METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Jemena Electricity Networks (Vic) Ltd*

Completion Date: *20 July 2016*

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Jemena does not support the changing the RWD code to VICAMI code. Refer to our comments under 'General Feedback on Draft Report and Determination' 6

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General Feedback on Draft Report and Determination

Reference	Comment
	VICAMI Metering Installation Type Code AEMO considers that an update of VICAMI NMIs from the currently used metering installation type codes to the proposed VICAMI code is unnecessary and does not add any value. For Jemena & other participants this will require system changes. The Victorian distributors have rollout approximately 2.8 million type 5 AMI meters. The industry collectively agreed to use MRIM and RWG metering codes for these type 5 AMI meters. We believe this well established meter classification and identification of a Victorian AMI meter in MSATS should continue as there is not benefit for customers or market participants in changing the meter classification from RWD to VICAMI. There should be no VICAMI references in the procedures–instead RWD should take the place of the proposed VICAMI code in the draft procedures. It is worth noting 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. Should AEMO require this change, it will impose cost to market participants including LNSP, FRMP and AEMO for no benefit. Moreover, given the complex procedure changes the industry is required to deliver to very tight deadlines by 1 Dec 2017, we consider this change is of no benefit and significantly risks market participants not meeting other important procedure changes by the target date. Based on the discussions in the AEMO PoC working group, there appears be no support by distributors or retailers to rename the Victorian AMI meters from RWG to VICAMI. It is noteworthy, meters installed in the NEM are deemed to comply with the rules subsequent to a rule change until such time the meter is replaced. We believe that this same grandfathering practice should apply to Victorian AMI meters.
	Updating Network Tariffs AEMO proposes to make the updating of Network Tariff Code field mandatory for Metering Providers (MP). We do not support

Reference	Comment
	this proposal. MPs may know the details of the meter installation, but there is the likelihood of MPs not knowing the correct tariffs to apply as well as timing issues with the tariff updates. We believe this could potentially cause issues around increased volume of Network Billing exceptions and disputes. Assignment of network tariff is the LNSP's responsibility. AER requires distributors to assign the correct network to customers. LNSPs regulated revenues are dependent on the assignment of correct network tariffs. Moreover the purpose of network tariff in MSATS is for NMI discovery and quoting of retail pricing offers to customers. Should AEMO insist on requiring MPs to update the mandatory Network Tariff Code field, it would result in LNSPs still checking all network tariffs are correctly assigned. NZ experience indicates the level of billing exceptions and rework was high resulting in significant cost impacts to retailers and LNSPs.
	LNSP publishing roles during NMI creation AEMO does not agree to allow LNSP to create NMIs in MSATS without adding all the other roles (i.e. FRMP, MP, and MDP). The NER have specified requirements for parties to appoint roles, and as such, no NMI should be created without the retailer being able to provide details on the appointment of the MC, etc. Based on AEMO position, it is not clear to Jemena who will responsible if the roles are populated incorrectly.
	Remote disconnection/ reconnection update on meter level Jemena considers the proposed remote disconnection/ reconnection status in MSATS may potentially lead to the below issues: a) Timing issue AEMO does not think it necessary to specify timeframes for the FRMP obligation to notify the LNSP of remote disconnection and remote reconnection as the NERR provide sufficient guidance on the timeframes for those notifications. It is noteworthy the NERR does not apply in Victoria as it does not fully implemented NECF. Lack of clarity on the process and timeframes might lead to higher instances of 'wasted vehicle visit' fees charged to FRMPs and potentially increase the number of disputes.

Reference	Comment

	SLP MDP Services Procedure (Section 3.3)
	
	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).
	
	This needs to be added into the relevant procedures to clarify the requirements on MDPs to collect Type 1-4 interval data from meters and load into the MDP metering data services database on a daily basis, with a minimum level of quality (actual meter readings).
	
	Meter Data is critical to retailer and network billing activities as well as enabling retailers and networks to fulfil their obligations to provide meter data upon the request of the customer. Jemena proposes to include the following:
	
	• 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:
	  o Meter data must be collected on a daily basis for all remote acquisition meters
	  o Of the meter data collected, no less than 95% being actual data from meters, with the remainder substituted.

	In the draft report and determination AEMO notes: **"Remote Disconnection/Reconnection Notification** AEMO notes that, as per the NERR, the obligation is on the retailer to notify the distributor of remote disconnection and remote reconnection, therefore, AEMO removed this obligation from the Metering Coordinator in MSATS. AEMO does not think it necessary to specify timeframes for the FRMP obligation to notify the LNSP of remote disconnection and remote reconnection as the NERR provide sufficient guidance on the timeframes for those notifications." The NERR does not apply. The Victorian Government has not fully implemented NECF. Therefore it is necessary to specify timeframes for the FRMP to notify the LNSP of remote disconnection and remote reconnection.

Reference	Comment

1. Glossary and Framework

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
Chapter 3	Glossary	Jemena does not support the changing the RWD code to VICAMI code. Refer to our comments under 'General Feedback on Draft Report and Determination'. We suggest AEMO provide a definition for RWD meter in the glossary.		

2. 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	The Victorian Energy Retail Code requires a start index read on customers' bills. This requirement is a key customer protection. Jemena believes customers with Type 4 should also be accorded with the same level of customer protection. We suggest Type 4 should be included in the heading of clause 3.3.4. If AEMO includes Type 4 in the clause 3.3.4, then we suggest in 3.3.4 (a) refers to 'at the time of collection' to cover manually read meter types and 'at the time of the meter reading event' to cover Type		

		4. The index reads for Victorian AMI interval meters are provided as at midnight so that they represent the end of day index read even though interval data is collected on the wireless mesh for the few hours following midnight.		
4.6	B2B details record (500)	The definition for field *RetServiceOrder states:* "The *retailer's* Service Order number associated with the reading event for that *day* (where the reading is directly associated with a B2B Service Order request). This information must only be provided to the Retailer who issued the B2B Service Order request <u>and the LNSP</u>." Jemena proposes that the LNSP included as a recipient of the MDFF files as well.		
H.1	Actual Interval Data – Metering Installations with	The LNSP must also be a recipient of all equivalent		

	Remote Acquisition of Metering Data	meter data. Same response applies to H.2 to H.8.		

3. 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
4.6	Grandfathering	Jemena believe that there should be no "VICAMI", references in the procedure documentation—instead there should be a grandfathering clause under this section that allows the existing Victorian AMI meters installed under 9.9C of the NER to continue in their current classification of MRIM / RWD, and continue using the Type 5.		

4. 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
3.1.	Application of section 3	To avoid doubt and provide certainty, Jemena recommends this clause explicitly include a paragraph in section 3.1 that states: "*For Victorian AMI metering installations installed in accordance with NER section 9.9C the MDP may perform Substitutions in accordance with Section 4*" Reference to "*metering installations* installed under 9.9A, 9.9B" at the end of section 3.3, after the 'Type 20 – Churn Correction' heading, is not helpful. Locating reference this does not allow for the full set of substitution procedures that the Victorian AMI RWD meters. Moving the reference to section 3.1 will comprehensively address the		

		intent of supporting compatibility of the procedures with the current metrology of the existing Victorian AMI meters.		
3.3.	Substitution Types	Jemena is concerned that the reference to *metering installations*, installed under 9.9A, 9.9B and 9.9C of the NER at the very end of section 3.3 is problematic for Victorian distributors. It may not be the intent of AEMO to limit Victorian AMI meters to Substitution types 51 and 52 – but locating this reference at the end of section 3.3 has the unintended consequence of Victorian AMI meters not being able to 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. Also, refer to our described in		

		our response to Section 3.1.		

5. 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	Clause 2.2 (s) does not prescribe a timeframe for the FRMP to notify LNSP of disconnection. It is crucial that LNSPs are advised in real time. There is no obligation on the FRMP to notify LNSPs of de-energisation (as distinct from disconnection). Jemena recommends the procedures prescribe an obligation on FRMPs to notify of disconnection and de-energisation in real time. Where such notifications are not received in a timely manner, Jemena may respond to calls from customers who report that they have lost supply. Should there be a wasted truck visit', the FRMP will be charged a 'wasted truck visit' charge.		

6. 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
		No comments		

7. 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
		No comments		

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

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		No comments		

9. NMI Standing Data Schedule

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
		No comments		

10. Service Level Procedures for MDP

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
3.3	Specific collection process requirements for metering installations type 1, 2, 3 and 4	The draft procedure is inadequate in that it has omitted any service level for remote acquisition meter data collection. It is essential that the MDP Service Levels include the standards for meter data collection frequency and quality for remote acquisition meters to facilitate FRMP and LNSP billing activities. LNSPs must bill no later than business day 10 each month under the NER 6B.A2.4 (a). Jemena 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). (e) distribute the data to LNSP's in alignment with the data collection requirements.		

11. Service Level Procedures for MP

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
4.4	Meter Churn	Section 4.4 makes no reference at all to the MP contacting the LNSP. This section does not address the issue of remote acquisition meters which double as network monitoring and operations devices—for example Victorian AMI meters. It is important for both the LNSP and the MDP be notified		

		before the Meter Churn. Jemena suggests AEMO introduces an additional obligation on the MP who undertakes Meter Churn to notify the LNSP before supply is temporarily disconnected. Failure to notify the LNSP may result in 'wasted truck visit' or 'negative customer experience' and a charge to the FRMP, especially if it is an Victorian AMI meter as the temporary disconnection would indicate a loss of supply and result in the LNSP dispatching a faults 'service truck visit'. This notification must be in an agreed B2B procedures format so that it can be consistent across the NEM, standardisation is preferred with the ability for bi-lateral agreement to opt out to a different standards catered for in the final B2B Rules. Jemena considers it would be efficient to have an industry standard, given Meter Churn will		

		become a high volume activity as the meters reach end of life.		
5.2	Management of Metering Installation Malfunctions	The NER defines ***metering installation malfunction as follows:*** The full or partial failure of the *metering installation* in which the *metering installation* Clause 5.2 Management of Metering Installation Malfunctions Clause 5.2 stated: The MP must have processes and systems to support the MC in identifying and rectifying a *metering installation malfunction* in the timeframes specified in clause 7.8.10(a)(1) and (2) of the NER. The specified timeframe in clause 7.8.10 is " if a *metering installation malfunction* occurs to the *metering installation*, cause repairs to be made to it as soon as practicable but no later than 10 *business days* after the *Metering Coordinator* has been notified		

		of the *metering installation malfunction*." Jemena considers the timeframe for rectifying faulty meters is inadequate, when the meter is faulty to the extent that the customer is without supply. "10 *business days* "timeframe may be satisfactory for CT metered supply connections, where a faulty meter will not interrupt supply. Jemena suggest AEMO include an obligation to replace faulty meters immediately following advice from the LNSP, who is normally the first responder to supply outage calls from customers.		

12. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments