in tracked changes draft	MC Requirements	(19.4) As per UE's general comment (G7) and as per the response to 15.4 above.		
23.4, 22.4 in tracked changes draft	MDP Requirements	(22.4) As per UE's general comment (G7) and as per the response to 15.4 above.		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
24.4, 23.4 in tracked changes draft	MDP Requirements	(23.4) As per UE's general comment (G7) and as per the response to 15.4 above.		
25.7, 24.7 in tracked changes draft	CHANGE REQUEST STATUS NOTIFICATION RULES	Add LNSP as a recipient of the 507x CR transactions for COMPLETED status into Table 24-2 MSATS is the source of truth for the NSRD for Type 4a, therefore it is critical that this is provided to the LNSP as it is required to determine when meter data is missing and enable billing. UE acknowledges that the MDFF Specification includes NSRD on the NEM12, but it clearly states that 'for any discrepancies in the NSRD, refer to MSATS as the source of truth for NSRD'. The LNSP cannot rely on the data within the NEM12 file, as		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		it may not be received in a timely manner AND is not the source of truth for market standing data.		
33.1, 32.1 in tracked changes draft	APPLICATION [6200 6210]	**Point A – Role Change Initiation Rules:** (32.1) The initiating roles for CR6xxx Role Change transactions appear to be inconsistent with some of the rules as procedures as we have previously noted against section 4.2. **Point B – CR1500 Initiation Rules:** Can you please specify for which transactions the CR1500 is expected to be used to provide the Actual Change Date? The current wording of the CR1500 is inconsistent, as it refers only to provision of an actual change date for a transfer (CR1xxx transactions).		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		If the intention is for this to be utilised to confirm the actual meter churn date, a clearer explanation of this intent, and the transactions it will be used for (e.g. CR1xxx, CR6xxx, CR309x) is required.		
34.1, 33.1 in tracked changes draft	APPLICATION [6300 6301]	(33.1) The initiating roles for some CR6xxx Role Change transactions appear to be inconsistent with some of the rules as procedures as we have previously noted against section 4.2.		
35.1, 34.1 in tracked changes draft	APPLICATION [6300 6301]	(34.1) The initiating roles for some CR6xxx Role Change transactions appear to be inconsistent with some of the rules as procedures as we have previously noted against section 4.2.		
38.1, 37.1 in tracked changes	APPLICATION [6700 6701]	(37.1) The initiating roles for some CR6xxx Role Change transactions appear to be		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
draft		inconsistent with some of the rules as procedures as we have previously noted against section 4.2.		
39.1, 38.1 in tracked changes draft	APPLICATION [6800 6801]	(38.1) The initiating roles for some CR6xxx Role Change transactions appear to be inconsistent with some of the rules as procedures as we have previously noted against section 4.2.		
39.6, 38.6 in tracked changes draft	MDP OBLIGATIONS	(38.6) Can you please clearly articulate that the MDP should be using the CR1500 to meet requirement (a) to provide linkage back to the CR1500 definition. As mentioned earlier, the definition of the CR1500 is unclear as to which scenarios require it to be sent.		
44.3, 43.3 in tracked changes draft	Request a NMI Discovery Search	(43.3) Under NMI Discovery Search 2 - can AEMO please establish the ability for the FRMP-appointed MC/MPB for a site to perform this search to identify the Network Tariff Code for the site.		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		This information is critical for the MPB to understand the current Network Tariff for a site when planning a meter installation so that they do not unnecessarily install and configure a meter which is not compatible with the Network Tariff. Ability for the MC/MPB to view this information prior to initiation of a meter installation will prevent downstream tariff incompatibility and network billing issues. There doesn't appear to be any information in this list which would be deemed sensitive or anti-competitive such that the MC/MP for a site should be prevented from viewing it if they have been nominated by the FRMP …		

7. MSATS Procedures: MDM Procedures

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
9.2	Report Outlines	In MDM reports which currently include Suffix as a report output field, include RegisterID as a new field to align with it now being Mandatory in the MDFF Specification. This will be required to complement the NMISuffix (which is currently on the reports) for use by the recipients of meter data, enabling better reconciliation of meter data discrepancies.		

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

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
9.4.	MPB Requirements	UE supports Ausnets comments – MPB's cannot be expected to be aware of all of the different network tariffs and their structures and therefore it should not be a mandatory field that they populate. LNSPs are in a much better position to be able to provide this information.		
10.4.	MPB Requirements	UE supports Ausnets comments – MPB's cannot be expected to be aware of all of the different network tariffs and their structures and therefore it should not be a mandatory field that they populate. LNSPs are in a much better position to be able to provide this information.		
11.4.	MPB Requirements	UE supports Ausnets comments – MPB's cannot be expected to be aware of all of the different network tariffs and		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		their structures and therefore it should not be a mandatory field that they populate. LNSPs are in a much better position to be able to provide this information.		

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

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
1	INTRODUCTION	UE note Origin's comments relating to changes to ROLR – Part B and AEMO's response. The ROLR –Part B should be updated by AEMO and presented to the first IEC meeting in September 2016 so the set of NEM RoLR processes can be finalised in 2016.		
2	Summary of ROLR Processes	UE supports AGL's comments that the MC/MP and MDP should be included in parties that need to manage service orders. There could be an inflight service order request to undertake a supply upgrade and meter upgrade or to change meter configuration to gross or net metering etc. These inflight service orders, including the de-energisation or re-energisation of		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		customers which may occur remotely and be acted on by the MDP need to be included. A new subclause for MC/MP and MDP should be added. This is consistent with the B2B Final rule where the existing B2B Procedures MUST be updated to cater for the metering competition and embedded network rules. UE also assumes that each registered MC will have a key ROLR contact on the ROCL and will be notified in accordance with 2 (a).		
5.1	AEMO Obligations		UE agrees with Ausnets Services that the ENM should be listed. AEMO note that the LNSP is not listed, however the LNSP may be RP/MC and is involved in a ROLR event in relation to service orders, accuracy of billing and transfer reads/metering data. AEMO	

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
			practice is to advise the LNSP and this is consistent with the regulatory framework. Both LNSP and ENM should be listed. An ENM (or ENO) may need to create transfer reads for off market children to accommodate a change of parent retailer.	
11.2	AEMO Obligations	UE support in principle the Ausgrid comment that if the failed retailer is also the MC then the ROLR retailer must either appoint an MC effective from the transfer date or be allocated into the MC role. UE presumes there needs to be a solvent company in the MC role at all times to ensure the metering installation and services are compliant. UE do not agree with the AEMO comment that the RP/MC no longer needs to be changed in a failed retailer scenario. It would be better to		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		deal with these issues rather than have a further ROLR review and set of changes later this year when work focus is on Pack 2 and B2B. If AEMO were referring to the ROLR review in clause 19.1, this should not be used to amend the ROLR processes to deal with Metering Competition.		
18.1	Conditions Precedent	Amend 16.2 (f) to 16.1 (f)		
18.2	ROLR Event Affected MSATS Participants Obligations	18.2 (a) refers to table 18-A, correct reference is Table 18-1.		

10. NMI Standing Data Schedule

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
2	NMI STANDING DATA SCHEDULE	UE support the amendments to include LNSP and TNI Code. In round 1 consultation UE also raised that the NERR customer classifications of small/large customer are also useful for customer quoting purposes and should be considered for inclusion in the NMI Stranding data schedule. These are fundamental for contract type and small customer protection frameworks. AEMO should update the NMI Standing data schedule to include these elements.		
3.1	Obligations to supply data for the NMI Standing Data Schedule		AEMO agree that an ENM is not a Registered Participant as defined in NER Ch10 and hence have no obligation to provide the NMI standing	

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
			data in this clause. Where an ENM is acting like an LNSP for on market children within an embedded network, we understand that the ENM will be responsible for creating the NMI and standing data in CATS and maintaining that data. AEMO should include the ENM in the obligation to supply the NMI standing data consistent with the intent of the ENM rule. Alternatively AEMO should footnote the Registered Participant term used in this clause and acknowledge that it includes accredited and AEMO registered parties such as an ENM also.	
3.2	Obligations when using the NMI Standing Data Schedule	AEMO acknowledge that “others” may access NMI standing data and that the access may be included in the CATS procedures. UE note that “others” is a vague term and may not be consistent with		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		the data access provisions in the NER. The use of the data by others is not limited and probably should be in a manner consistent with the prospective retailer obligations of access.		

11. Service Level Procedures for MDP

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
2.1	Metering data services	2.1 (f) needs to be expanded to cover ENMs.		
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 MDP Service Levels 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).		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		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 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		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		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. The proposed procedures are impractical if the normal data collection, data delivery and quality etc. are not clear. 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….”.		
3.4	Specific collection process requirements for metering installations type 4A, 5 and 6	In NEM procedures headings have no meaning. The paragraph in this section needs to be prefaced with “For each manually read metering installation ….”		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
3.6	Specific Metering Data processing requirements for metering installation types 1, 2, 3 and 4	In NEM procedures headings have no meaning. Each of the paragraphs in this section needs to be prefaced with "For each Type 1, 2, 3 and 4 metering installation."		
3.7	Specific Metering Data processing requirements for Special Sites	In NEM procedures headings have no meaning. Each of the paragraphs in this section needs to be prefaced with "For special sites…."		
3.8	Specific Metering Data processing requirements for metering installation type 7	In NEM procedures headings have no meaning. Each of the paragraphs in this section needs to be prefaced with "For Type 7 metering installations …." AEMO may want to consider using sub clauses as this would be a cleaner drafting approach and links all the current paragraphs to the type 7 metering obligations		
3.9	Specific Metering Data estimation requirements for	In NEM procedures headings have no meaning. The		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
	metering installation types 4A, 5, 6 and 7	paragraph in this section needs to be prefaced with "For each manually read metering installation …."		
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.		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		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. The draft version of the MDP		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		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. 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		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		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.		
3.11	Delivery of Metering Data for Prudential Purposes	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. Clause (a) (ii) should refer to remotely read meters as clause (b) deals with manually read meters.		
3.12	Interface requirements	3.12 (b) needs to be expanded to cover ENMs.		
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,		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		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.		

12. Service Level Procedures for MP

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
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?		
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.		
4.1	General commissioning requirements	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		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		arrangements where the distributor is involved and undertakes the interruption of supply to a number of customers with a distributor planned interruption notice. 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.		
4.2	Metering Data Validation Requirements	**Feedback Point A:** The MP is to validate remotely read small customer metering		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		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. **Feedback Point B:** Under a) insert additional point – meter data shall be collected on a daily basis from the meter. 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. Please refer to related comments in Service Level		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		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.		
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. UE does not support the removal of the following information from the minimum information provided in Table 1. Technician details — The name(s) of the technician performing the work at the *metering*		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		installation Licence number — The licence number of the technician performing the work at the *metering installation* Licence authority — The name of the party issuing the licence to the technician. 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		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		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?		
4.4	Meter Churn	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. 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		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		which will result in wasted truck visit penalties being applied. 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. UE recommend drafting clause 4.4 (a) (1) *to make reasonable endeavours to contact the current MDP and LNSP*. 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		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		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. 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 registered participants. AEMO suggests that tampering notification be dealt with in the MC-FRMP		

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		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.		

13. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments

Schedule 1

Suggested drafting amendments MDP SLP clause 3.10

Each MDP must ensure only Validated metering data is delivered to AEMO, New MDPs and Registered Participants.

Subject to any agreement to the contrary as contemplated by section 8.1, for all meter installation types, each MDP must deliver to AEMO, Registered Participants and the New MDP when there has been a Meter Churn;

(a) ~~deliver to AEMO, the New MDP when there has been a Meter Churn and Registered Participants~~ all validated 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.

~~Subject to any agreement to the contrary as contemplated by section 8.1, each MDP must Validate and deliver to AEMO, the New MDP when there has been a Meter Churn and Registered Participants all substituted metering data within two business days of the metering data being Substituted~~.

For ~~*metering installations*~~ type 4A, 5, 6 and 7 *metering installations*, subject to any agreement to the contrary as contemplated by section 8.1, the MDP must validate and deliver to AEMO, ~~the New MDP when there has been a Meter Churn~~ and *Registered Participants* all *estimated metering data* within two business days of the *metering data* being Estimated.

~~The~~ Each MDP must provide *metering data* to the relevant FRMP within two *business days* of receiving a completed notification of a change of FRMP, including *estimated metering data*, for a type 4A, 5, 6 or 7 *metering installation*.

~~The~~ Each MDP must ensure that all failed Validations are reviewed promptly such that:

(a) where the initial review of the failed Validation identifies that the Actual Meter Readings are~~is~~ valid, deliver the Actual Meter Readings to AEMO, the New MDP when there has been a Meter Churn and *Registered Participants* within two *business days* of the *metering data* being received into the *metering data services database*; and

(b) where further information is required to Validate the Actual Meter Readings, and the receipt of such information identifies that the Actual Meter Readings are~~is~~ valid, deliver the Actual Meter Readings to AEMO, the New MDP when there has been a Meter Churn and *Registered Participants* within two *business days* of the *metering data* passing Validation.

~~The~~ Each MDP must deliver *metering data* that has passed Validation to *AEMO* for the periods specified in the *timetable* for all *connection points* that the MDP is nominated in MSATS, for the specified weekly periods:

(c) to a quantity level of at least 98% complete *metering data* for all settlement weeks;

(d) to a quality level of at least 98% 'actual' or 'final', for periods specified as four monthly and six monthly revision settlement weeks only; and

(e) by 5pm on the *day* specified in the *timetable*~~*Data Delivery Calendar*~~ for the relevant settlement week.

Subject to any agreement to the contrary as contemplated by section 8.1, ~~the~~ each MDP must ensure that all *metering data* is delivered to AEMO, the New MDP when there has been a Meter Churn and *Registered Participants* for the full period of any retrospectively created Datastreams within two *business days* of that Datastream becoming active in MSATS.

Subject to any agreement to the contrary as contemplated by section 8.1, ~~the~~ each MDP must:

(f) deliver *metering data* to the New MDP when there has been a Meter Churn in accordance with this Procedure by delivering the *metering data* via a method and in the format agreed;

(g) deliver *metering data* to *Registered Participants* in accordance with this Procedure by delivering the *metering data* for each configured NMI data stream (e.g. E1, B1, Q1, K1) to the *B2B e-Hub* in the MDFF or via a method and in the format agreed; and

(h) deliver *metering data* to AEMO in accordance with this Procedure by delivering the *metering data* to the MDP's MSATS inbox in the MDM Data File.

The MDP must notify AEMO and affected *Registered Participants* immediately upon the identification of any operational delays which impact on normal expected *metering data* delivery.

The MDP must have a process to support the receipt and actioning of provide and Verify Meter Data Requests in accordance with the B2B Procedures.