Endeavour Energy

19 July 2016

Dr Anthony Marxsen
Chairman
Australian Energy Markets Operator
GPO Box 2008
MELBOURNE Vic 3001

By email: poc@aemo.com.au

Dear Dr Marxsen

RE: AEMO – Power of Choice Procedure Changes (Package 1) – Draft Determination (29 June 2016)

Endeavour Energy welcomes the opportunity to provide feedback on AEMO's draft determination – Power of Choice Changes (Package1).

AEMO's consultation process follows the Australian Energy Markets Commission (AEMC) Power of Choice program which implemented a number of rule changes designed to promote competition in metering and other emerging energy services. In particular, the following amendments were made to the National Electricity Rules (NER):

- National Electricity Amendment (Expanding competition in metering and metering related services) Rule 2015.
- National Electricity Amendment (Embedded Networks) Rule 2015.
- National Electricity Amendment (Meter Replacement Processes) Rule 2016.

As a consequence of these reforms, AEMO is required to amend existing procedures and develop several new procedures by 1 September 2016. Broadly, we support the amended and new procedures and consider they collectively give effect to the AEMC's Power of Choice reforms. Our key comments on the suite of procedural changes are as follows:

- The Meter Provider who removes a piece of equipment should be responsible for its disposal unless the owner of the equipment wants it returned.
- Determining if a piece of equipment is a network device should be based on the equipment providing functionalities beyond metering.
- The obligation for notifying the LNSP of a remote disconnection and reconnection should only be from the party who performed the work, should be near real time and via the B2B/SMP.

- When a market connection point changes to become a child connection point in an embedded network, then the NMI for the market connection point should be extinct and a new NMI created for the child connection point.
- There is support for a national metering work notification process to replace the existing NOSW in NSW. While this is developed the current business practice, where notifications must be provided to the LNSP in the form and formats defined by the LNSP, must continue.

This is a challenging work programme and timeframe and we appreciate the consultation undertaken by AEMO to date. Our detailed comments on each of the amended or new procedures are attached to this response in the manner requested by AEMO. We would welcome the opportunity to work collaboratively with AEMO and other stakeholders in developing these procedures further.

If you have any queries or wish to discuss this matter further please contact Glenn Ryan, Project Director Metering and Customers at Endeavour Energy on (02) 9583 7591 or via email at glenn.ryan@endeavourenergy.com.au.

Yours sincerely

Rod Howard
Acting Chief Executive Officer

Attachment: Endeavour Energy's detailed comments on each of the amended or new procedures

METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Endeavour Energy*

Completion Date: *18 July 2016*

Table of Contents

1. Glossary and Framework 3
2. Meter Data File Format 4
3. Metrology Procedure: Part A 10
4. Metrology Procedure: Part B 30
5. MSATS Procedures: CATS Procedure Principles and Obligations 42
6. MSATS Procedures: MDM Procedures 63
7. MSATS Procedures: Procedure for the Management of WIGS NMIs 64
8. NEM RoLR Process Part A and B – MSATS Procedure: RoLR Procedures 65
9. NMI Standing Data Schedule 66
10. Service Level Procedures for MDP 67
11. Service Level Procedures for MP 72
12. Other Issues Related to Consultation Subject Matter 79

1. Glossary and Framework

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Clause	Heading	Participant Comments		
		Metering Competition	**Embedded Networks**	**Meter Replacement Processes**
1.3	Related Documents	Procedural improvement: The table in clause 1.3 makes reference to a document called 'NMI Data Schedule', however the full title of this document is 'NMI Standing Data Schedule' We suggest to avoid confusion the full title should be used. Also the location link for this document is incorrect. We suggest that the correct link is identified and corrected.		
Chapter 3	Glossary (ADL)	Procedural improvement: To avoid confusion the term ADL should also include the following in the definition: "The ADL is stored in the NMI datastream record in MSATS. Therefore if more than one datastream record is defined, the		

		ADL for the connection point (NMI) must be split up across the defined datastreams."		
Chapter 3	Glossary (NMI Site Address)	Procedural improvement: The term NMI Site Address is redundant because it has the same definition as the term NMI Address. We suggest deleting the term NMI Site Address because it is not used in any procedure.		
Chapter 3	Glossary (NSRD)	Procedural improvement: The definition of the term NSRD suggests that this is a Read Type Code and to refer to section 4.13 of the CATS Procedures. However NSRD is not a Read Type Code. We suggest deleting the last two sentences in the definition to eliminate confusion.		

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
1.2	Definitions and Interpretation	Procedural improvement: The current version of the document states that "In this document, a word or phrase that is *in this style* (i.e. italicised and underlined) is a reference to a specific field or record within the MDFF." This statement should be re-inserted in section 1.2 so that it is clear to the reader what these words and phrases mean.		
2	GENERAL RULES AND INFORMATION	Procedural improvement: Currently the obligation in clause 2.c is on a reasonable endeavour and this should be maintained because the 1MB file size restriction in the B2B procedure means that there are scenarios where complying with this obligation at all times would be complex and costly to implement. We suggest rewording clause 2.c to: "The MDP must use reasonable endeavours to ensure that all NMI suffixes associated with a		

		NMI for a single read event/date are included in the same 100-900 event block.”		
4.3	NMI data details record (200)	Procedural improvement: The definition of the RegisterID field should make this field mandatory for type 1-3 given that the equivalent field in MSATS is mandatory. This is required to allow linking of the metering data to key standing data in MSATS.		
4.3	NMI data details record (200)	We submitted comments in the initial consultation and have noted AEMO’s response and wish to provide further feedback with an alternate suggestion. AEMO’s rewording to the MeterSerialNumber field definition does not provide any further clarity because it only references the Standing Data for MSATS document and does not point to which clause or field. We maintain that this should be reworded to use terms defined in the glossary to avoid any confusion. Also the word ‘must’ is more appropriate than ‘should’. Procedural improvement: The		

		definition of the MeterSerialNumber field should use terms defined in the glossary to avoid any confusion. We suggest that this be reworded to: "'The Meter Serial ID. This must be the Meter Serial ID of the removed meter for IntervalDate prior to the meter replacement and the Meter Serial ID of the installed meter on the IntervalDate when the meter is replaced." Note that we have also suggested rewording the definition of Meter Serial ID in the glossary to: 'A serial number that uniquely identifies each *meter* associated with a *NMI*. This serial number must be prominently visible on the front of the meter.'		
4.3	NMI data details record (200)	Procedural improvement: The definition of the MeterSerialNumber field should make this field mandatory for historical data given that the equivalent field in MSATS is mandatory. This is required to allow linking of		

		the metering data to key standing data in MSATS.		
5.3	Basic meter data record (250)	We submitted comments in the initial consultation and have noted AEMO's response and wish to provide further feedback with an alternate suggestion. AEMO's rewording to the MeterSerialNumber field definition does not provide any further clarity because it only references the Standing Data for MSATS document and does not point to which clause or field. We maintain that this should be reworded to use terms defined in the glossary to avoid any confusion. Also obligations with regards to which meter serial id to use when a meter is replaced is not applicable to the NEM13 and should be removed. Procedural improvement: The definition of the MeterSerialNumber field should use terms defined in the glossary to avoid any confusion. We suggest that		

		this be reworded to: "'The Meter Serial ID." Note that we have also suggested rewording the definition of Meter Serial ID in the glossary to: 'A serial number that uniquely identifies each *meter* associated with a *NMI*. This serial number must be prominently visible on the front of the meter.'		

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**
	Whole document	Procedural improvement: This document is harder to read and reference compare to the current version because of the inconsistent numbering of procedural obligations and lack of sub-clauses as a reference to each obligation. We suggest that all procedural obligations be referenced with a clause number – see the current version as an example.		
New Clause	Location with the procedure to be determined by AEMO	Procedural improvement: New obligations should be added to support clauses 11.86.7.g.3 and 11.86.7.h of the NER. Although the NER already define the required actions we believe that by explicitly defining the timing obligation it would allow for better certainty for the customer and the market. We have taken into account AEMO's response in the initial		

		consultation and have reworded our suggestion accordingly. We suggest the following: 1. When a MC for a type 5 or 6 *metering installation* becomes aware of a *metering installation malfunction* then the MC must notify the FRMP within three business days. 2. The FRMP must appoint a *Metering Coordinator* within two *business days* of the above notification		
3.1	Overall requirements	Grammar error: The first paragraph contains the word 'the' when it is not required. We suggest rewording to: "MCs must use MPs to provide, install, test and maintain the relevant components, characteristics and service requirements of the *metering installation* as specified in the NER and this Procedure, as appropriate."		
4.1	Requirement under National Measurement Act and Use of Standards	Procedural improvement: For consistency the 3rd paragraph should include type 4A. We note		

		that AEMO's response in the initial consultation is 'Type 4A cannot be a VT connected meter'. However given that a type 4A is a type 4 meter without communications and a type 4 can be VT connected, and customers with a low enough consumption to be a type 5 or 6 can be VT connected, it is not clear why AEMO does not believe a type 4A cannot be VT connected? Given that this paragraph places an obligation on the Australian Standards that the VT must comply with we suggest that references to meter types be removed or if they are to remain then for consistency and for completeness the type 4A should be added. If the latter is adopted then we suggest rewording to: "New VTs for type 1, 2, 3, 4, 4A, 5 and 6 *metering installations* must meet the relevant requirements …"		
4.1	Requirement under National Measurement Act and Use of	Grammar error: The fourth paragraph contains the word 'must' when it is not required as		

	Standards	it is already mentioned earlier in the sentence. We suggest rewording to: "Unless otherwise permitted by the NER, the MC must ensure that new *meters* and related equipment intended to be used at a *connection point* must have a valid pattern approval issued under the authority of the National Measurement Institute …"		
4.3	Password Allocation	Procedural improvement: The assignment of the read-only password should include the MDP because operationally the MDP would require this to perform their duty in collecting metering data. We suggest rewording clause 4.3 to: "The MP must allocate "read-only" passwords to MDPs, FRMPs, LNSPs and AEMO, except where separate "read-only" and "write" passwords are not available, in which case the MP must allocate the password to AEMO and the MDP only."		

4.4	"x" values – Calculation and use	Procedural improvement: A new obligation should be added to manage the scenario when a metering installation breaches the x value. We have taken into account AEMO's response in the initial consultation. Although the NER already define the obligations for the given scenario we believe that by explicitly defining who is responsible and the timing obligation it would allow for better certainty for the customer and the market. We have also our amended our suggestion to only used defined terms. We suggest inserting the following obligations: 1. When the FRMP becomes aware that a *connection point* no longer complies with clause 4.4 then the FRMP must appoint a MC within two *business days* for *small customers* or within five *business days* for *large customers* who decided not to appoint their own MC.		

		2. A MC who is appointed because the *metering installation* no longer complies with clause 4.4 must make the *metering installation* compliant within 10 *business days* of being appointed.		
4.5	“y” values – Calculation and use	Procedural improvement: For consistency this clause should have similar wording as clause 4.4. We suggest rewording clause 4.5 to: “*Connection points* must not be aggregated when determining the annual consumption or the ADL as the basis of the comparison with the volume threshold for "y".”		
4.5	“y” values – Calculation and use	Procedural improvement: A new obligation should be added to manage the scenario when a metering installation breaches the y value. We have taken into account AEMO’s response in the initial consultation. Although the NER already define the obligations for the given scenario we believe that by explicitly defining who is		

		responsible and the timing obligation it would allow for better certainty for the customer and the market. We have also our amended our suggestion to only used defined terms. We suggest inserting the following obligations: 1. When the FRMP becomes aware that a *connection point* no longer complies with clause 4.5 then the FRMP must appoint a MC within two *business days* for *small customers* or within five *business days* for *large customers* who decided not to appoint their own MC. 2. A MC who is appointed because the *metering installation* no longer complies with clause 4.5 must make the *metering installation* compliant within 10 *business days* of being appointed.		
5.1	Minimum Service Levels	Procedural improvement: Clause 5.1.2 contains two paragraphs that state the same thing with different wordings. We suggest		

		deleting one of the paragraphs.		
10.1	Installation by ASPs	Procedural improvement: The whole of clause 10.1 should be removed because it is redundant.		
11.1	Initiation of a Meter Churn			We submitted the below comments in the initial consultation, however this comment is not in Appendix A of AEMO's draft determination. We have repeated our comments again. The current clause suggests that only the Current MC can initiate a meter churn. This should include the New MC so that the meter can change first and then later the MC can become the Current MC with an effective start date that aligns with the meter change date. Take into consideration a type 6 to type 4 meter change scenario. The Current MC who is the LNSP would not be initiating the meter change to a type 4, it would be the New MC who would do this. Procedural improvement: a New MC can also initiate meter churn. We suggest rewording clause 11.1 to 'The Current MC or the New MC for a *metering installation* can initiate a

				Meter Churn’
11.2	Performance of a Meter Churn			We submitted the below comments in the initial consultation, however this comment is not in Appendix A of AEMO’s draft determination. We have repeated our comments again. The current clause suggests that a MP with the appropriate accreditation can perform a meter churn. However it is not any MP with the appropriate accreditation, it is only the Current or New MP with the appropriate accreditation that can perform a meter churn. Procedural improvement: Clause 11.2 is ambiguous. We suggest rewording to ‘The Current MPB or the New MPB with the appropriate accreditation can perform a Meter Churn’
11.3	Meter Churn Process			We submitted the below comments in the initial consultation, however this comment is not in Appendix A of AEMO’s draft determination. We have repeated our comments again. The term New MP is not defined but the term New MPB is defined.

				Procedural improvement: Clause 11.3.a should use defined terms to avoid confusion. We suggest rewording to 'information is made available to any New MPB to facilitate the Meter Churn, which includes:'
11.3	Meter Churn Process			We submitted the below comments in the initial consultation, however this comment is not in Appendix A of AEMO's draft determination. We have repeated our comments again. The term Site refers to a physical location. We believe that the intent was to provide the address of the Site. Given the changes in the glossary terms in the draft determination we have reworded our suggestion accordingly. Procedural improvement: Clause 11.3.a.ii suggests that the MC provides to the New MPB the Site which is impossible. We suggest that this be reworded to 'the address of the Site;'

11.3	Meter Churn Process			We submitted the below comments in the initial consultation, however this comment is not in Appendix A of AEMO's draft determination. We have repeated our comments again. The term Current MP is not defined but the term Current MPB is defined. Procedural improvement: Clause 11.3.a.iv should use defined terms to avoid confusion. We suggest rewording to 'the name of the Current MPB and its Participant ID;'
11.3	Meter Churn Process			We submitted the below comments in the initial consultation, however this comment is not in Appendix A of AEMO's draft determination. We have repeated our comments again. The term Metering Installation Type is not defined but the term Metering Installation Type Code is defined. Procedural improvement: Clause 11.3.a.vi should use defined terms to avoid confusion. We suggest rewording to 'the current Metering Installation Type Code; and'

11.3	Meter Churn Process			We submitted the below comments in the initial consultation, however this comment is not in Appendix A of AEMO's draft determination. We have repeated our comments again. The term New MP is not defined but the term New MPB is defined. Procedural improvement: Clause 11.3.c should use defined terms to avoid confusion. We suggest rewording to 'the start date for any New MPB or New MDP is:'
12	DE-COMMISSIONING AND REMOVAL OF METERING EQUIPMENT AND NETWORK DEVICES	Procedural improvement: Clause 12.b should be worded similar to clause 3.2 in the Service Level Procedure (MP). Note that we have suggested rewording for clause 3.2 in the Service Level Procedure (MP). We have taken into account AEMO's response in the initial consultation and wish to provide more justification. Although the current clause does not restrict parties from agreeing to not return the equipment, it		

		does define the default arrangement which is to return the equipment. AEMO also stated that there are appropriate incentives on all parties to ensure an efficient process for return and disposal is agreed. However in the absence of an agreement the default defined by AEMO is to return the equipment. This means that by default the owner of the asset bears the responsibility and cost for the disposal. Moving forward there will be a large volume of type 5 and 6 metering equipment that will be removed which are not economical to refurbish and would require disposal. We believe that the party who removed the equipment should be responsible for the disposal if the asset owner does not want the equipment returned. This is to ensure that disposal costs are not cross subsidised by customers who have exercised their choice to not have smart meters. By defining explicit obligation on the disposal, as opposed to relying on agreements, we		

		believe that this would deliver better outcomes for customers. We suggest rewording clause 12.b to: 'The ownership of the existing *meter* and *network device* is ascertained and arrangements made to: i) Return the *meter* and *network device* to its owner within 10 *business days* of the removal if the owner wants the asset back, or ii) Dispose the removed *meter* and *network device* if the owner does not want the asset back.'		
12	DE-COMMISSIONING AND REMOVAL OF METERING EQUIPMENT AND NETWORK DEVICES	We submitted the below comments in the initial consultation, however we note that AEMO did not respond to the comment. We have repeated our comments again. There should be no reason why the MP who removes a type 6 meter cannot obtain and provide the final reading to the Current MDP. By placing an obligation on the asset owner to obtain the		

		final reading for a type 6 meter it transfers the obligation from the MP who removed the meter to the asset owner as the default responsible party. We suggest that to remove any doubt and avoid encouraging inefficient operational practices the obligation for obtaining the final reading of a type 6 meter be defined as only the MP who removed the meter. Procedural improvement: The MP removing a type 6 meter should be responsible for obtaining the final meter read and providing to the Current MDP. We suggest rewording the last paragraph to: 'Where Actual Meter Reading from a removed meter is not transferred to the Current MDP at the time of de-commissioning then i) The MP who removed the meter must provide the Actual Meter Reading to the Current MDP within two		

		business days of the meter removal if the removed meter was a type 6 ii) The MP who removed the meter must make arrangements with the Current MDP to obtain the Actual Meter Reading within 20 *business days* of the meter removal if the removed meter was a type 1, 2, 3, 4, 4A or 5.'		
12	DE-COMMISSIONING AND REMOVAL OF METERING EQUIPMENT AND NETWORK DEVICES	Procedural improvement: The last paragraph was added in the draft determination. However it looks out of place. This section is about de-commissioning and removal while the last paragraph is about installing and operation of equipment. We suggest that this last paragraph be deleted from this section.		
12.1	Network Devices	Procedural improvement: The first paragraph of Clause 12.1.1 is ambiguous.		

		We note AEMO's response and revised re-wording, but under the current drafting it is not clear that a network device can be a meter that is no longer used for energy measurement associated with the application of a network tariff. We suggest rewording to: "For the purposes of clause 7.8.6 of the NER, any *meter* that provides functionality to monitor, operate or control the *network* for the purposes of providing *network services* must be treated as a *network device."*		
12.1	Network Devices	Procedural improvement: The second paragraph of Clause 12.1.1 should be re-worded to not preclude the metrology procedure. Although this paragraph exists in the current metrology procedure, its purpose in the new arrangement should be re-considered. Equipment for load control is, by definition, a network device and is now		

		considered in the NER and metrology procedure. Similarly reactive energy is now considered in the NER and metrology procedure. We suggest rewording to: "Where the metering installation includes equipment for load control or the measurement of reactive energy, the installation and operation of that equipment may be governed by other instruments in addition to the metrology procedure, for example, a 'use of system' agreement between the LNSP and the FRMP."		
12.1	Network Devices	Procedural improvement: Clause 12.1.4 is ambiguous because it does not including timing obligations. We suggest a 2 business day SLA for notifying the removal of a network device. In addition we suggest that the NMI be included in information provided to the LNSP. We suggest rewording to: If an MC removes a *network device* in accordance with clause		

		7.8.6(f) of the NER, the MC must, in addition to providing the notifications required by clause 7.8.6(g) of the NER, provide the following records in electronic format to the LNSP within 2 business days of the network device removal: a) The records defined in clause 7.8.6(h) of the NER; b) The NMI, type, asset number and serial number of the *network device* removed, the name of the *network device* owner, where those details are provided on the *network device* itself; and c) The type, asset number and serial number of any additional *network device* that was not removed, the name of the *network device* owner of any other *network device* where those details are provided on the *network device* itself.		
13.2	Metering Data Collection	We submitted the below comments in the initial consultation. AEMOs' response is 'agreed',		

		however the procedure was not updated. We have repeated our comments again and request that the procedure be updated accordingly. Procedural improvement: The paragraph states 'The MC must use reasonable Endeavours to ensure that energy data is collected from a type 5 or 6 *metering installation* and transferred to the relevant *metering data services database* no more than two *business days* prior to, or two *business days* subsequent to, the Scheduled Read Date for that *metering installation*.' This is inconsistent with clause 3.4.e and 3.4.f of the Service Level Procedure (MDP). We suggest rewording this paragraph to align with clause 3.4.e and 3.4.f of the Service Level Procedure (MDP).		

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
	Whole document	Procedural improvement: This document is harder to read and reference compare to the current version because of the inconsistent numbering of procedural obligations and lack of sub-clauses as a reference to each obligation. We suggest that all procedural obligations be referenced with a clause number – see the current version as an example.		
2.2.	Substitution requirement	Procedural improvement: The following text was removed "Where metering data has not completed Validation as part of the registration or transfer of a connection point." This text should be re-instated because metering data must be substituted in the scenario contemplated by this text.		

2.3.	Estimation requirement	Spelling mistake: Clause 2.3.a has a word 'NSRDe' when it should be 'NSRD'		
2.4.	Metering data quality flags	Procedural improvement: We note that the key word 'accepted' is removed from the description of the 'A' quality. The term Validated is not defined in the glossary, however even if this term is taken to mean the past tense of Validation, which is defined, then at best it only means that the metering data has undergone a process to test the veracity and integrity of metering data, it does not mean that it did pass the test. We suggest rewording the description of the 'A' quality to: "For *metering data* that passed Validation."		
2.4.	Metering data quality flags	Grammar error: Clause 2.4.b contains the word 'metering data' twice. One of them should be deleted.		
2.4.	Metering data quality flags	Formatting error: The last paragraph in clause 2.4 should be referenced as 2.4.h as it is referenced earlier in this section.		
3.1.	Application of section 3	Formatting error: There should be		

		a space between '3.3' and 'the'.		
3.3.	Substitution Types	Grammar error: Type 13 – SCADA, sub-clause b) the full stop after the first sentence should be a comma.		
3.3.	Substitution Types	We submitted comments in the initial consultation and have noted AEMO's response and wish to provide further feedback with an alternate suggestion. Obtaining prior agreement for type 1-3 metering installations should be mandatory because the amount of energy concerned is significant and would impact on customers, networks and retailers if the substitution is not performed as accurately as possible. We believe that this is a reasonable obligation given that this is the current obligation, metering competition does not directly impact the volume of these metering installations and that it is in the interest of all parties to agree to a substitution method given the significant amount of energy concerned. Procedural improvement:		

		Obtaining prior agreement should be mandatory before using type 16 for type 1-3 metering installations to ensure that billing disputes are minimised, especially given that a MDP is allowed to change the quality flag to 'F' without seeking agreement. We suggest rewording type 16 to: "Where the *Metering Data Provider* is required to undertake a *metering data substitution* for any period greater than seven days for type 1-3 *metering installations*, consultation and agreement must be obtained from the *financially responsible Market Participant*, the *Local Retailer* and the *Local Network Service Provider* for the *connection point* as to the *metering data substitution* to be performed. Where the MDP is required to undertake Substitution for any period greater than fifteen *days* for other *metering installation* types, the MDP must consult and use reasonable endeavours to reach an agreement with the FRMP, LR and the LNSP for the *connection point*. This may include changes to existing		

		metering data substitutions for any period which were carried out where the affected parties have directed that as a result of site or customer specific information, the original *metering data substitutions* are in error and a correction is required."		
4.1.	Application of section 4	Procedural improvement: To avoid a circular contradiction, the second paragraph should state that type 5 meters with communications can use substitutions listed in this section. We suggest rewording the second paragraph to: "The Substitution and Estimation requirements in this section 4 are only to be used for *metering installations* where *interval metering data* is manually collected as a Scheduled Meter Reading and for *metering installations* with *remote acquisition* installed in accordance with NER section 7.8.9(b). In the case that *remote acquisition* of *metering data* has failed at the *metering installation* and manual collection of *interval*		

		metering data is required, the Substitution requirements specified in section 3 apply."		
4.2.	Substitution and Estimation Rules	Procedural improvement: Type 57 - Prior to First Reading - Customer Class Method has a new obligation where the MDP must obtain agreement from the FRMP, the LR and the LNSP. We believe that this extra obligation should be removed because the amount of energy concerned is not significant and the extra burden of obtaining agreement from the FRMP, the LR and the LNSP is not proportional to the risk that the substitution is not accurate, nor does it align with AEMO's reasoning for other substitution methods where absolute agreement is not required. In addition we believe that the metering competition rule change does not impact on the use of this substitution method therefore the current obligation should be maintained.		
5.2.	Substitution and Estimation Rules	Procedural improvement: Clause 5.2.b contains the word 'next' which is redundant and may		

		cause confusion. Clause 5.2.b should allow for the scenario where during a schedule meter reading it is discovered that the accumulation meter is replaced by an interval meter. This is a scenario we expect to occur more often due to the metering competition rule change. The current obligation stipulates that a final substitution must be undertaken. However it would be reasonable to expect to have the final reading from the removed accumulation meter soon after therefore a substitution with an S flag would be more appropriate. We suggest rewording clause 5.2.b to: "When the Scheduled Meter Reading could not be undertaken, the MDP must replace the *estimated metering data* with *substituted metering data* with a quality flag of F unless it was identified that the *metering installation* no longer has an Accumulation Meter installed in which case a quality flag of S may be used."		

5.3.	Substitution and Estimation Types	Procedural improvement: Type 68 – Zero clause b suggests that this substitution method can be used as a result of a meter churn in accordance with the Service Level Procedures (MDP). However the Service Level Procedures (MDP) does not stipulate when this substitution method could be used for a type 6 meter. This causes confusion and we suggest that clause b from Type 68 – Zero be removed.		
6.1.	Substitution Rules	Formatting error: Clause 6.1 has two instances of sub-clause a) and b)		
6.1.	Substitution Rules	We submitted the below comments in the initial consultation. AEMOs' response is 'Provision re-drafted', however the procedure was not updated as suggested. Clause 6.1.(b) stipulates that in the given scenario the substitution must be flagged as S but later in clause 6.1 it is contradicted because it states that 'The MDP must flag all *calculated metering data* Substitutions as final (F).' The metering competition rule change does not impact on		

		unmetered supplies therefore we believe that changing obligations that comes with a cost to industry is unwarranted. Procedural improvement: Clause 6.1.(b) states that '… when the Inventory Table is subsequently updated for the period concerned, the *calculated metering data* must be flagged as S *metering data*'. However previously the obligation was to flag it as a 'F'. We suggest that this obligation be reverted back to the 'F' flag to eliminate unnecessary cost for system changes.		
9.2.	Validation of metering installations with remote acquisition of metering data	Formatting error: Clause 9.2 has two instances of sub-clause a) and b)		
9.2.	Validation for manually read interval metering installations	Procedural improvement: It is not clear why some of the obligations only apply to whole current metering installations when it should be equally applied to non-whole current metering installations too. We suggest that the obligations be consolidated and be applicable to all metering installations		

9.3.	Validation for manually read interval metering installations	Formatting error: Clause 9.3 has two instances of sub-clause a), b) and c)		
9.3.	Validation for metering installations with accumulated metering data	Procedural improvement: It is not clear why some of the obligations only apply to whole current metering installations when it should be equally applied to non-whole current metering installations too. We suggest that the obligations be consolidated and be applicable to all metering installations		
10.1.	General validation requirements	Procedural improvement: The change to the heading and lead-in clauses that defined the scope of sections based on meter type to metering installations with remote acquisition has inadvertent impact on obligations. AEMO addressed this issue by insert a clause that that allows for meters installed under 7.8.9.b of the NER to apply obligations that would normally apply to manually read interval meters. We suggest that a similar clause should be added in section 10.1 for consistency and to eliminate any doubt that this also applies to validation of metering		

		data. We suggest adding a new paragraph in section 10.1: "For *metering installations* with *remote acquisition* installed in accordance with NER section 7.8.9(b), the MDP may perform Validation in accordance with section 10.4 and 10.5 instead of 10.2."		
10.7.	Validations to be performed for metering installations with calculated metering data	Formatting error: Clause 10.7 should have sub-clauses that start from a)		
11.2.	Profile Preparation Service - Controlled Load Profile	We submitted comments in the initial consultation and have noted AEMO's response and wish to provide further feedback and provide an alternative suggestion. Procedural improvement: Clause 11.2.1.b stipulates that the sample meter is to be treated as a type 4 meter. However AEMO decided, and published in the Power Of Choice Information Paper issued 8 April 2016, that the sample meter be considered as a network device (section 4.3,		

		page 89). We suggest that clause 11.2.1.b be updated to reflect this decision and to remove any contradictions. We suggest rewording clause 11.2.1.b to: "Sample *meters* are to be treated as a *network device*"		

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**
Various	All metering CR	Procedural improvement: We support United Energy's proposal to make the MDM Contributory Suffix field mandatory for all Change Requests that creates or modifies Meter Register information. This would include Change Requests 2500, 2501, 2520, 2521, 3000, 3001, 3004, 3005, 3050, 3051, 3080, 3081, 3090 and 3091. This is required to allow linking of the metering data to key standing data in MSATS.		
2.2	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	We submitted comments in the initial consultation and have noted AEMO's response and wish to provide further feedback and provide an alternative suggestion. The notification of a remote		

		disconnection is required in near real time to minimise investigation costs and to provide a quicker response for outage enquiries from a customer. The quickest way to receive the notification is to get it from the party who performed the remote disconnection. We suggest that the obligation on the retailer is to ensure that the notification is provided instead of obligating the retailer to provide the notification themselves. Procedural improvement: We suggest that clause 2.2.r be reworded to: "Ensure the LNSP is informed when a *connection point* is remotely *disconnected* or remotely *reconnected* unless the remote *disconnection* or remote reconnection has been arranged by the LNSP."		
2.3	LOCAL NETWORK SERVICE PROVIDER	We submitted comments in the initial consultation and have noted AEMO's response and wish to provide further feedback.		

		We understand that the first part of clause 2.3.e is an existing obligation. However in context of the new metering competition arrangement this obligation is redundant. When the retailer wants a new NMI created they will need to raise a B2B NMI Allocation Service Order which contains the ADL as a mandatory field. We believe that given the retailer will be engaging the MDP via a MC, the retailer should provide the ADL directly. It is inefficient and inappropriate to make the LNSP, who is not a party to the commercial agreement between the retailer and MC and MDP, to be a messenger of information that the LNSP does not own. In a similar manner the New MDP can obtain the existing ADL from MSATS from the FRMP via NMI Discovery Search 2. We suggest that the obligation in clause 2.3.e be deleted.		
2.3	LOCAL NETWORK SERVICE PROVIDER	Procedural improvement: Clause 2.3.n is a duplicate of clause 7.13.2 of the NER. Consistent		

		with AEMO's principle to not duplicate NER obligations this clause should be deleted.		
2.3	LOCAL NETWORK SERVICE PROVIDER	Procedural improvement: Clause 2.3.o is a duplicate of clause 7.13.3 of the NER. Consistent with AEMO's principle to not duplicate NER obligations this clause should be deleted.		
2.3	LOCAL NETWORK SERVICE PROVIDER	Procedural improvement: Clause 2.3.p places an obligation on the LNSP to correct any incorrectly assigned Participants after the NMI was created. However MSATS does not permit the LNSP to perform the correction, instead only the FRMP or MC can do this under the new metering competition arrangement. We believe placing an obligation on the LNSP to perform an action when the system does not allow them to do is inappropriate. We note that the FRMP already have a similar obligation under clause 2.2.n but the MC does not have a similar obligation. We suggest that clause 2.3.p be deleted and a new clause be		

		created for the Current MC that is the same obligation as clause 2.2.n.		
2.4	METERING DATA PROVIDER	Procedural improvement: Following on from our feedback on clause 2.3.e, the current MDP should obtain the ADL from the retailer, or determine the ADL themselves given that they are the Current MDP. Due to the new metering competition arrangement we suggest that clause 2.4.m be reworded to: "Obtain the ADL from the FRMP or determine the ADL from *metering data* and enter the value into MSATS."		
2.4	METERING DATA PROVIDER	Procedural improvement: Clause 2.4.p should take into consideration clause 7.8.9.b of the NER which allows for type 5 and 6 meters to be read remotely. Also the note under table 4-13 should be included in this clause for completeness. To avoid confusion we suggest that clause 2.4.p be reworded to: "For *metering installations* that		

		are manually read update the Next Scheduled Read Date in MSATS within two *business days* of a *meter* being read. There is no requirement to maintain the Next Scheduled Read Date for meters that are read daily"		
2.6	MC	Procedural improvement: The reference to MPC in clause 2.6.b should be moved to 2.6.a because the MPC is a category of MDP and not MP.		
2.6	MC	We submitted comments in the initial consultation and have noted AEMO's response of 'AEMO needs to understand why there is a compelling case for this to occur' and wish to provide further feedback. The MC appoints the MP and MDP and should be responsible for ensuring that they communicate and work with each other. When there is any inconsistency in information between the MP and MDP we believe that the MC needs to ensure that the MP and MDP investigate and fix accordingly. Having the MC as the single point		

		of contact for any data discrepancies would provide for a more efficient process instead of contacting the MP and MDP individually because it would not be clear from the data discrepancies which party has the correct data. Procedural improvement: There should be a new obligation on the MC to ensure that the standing data used by the MP and MDP are correct and consistent. For example the Meter Serial ID populated in MSATS by the MP must be the same Meter Serial ID populated in the NEM12. We suggest a new clause 2.6.k as 'Ensure that the values for data fields defined in the NMI Standing Data Schedule is correct and used consistently when updating MSATS and in all communication including MDFF, MDM, B2B and notification of metering work.'		
2.10	EMBEDDED NETWORK MANAGER		Procedural improvement: The last sentence in clause 2.10.e should be a listed as a separate clause because it is not directly related to first sentence.	
3.1	OVERVIEW	Procedural improvement: The references listed at the end of		

		clause 3.1.j, 3.1.k and 3.1.l are incorrect. We suggest that this be corrected.		
3.3	TRANSACTION TYPES	Procedural improvement: The references listed at the end of clause 3.3.b and 3.3.c are incorrect. We suggest that this be corrected.		
3.4	CHANGE REQUESTS	Procedural improvement: The reference listed at the end of clause 3.4.j is incorrect. We suggest that this be corrected.		
3.5	CHANGE REQUEST STATUS LIFE CYCLE	Procedural improvement: The diagram in clause 3.5 is blurry. We suggest that a clearer diagram be inserted.		
3.6	TRANSACTION VALIDATION	Procedural improvement: We note that AEMO has agreed to include Controlled Load and Time Of Day as administered fields in MSATS. Consistent with AEMO's decision we suggest that Controlled Load and Time Of Day be added to 3.6.a.i for completeness.		
4.7	OBJECTION CODES	Procedural improvement: We do not agree that the MDP at a		

		Greenfield NMI can object to the LNSP updating the NMI status to 'A' before the MP has created the metering installation. This implies that the MDP can hold up the activation of the NMI until the MDP has set up their systems regardless of the physical status of the connection point. We believe that if the LNSP receives reliable information that the connection point is energised then the LNSP should be able to change the NMI Status to 'A' and not be held up due to the MDP not having their systems ready. We suggest deleting the last sentence in the description of the BADMETER objection code.		
4.10	END USER CLASSIFICATION	Procedural improvement: Clause 4.10.2.b should not include the NMI Status of 'R' due to AEMO's decision to no longer make the LNSP use a 'R' status. We suggest that the reference to 'R' be removed in this clause.		
4.11	STATUS CODES (NMI AND DATASTREAM)	Procedural improvement: Clause 4.11 includes obligations on the status code for the meter and		

		register. We suggest that the heading for clause 4.11 be updated to: "Status Codes (NMI, Datastream, Meter and Register)"		
4.11	STATUS CODES (NMI AND DATASTREAM)	Procedural improvement: Clause 4.11.3.b should include the status of 'D' in the sentence to align with table 4-10.		
4.11	STATUS CODES (NMI AND DATASTREAM)	Procedural improvement: The description of the code C in table 4-10 should be updated to highlight the difference with code D. We suggest rewording to: "Applies when a meter at the NMI is installed and not *remotely disconnected*."		
4.11	STATUS CODES (NMI AND DATASTREAM)	Procedural improvement: Clause 4.11.3.c is confusion because it allows for a DataStream Type of 'P' for sample meters, but the lead-in sentence does not mention the Metering Installation Type Codes of SAMPLE. We suggest removing references to 'P' in clause 4.11.3.c.i, and		

		inserting a new sub-clause of 4.11.3.e as follow: If the MeterInstallCode is SAMPLE: (i) DataStreamType must be P (ii) ProfileName must be NOPROF (iii) Suffix must be Nx (e.g. N1)		
4.14	FIELD VALIDATION RULES	Procedural improvement: The reference listed at the end of clause 4.14.a is incorrect. We suggest that this be corrected.		
4.14	FIELD VALIDATION RULES	Formatting error: The indent of clause 4.14.a is too far to the right. We suggest that this be corrected.		
4.16	Maintenance of Codes and Rules	Formatting error: The words 'Controlled Load Indicator' in clause 4.16.a is written in white text and hard to read. We suggest that this text be in black like the other text in the table.		
4.16	Maintenance of Codes and	Procedural improvement: We support the inclusion of the Time		

	Rules	of Day Codes and the Controlled Load Indicator as codes that AEMO will maintain. At the AEMO workshop on 7 July 2016 there was a suggestion that this change is a nice to have and is not mandatory for 1 December 2017. We believe that making these fields AEMO maintained codes from 1 December 2017 is necessary to ensure the market operates more smoothly when metering competition starts. It should be noted that currently the network is the LNSP and MP for a large volume of NMIs but this will change and there would be more reliance on defined data when communicating between market participants. Due to the closure of the Solar Bonus Scheme on 31 December 2016 there is an increase of interval meters installed in NSW over the last few months and the data that we are receiving shows that there is benefit in having defined data values. We do not expect the change to		

		have a significant cost to implement given that the fields are already mandatory and that MSATS already have the functionality to have maintain and validate against a list of codes for a particular field. However we see great benefit as it will allow participants to automate the setup of systems for receiving and loading the metering data.		
4.19	OBTAINING ELECTRONIC DOWNLOADS OF CONFIGURATION RULES	Procedural improvement: Table 4-16 could be improved as follow: In the second row, un-bold the word 'rule'. In the eight row replace 'DLF Code' with 'Distribution Loss Factor Codes'		
8.4	FRMP Requirements	Procedural improvement: The reference listed at the end of clause 8.4.h is incorrect. We suggest that this be corrected.		
8.6	MC Requirements	Procedural improvement: The reference listed at the end of clause 8.6 is incorrect. We suggest that this be corrected.		

14.3	INITIATION ROLES	Procedural improvement: The reference listed at the end of clause 14.3.d is incorrect. We suggest that this be corrected.		
15.3	Initating Roles	Procedural improvement: The reference listed at the end of clause 15.3 is incorrect. We suggest that this be corrected		
15.7	CHANGE REQUEST STATUS NOTIFICATION RULES	Procedural improvement: The reference listed at the end of clause 15.7 is incorrect. We suggest that this be corrected		
21.4	MDP Requirements	Procedural improvement: Clause 21.4.d suggests that the LNSP be the default party to obtain the ADL. Following from our feedback on clause 2.3.e, we believe that the MDP should obtain the ADL from the New FRMP via NMI Discovery Search 2. We would suggest that clause 21.4.d we reword to: “Determine the ADL from the metering data or obtain it from the New FRMP.”		
24.7	CHANGE REQUEST STATUS	We submitted comments in the initial consultation and have		

	NOTIFICATION RULES	noted AEMO's response of 'AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF' and wish to provide further feedback. AEMO have suggested that the LNSP could obtain the NSRD from the MDFF however when the NSRD is changed without changes to the metering data amendments the LNSP is not notified of the change in NSRD via the MDFF. An example scenario is when three months of forward estimated metering data is provided and the NSRD is changed to bring the NSRD forward by a week – in this scenario the NSRD will be updated in MSATS but the metering data may not change. In addition the MDFF states that 'The NSRD provided in this file is accurate at the time the file is generated (noting this may be subject to change e.g. if route change etc.). MSATS is the database of record, therefore, should there be a discrepancy between the NSRD Date in this		

		file, MSATS shall prevail.' Procedural improvement: The LNSP needs to be notified of these Change Requests because it is initiated by the Current MDP who may not be the LNSP. However consistent with current practice, the notification should only be provided if the Change Request was initiated by a MDP that is not affiliated with the LNSP or for a type 5 or 6 meter.		
30.	MAINTAIN NMI – MAKE NMI A CHILD NMI – SMALL OR LARGE		We submitted comments in the initial consultation and have noted AEMO's response and wish to provide further feedback. In the draft determination report AEMO stated that 'AEMO considers that a NMI should only be made extinct when it is abolished.' This we partially agree with – we wish to clarify that consistent with the current NMI Procedure we believe that 'if a connection point is abolished the NMI becomes extinct', note that the status of the connection point, and not the NMI, determines if the	

			NMI should be extinct. AEMO goes on to say that 'Moving the NMI from an LNSP network to an embedded network does not create a new connection point or abolish an existing connection point; it is the same connection point.' At the AEMO workshop on 7 July 2016 AEMO provided an example which was a shop within an existing shopping centre and explained that when the shop is converted to be within an embedded network the metering switchboard may not change when a new meter is installed just after the network connection point. AEMO was of the view that in this example the connection point did not change. Given the example provided by AEMO we agree that the metering installation has not changed but the connection point has changed. The term connection point is more than the physical network connection point as AEMO described in the example, it is defined in the NER as the agreed point of supply and is used in practice to delineate the boundary of responsibilities. In the example provide by AEMO the agreed point of supply has changed because the LNSP is no longer responsible for	

			the metering installation. It is the embedded network operator, as an exempted network service provider, who is now responsible for this metering installation. Procedural improvement: Allowing a market NMI to become a Child NMI would cause significant system and procedural issues because they have been designed to comply with clause 11.3 of National Metering Identifier Procedure which states (bold text added for emphasis): '**A NMI cannot be reassigned to another connection point. It is NOT acceptable to reallocate NMIs to accommodate** changes to IT systems, changes to assumed associations, changes to network tariffs and charges, **changes to LNSP boundaries** or because the LNSPs allocation system has changed. While a customer may change their elected FRMP, the NMI for a connection point remains constant throughout its market life. **If a connection point is abolished the NMI**	

			becomes extinct, and hence each NMI has a start date as well as an end date and associated change control. **Where a customer changes the physical location of the connection point a new NMI must be allocated. The "old" NMI is decommissioned on AEMO's Metering Register and the "new" NMI commissioned accordingly.'** For an existing market NMI to change to a Child NMI the physical location of the connection point is usually changed, and in all cases the agreed point of supply with the LNSP has changed. Therefore the current obligation and business practice of making the market NMI extinct and creating a new Child NMI should continue. AEMO suggested that when a NMI was to be made extinct then retrospectivity in MSATS would be disabled, however this is incorrect because it is still possible to make changes in MSATS for the period that the NMI is still active. Please refer to the test results at the	

			end of this document which demonstrates this. AEMO also stated that '… it was confirmed that all retailers, MDPs and MPs would have to accommodate complex and costly processes should a NMI need to be made extinct and a new NMI created'. However AEMO's proposal would also introduce complexity and cost for LNSPs, MDPs and MPs too. We would suggest that when a market connection point become a Child connection point the LNSP extinct the market NMI and the ENM create a new Child NMI if required.	
31.	CHANGE ROLE – CHANGE LNSP – SMALL OR LARGE		Procedural improvement: Following on from our feedback to clause 30 we would suggest that wording be included here to not allow the change of LNSP for the scenario of converting an existing market NMI to a Child NMI.	

43.3	Request a NMI Discovery Search	Procedural improvement: The reference listed at the end of clause 43.3.b is incorrect. We suggest that this be corrected		

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

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**
	Whole document	The feedback provided for the CATS Procedure would also apply to the equivalent sections and clauses in the WIGS Procedure		

8. 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**
3	REPORTS	We submitted the below comments in the initial consultation. AEMOs' response is 'Noted. AEMO notes does not consider a change is necessary.' We do not see the value of having a diagram that is blurry and do not consider the effort to provide clearer diagrams would be great given the diagrams are exactly the same as the current version and the current version is clear. We have repeated our comments below and request that clearer diagrams be provided. Procedural improvement: Diagrams 2 and 3 are blurry and should be updated with a clearer diagram.		

9. 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

10. 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
	Whole document	Procedural improvement: This document is harder to read and reference compare to the current version because of the inconsistent numbering of procedural obligations and lack of sub-clauses as a reference to each obligation. We suggest that all procedural obligations be referenced with a clause number – see the current version as an example.		
1.3	Related Documents	We submitted the below comments in the initial consultation. AEMOs' response is 'Accepted in part – MDFF to be added to the list', however the procedure was not updated as suggested. We have repeated our comments below and request the procedure be updated. Procedural improvement: The following documents should be		

		added: Meter Data File Format Specification NEM12 & NEM13, B2B Procedure		
2.3	Specific obligations for MDP - Category D	Procedural improvement: If AEMO accepts that a NMI for a connection point cannot be used for a child connection point then clause 2.3.i.ii would be redundant and should be removed to avoid any confusion.		
2.3	Specific obligations for MDP - Category D	Procedural improvement: clause 2.3.i should not restrict the MDP from deactivating datastreams when NMI without controlled load transfers from tier 2 to tier 1. This is a common business practice of some MDPs and it would be costly to change with no benefit to the industry. We suggest adding a new subclause of 2.3.j as: "The MDP may deactivate datastreams for a NMI where the *accumulated metering data* is not required for *settlements*."		
2.3	Specific obligations for MDP - Category D	We submitted the below comments in the initial consultation. We note		

		AEMOs' response and wish to provide further information. The current wording is ambiguous as it can be interpreted that the MDP only need to store the reactive energy and not process and deliver it. We believe that the intent is that the reactive energy should be processed and delivered with the active energy. We therefore believe that updating the clause accordingly would remove any doubt and confusion. Procedural improvement: The second last paragraph should make it clear that reactive energy must be processed and delivered. We suggest the following reword 'Where the *metering installation* includes the measurement of *reactive energy*, the MDP must store, validate, process and deliver this *metering data* with the respective *active energy* in the *metering data services database*.'		

3.7	Specific Metering Data processing requirements for Special Sites	We submitted the below comments in the initial consultation. We note AEMOs' response of 'The current procedure does not require LNSP approval. AEMO is happy to consider specific reasons from interested parties regarding the inclusion of the LNSP as a party. AEMO considers that the rule changes do not require change to these clauses.' and wish to provide further information. Historically Endeavour Energy was the MDP for the special sites that are within or on Endeavour Energy's network boundary. However with the introduction of metering competition Endeavour Energy has decided to not provide a contestable metering service. However as a LNSP Endeavour Energy should be a party to approve logical algorithms because if it is within or on our network boundary then we can provide valuable input to help ensure that correctness of the algorithm.		

		Procedural improvement: the LNSP should also be a party to approve algorithms for logical NMIs as it may impact the LNSP if it is done incorrectly. We suggest rewording to 'Each MDP must ensure that any algorithm in support of a logical NMI is accepted by the MC, LNSP, AEMO and FRMP before being used.'		
3.10	Delivery performance requirements for metering data	Formatting error: Clause 3.10 has two instances of sub-clause a), b) and c)		
5.1	Meter churn scenarios	Formatting error: Clause 5.1 has two instances of sub-clause a), b), c) and d)		

11. 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**
3.2	Storage, handling and transport	We submitted the below comments in the initial consultation. We note AEMOs' response and wish to provide further information. Procedural improvement: We suggest that the last paragraph in clause 3.2 be reworded to 'The MP must ensure that *meters*, *instrument transformers* and *network devices* are returned to their owner within 10 *business days* following removal from a *metering installation* if the asset owner indicated that they want their assets to be returned.' We have taken into account AEMO's response in the initial consultation and wish to provide more justification. Although the current clause does		

		not restrict parties from agreeing to not return the equipment, it does define the default arrangement which is to return the equipment. AEMO also stated that there are appropriate incentives on all parties to ensure an efficient process for return and disposal is agreed. However in the absence of an agreement the default defined by AEMO is to return the equipment. This means that by default the owner of the asset bears the responsibility and cost for the disposal. Moving forward there will be a large volume of type 5 and 6 metering equipment that will be removed which are not economical to refurbish and would require disposal. We believe that the party who removed the equipment should be responsible for the disposal if the asset owner does not want the equipment returned. This is to ensure that disposal costs are not cross subsidised by customers who have exercised their choice to not have smart meters. By defining explicit obligation on the disposal, as opposed to relying on agreements, we believe that this would deliver		

		better outcomes for customers.		
4	Installation and commissioning requirements	We submitted the below comments in the initial consultation. We note AEMOs' response of and wish to provide further information. It is common industry practice that the MP de-energises the metering installation before performing any meter changes. Therefore we believe that it is appropriate that any obligations related to de-energising the metering installation for meter changes are in the SLP for MPs. Procedural improvement: This section should include obligations on managing a shared isolation point scenario. We suggest a new clause: 'The MP must determine the isolation point that will only de-energise the *metering installation* that they intend to work on. If such an isolation point cannot be determined then the MP must stop work and inform the MC'. Shared isolation points are more common with small customers		

		therefore defining the procedure for managing this scenario would help to minimise negative customer experiences.		
4.3	Notifications following Metering Installation Commissioning	We submitted the below comments in the initial consultation. We note AEMOs' response of and wish to provide further information. There is a risk that the notification is not implemented in the B2B/SMP from 1 December 2017. Therefore current business practice should continue where MP must provide the notification as per the LNSP's requirements. Procedural improvement: The content and format for the notification to the LNSP should be defined in a B2B procedure. In the absence of such a B2B Procedure then the existing industry practice should be maintained to minimise cost. We suggest rewording clause 4.3.b to: "Notice of completed metering installation work is sent to the LNSP within 2 business days of completion of the installation.		

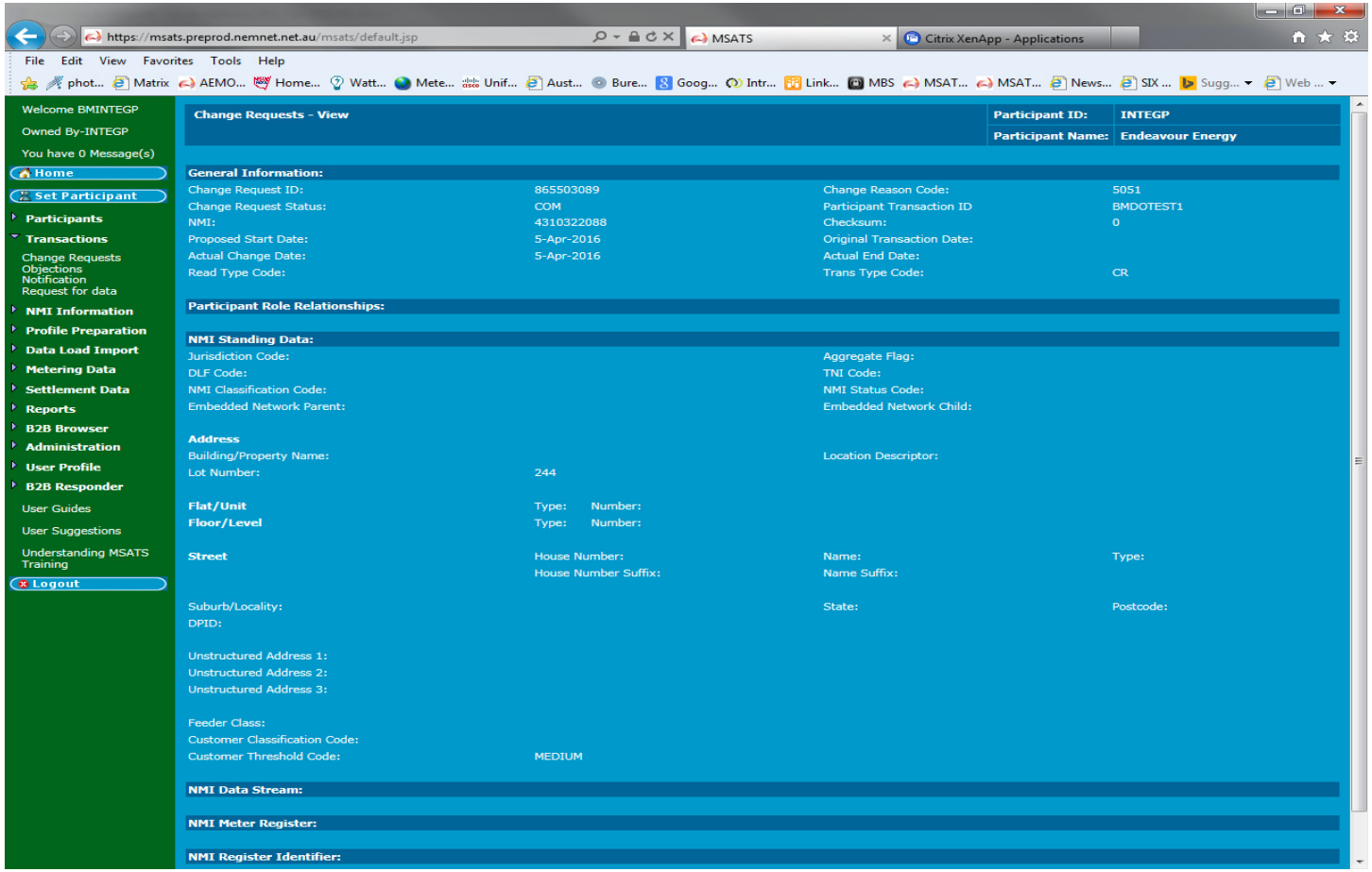
		The content and format must be provided as per the B2B Procedures. If the content and format is not defined in a B2B Procedure then the content and formats must be provided as per the LNSP's requirements." We would also suggest that table 1 be reworded as 'example content requirements'.		
4.4	Meter Churn			We submitted the below comments in the initial consultation. We note AEMOs' response of 'The NER does not allow a 'New MC' to authorise Meter Churn' and wish to provide further information. Consider the scenario when a type 6 is to be removed and a type 4 is to be installed. While the NMI is a type 6 the MC would be the LNSP. Based on the current clause and AEMO's response the MP is not allowed to change the meter unless the LNSP, as the current MC, authorised the MP to do so. However the LNSP has no direct relationship with the contract between the retailer, MC and MP. What should happen is that the

				retailer would have engaged a contestable MC, who would then appoint a MP to perform the meter change. The retailer would need to raise a Change Request in MSATS to nominate the change in MC and MP. While the MC and MP are nominated in the Change Request the MP would then be allowed to change the meter. Once the meter is installed the MDP can then complete the Change Request by submitting the Actual Change Date. Procedural improvement: An MP may perform meter churn when authorised by a New MC. We suggest rewording the lead-in paragraph to 'An MP must only undertake Meter Churn when authorised to do so by: a) the Current MC where the MP is the Current MPB; b) the Current MC where the MP is the New MPB and the Change Request has passed the objection logging period in accordance with the MSATS Procedures; c) the New MC where the MP is the Current MPB

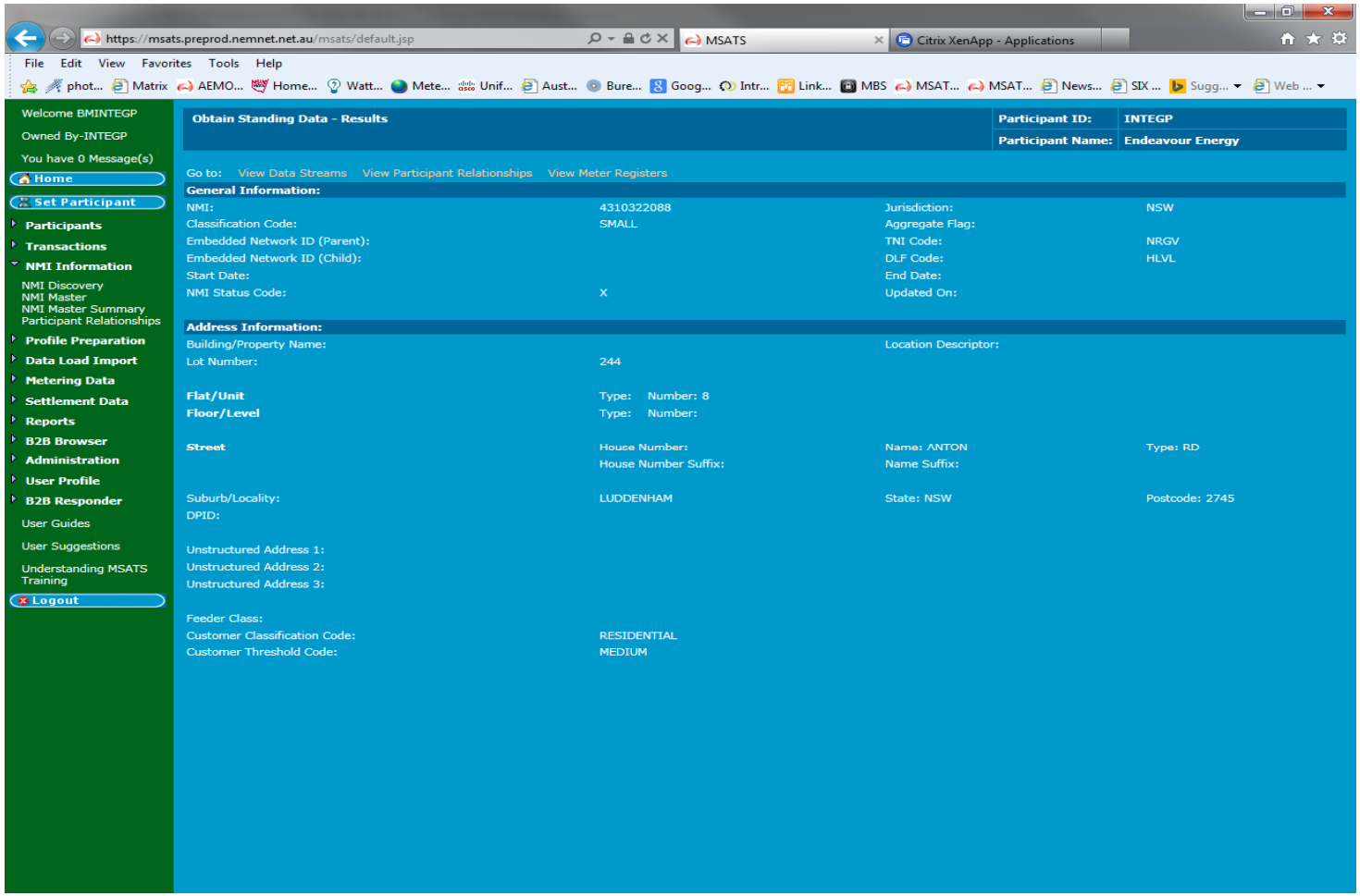
				and the Change Request has passed the objection logging period in accordance with the MSATS Procedures; or d) the New MC where the MP is the new MPB and the Change Request has passed the objection logging period in accordance with the MSATS Procedures'

12. Other Issues Related to Consultation Subject Matter

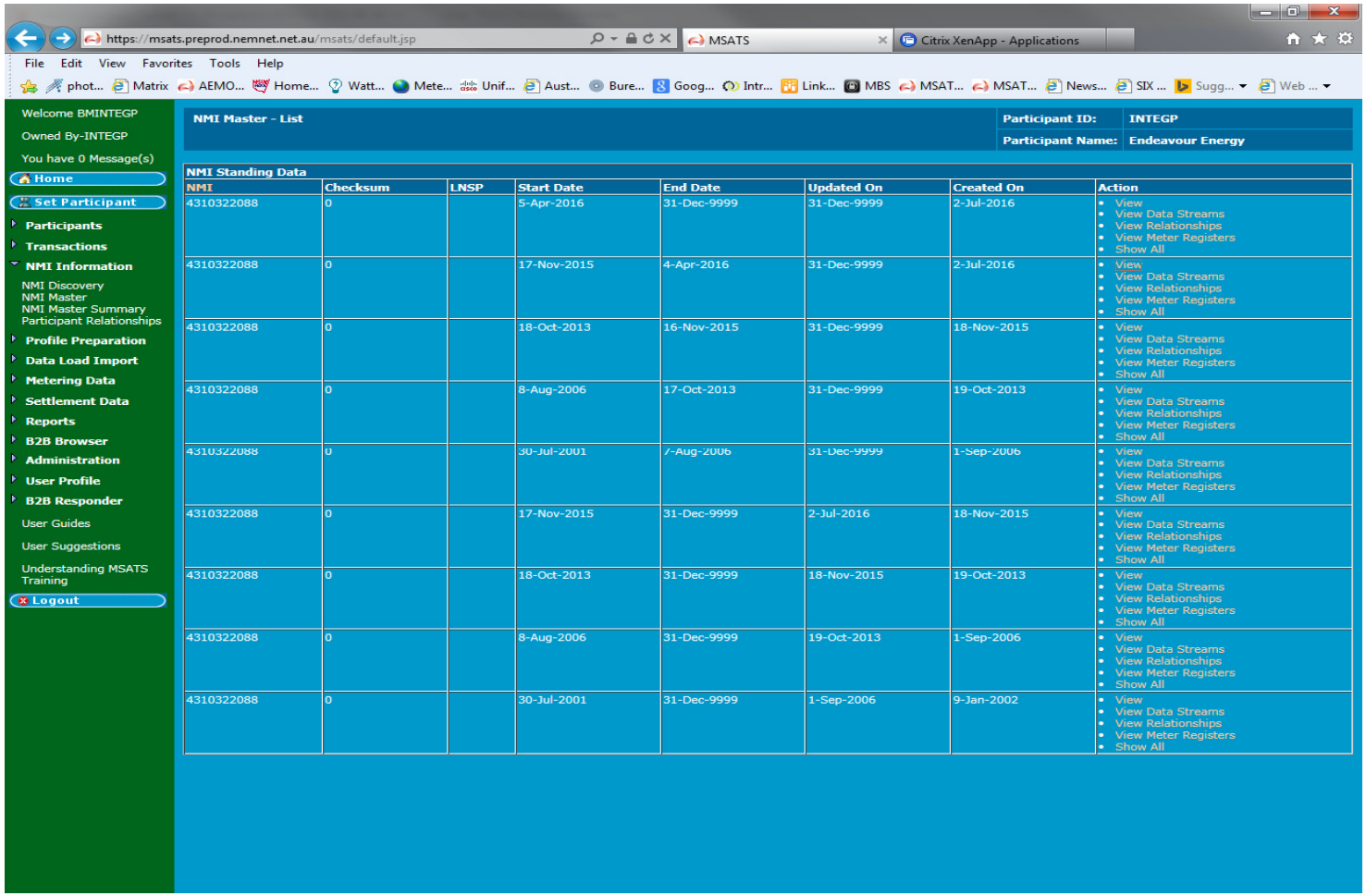
Document	Clause	Heading	Participant Comments
CATS Procedure	**30**	MAINTAIN NMI – MAKE NMI A CHILD NMI – SMALL OR LARGE	Please find below test results from the MSATS pre-prod environment showing that retrospective changes can be made for an extinct NMI.



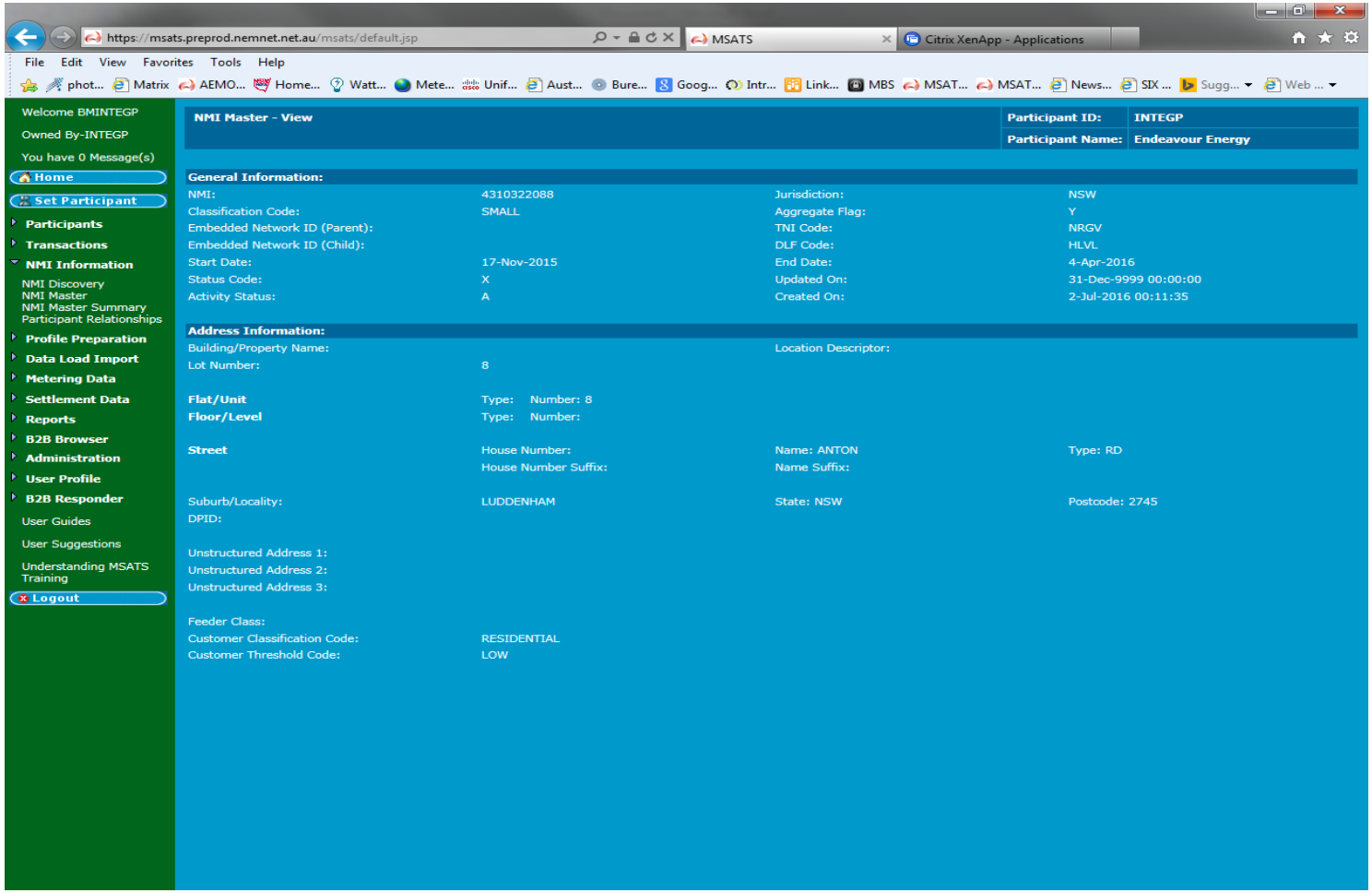
The standing data updated in this transaction was the add lot number to the address and the Customer Threshold Code was changed to Medium.



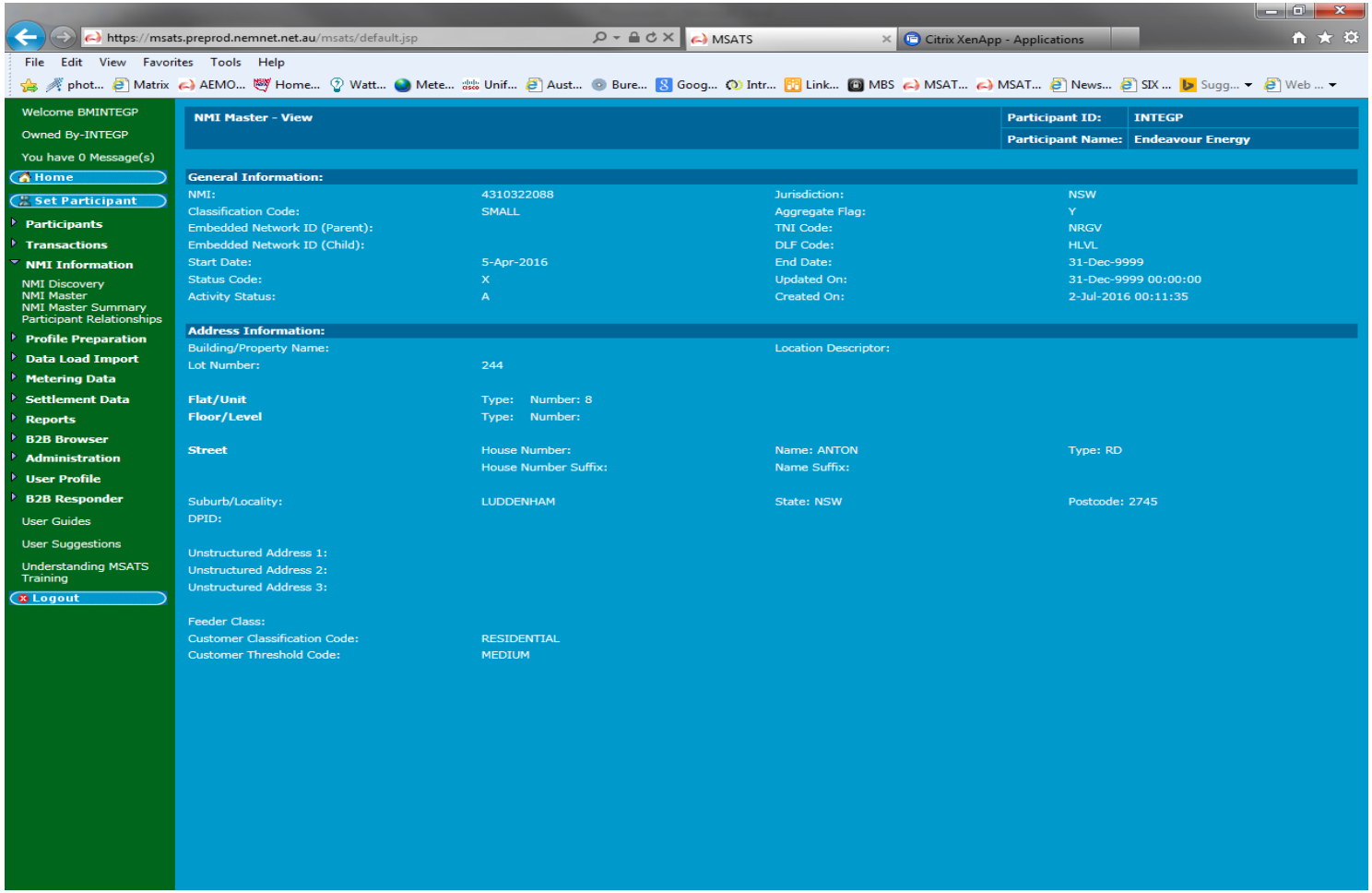
NMI Discovery shows updated data.



NMI master list shows new record created on 2/7



NMI master view (end date 4/4/16) shows previous standing data set.



NMI master view (start date 5/4/16) shows updated standing data.