METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Pacific Hydro*

Completion Date: *20 July 2016*

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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**
1.1	Purpose and Scope	Suggested changes below: This document is provided to assist users of the Retail Electricity Market Procedures in understanding the overall framework within which the Procedures operate and also contains a dictionary of terms used in the Retail Electricity Market Procedures. This document forms part of each of the Retail Electricity Market Procedures and will be amended in accordance with the process applicable to the relevant Retail Electricity Market Procedure. The table below identifies the Retail Market Procedures established, managed and published by AEMO. It also provides the relevant National Electricity Rules (NER) reference which applies to each of the Procedures. Whilst the B2B Procedures are part of the Retail Electricity Market Procedures, they are established and maintained by the Information Exchange Committee (IEC) in accordance with 7.17.7 of the NER. Consequently the Glossary and Principles provided in the sections below do not apply to the B2B Procedures.		
1.2.1	Glossary	Suggested changes below: Capitalised words, phrases and abbreviations set out in Chapter 3 have the meanings set out opposite them when used in this document and the Retail Electricity Market Procedures. Italicised terms used in the Retail Electricity Market Procedures have the same meanings given to those terms in the NER unless otherwise specified. **1.2.2 Interpretation**		

		The following principles of interpretation apply to the Retail Electricity Market Procedures unless expressly indicated otherwise: (a) This document and the Retail Electricity Market Procedures are subject to the principles of interpretation set out in Schedule 2 of the *National Electricity Law*. (b) The National Electricity Rules (**NER**) prevails over this document and the Retail Electricity Market Procedures to the extent of any inconsistency. (c) References to time are references to *Eastern Standard Time*. (d) Diagrams are provided as an overview. In case of ambiguity between a diagram and the text of this document, the text will prevail over any diagram.

2. Meter Data File Format

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

3. Metrology Procedure: Part A

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Clause	Heading	Participant Comments		
		Metering Competition	**Embedded Networks**	**Meter Replacement Processes**
3.1	Overall requirements	Suggest the following change: Change the section heading to 'Responsibility for Meter Provision MC and MP' These are the only two roles referenced in 3.1		
4.6	Grandfathering	It is suggested VICAMI meters be 'grandfathered' as of 1 December 2017 given they are currently identifiable in MSATS and that post 1 December 2017 any VICAMI meters must be exchanged for an advanced meter.		
4.10	Alarm Meters	It would appear across the MSATS procedures there are discrepancies as to the meter alarms. It is suggested all references to meter alarms be reviewed for consistency. Refer to 7.2 Metrology Procedure Type B and MDFF Apendix E.		

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**
1.3.	Related Documents	Is this the complete list of related documents?		
2.4.	Metering data quality flags	Provide a Heading number for 'Final Substitution'.		
9.1.	Validation of metering installations with remote acquisition of metering data	Clauses (c), (d) and (e) have now been deleted; why?		
9.2.	Validation for manually read interval metering installations	Clauses (d) and (e) have now been deleted; why?		

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**
2.1	GENERAL OBLIGATIONS	Suggest the following rewording: (e) A ~~CATS~~ Participant must ~~not~~ select ~~an~~ the Objection Code which applies to the reason for objection and must be able to produce evidence, upon request, to substantiate the use of an Objection Code. ~~unless the Objection is fair and reasonable.~~		
2.2	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	With regard to clause (r), the New FRMP, as part of the transfer process for a move-in transfer, can send a service order to remotely re-energise the site. Therefore an obligation should be placed on the New FRMP to inform the LNSP.		
3.1	OVERVIEW	Suggest the Following: A Change Request is Completed the day after the Objection Logging Period has ended, no Objections exist and an Actual Change Date has been provided by the MDP. Where an Objection has been received the Change request is Completed the day after all Objections have been withdrawn and there is an Actual Change Date provided by the MDP. The change is effective from the Actual Change Date.		
4.7	OBJECTION CODES	BADPARTY – MP is not a role in MSATS. Suggest this be replaced with MPB and MPC. DEBT – suggest the previous wording provided as Jurisdictions' objection for debt guidelines are not just a monetary limit.		
4.12	METERING INSTALLATION	VICAMI meters are currently identified in the market as MRIM with a Read Type Code of RWD.		

	TYPE CODES	Instead of changing to a VICAMI Metering Installation Type, VICAMI meters could be 'grandfathered' under the existing definition as at 1 December 2017. Any subsequent removal of a VICAMI meter would be installed as COMMS4C, COMMS4D or MRAM. This would reduce the amount of change and pre-cutover effort for impacted participants.
4.16	MAINTENANCE OF CODES AND RULES	Inclusion of Controlled Load Indicator and Time of Day in the table. Is this change PoC related? If not, what is the rationale for making this change at this time? Suggest this be deferred to another implementation if not PoC related.
7.	AEMO BULK CHANGE TOOL	7.7 Timeframe Rules It is strongly suggested the objection logging period remain at 5 days. Reducing it to one day, with an influx of new market MC entrants whose systems may not be to the level of sophistication as some participants and who may be relying on manual processes, will only lead to error and rework across the market.
11.1	APPLICATION [1500]	Suggest the following: The MDP is required to provide MSATS with the Actual Change Date that specifies the date on which the requested change takes effect in MSATS.
27.5	TIMEFRAME RULES	The current MDP can object according to Table 24.6 but in Table 24.5, there are zero days to lodge the objection.

6. MSATS Procedures: MDM Procedures

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Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes

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

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Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes

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

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Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes

9. NMI Standing Data Schedule

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Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes

10. Service Level Procedures for MDP

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Clause	Heading	Participant Comments		
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6.1	Metering Data Archival and Recovery	Suggest the following: The ~~*Metering Data* Provider~~ MDP must have retrieval mechanisms that allows the ~~archived~~ *metering data* (~~both that~~ which is available online ~~and~~ or archived) retained in its metering data services database under clause 7.10.2 of the NER to be accessed**,** recovered, re-evaluated and delivered in agreed timeframes to AEMO and *Registered Participants*.		

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

12. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments
Glossary and Framework			It is expected this document will be subject to consultation as with other MSATS Procedures.
CATS Procedures			The LNSP, as the owner of the network tariff code, should be responsible for updating the network tariff code in MSATS. A process needs to be developed and documented within the Procedures that define how the LNSP will be advised of the metering configuration which will then allow them to update MSATS with the network tariff code within a specified timeframe. Obligation would also need to be placed on those participants responsible for advising the LNSP of the meter configuration.
CATS Procedures			There is a need for the type of de-energisation used at the site to be available in MSATS through NMI discovery as this will determine how the retailer re-energises the site. The responsibility for updating the fields, De-en Type and De-en Date could be added to the 5050/5051 and the De-en type could be a single alpha to identify the type of de-en e.g. R= Remote, F= Fuse Removed etc. The roles responsible for updating the fields would be either the LNSP or MDP.
CATS Procedures			There are two new entities in the market; ENM and MC. As these are not being recognised in MSATS i.e. the MC is taking on the RP role and the ENM is taking the LNSP role, these need to be stated clearly in section 2

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			under their obligations. There needs to be a clear link between the Rules obligations of the parties and the obligations which are placed on the roles they are adopting in the Procedures. For example the distributor may have an obligation in the Rules to update the customer threshold but does the ENM have that same obligation in the Procedures?
General			At the PoC-PWG meeting on 7 July 2016 the ability to identify the ENM at the Parent NMI was discussed and it had been suggested the NSP2 role be used for this purpose and available through NMI discovery. AEMO advised this was not possible and that AEMO would manage and make available to participants a list of ENMs. This appears a cumbersome process and issues with timely updates and accuracy are of concern. It is suggested that the use of the NSP2 role be reviewed or an alternative sought.
General			At the PoC meeting on 7 July 2016, the need for a Procedure for managing Embedded Networks was discussed. Given the disparate processes and guidelines which currently exist across the NEM for the management of Embedded Networks, together with the changes brought about by PoC, the development of a single Procedure is required.
General			As per the meeting on 7 July 2016 the new value of 'D' for remote disconnection will be added to the existing Meter Register Status field at the meter level. The existing 'D' NMI status will remain and refer to the physical de-energisation of the site. Whilst this is generally agreed there are issues concerning how the two fields will operate. What is the

Document	Clause	Heading	Participant Comments
			connection between NMI Status and the Meter Register Status? If there are three meters at the site and only two can be remotely de-energised what happens to the NMI status? This also raises issues relating to network billing which will need to be addressed. If network billing is driven by the NMI status and it remains 'A', Active, even though all or some of the meters associated with the NMI have been remotely de-energised, how will this be managed?