METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Select Solutions*

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1. Glossary and Framework

Please delete any rows where there are no particpant comments

(note: only sections that have changed as part of Work package 2 are listed in the table below)

Clause	Heading	Participant Comments
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2.2	Structure of Retail Electricity Market Procedures	
2.3	Metrology Procedure	
2.5.5	NMI Procedure	
2.7	Qualification Procedure	
2.8	Metering Service Level Procedures	
2.9	Service Level Procedure for Embedded Network Managers	
2.10	Default & Deregistration Procedure	

2.11	Exemptions	
3	Glossary Term: Default and Deregistration Procedure	
3	Glossary Term: Exemption Guideline	
3	Glossary Term: Exemption Procedure	
3	Glossary Term: HV	
3	Glossary Term: LV	
3	Glossary Term: MDM Contributory Suffix	
3	Glossary Term: Meter Register Status Code	
3	Glossary Term: MSATS Procedures	
3	Glossary Term: NMI Procedure	
3	Glossary Term: Qualification Procedure	
3	Glossary Term: Service Level Procedure (ENM)	
3	Glossary Term: Unmetered Load Guideline	

2. Default & Deregistration Procedure (MP, MDP, ENM, MC)

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
1	Introduction	
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	BREACH OF THE NER OR PROCEDURES UNDER THE NER	
3	DETERMINATION OF TYPE OF BREACH	
3.1	Immaterial Breach	
3.2	Significant Breach	Suggest re wording to better differentiate a significant breach from a material breach. There currently is no difference between the definition listed in 3.2 as opposed to a Material breach listed in 3.3 (a). This could lead to confusion in relation to the issue of

		notice of breach
3.3	Material Breach	Refer above
4	ISSUE OF BREACH NOTICE	
5	REVIEW OF CAPABILITY FOR ONGOING COMPLIANCE	
5.1	Remediation Plan	
5.2	Past Conduct	
5.3	Organisation Structure	
5.4	Other Relevant Considerations	
6	AEMO ACTION FOLLOWING REVIEW	
6.1	Material Breach	
6.1.1	MP, MDP, or ENM	
6.1.2	MC	
6.2	Non-Material Breach	
6.2.1	Actions taken by AEMO	

6.2.2	Warnings	
6.2.3	Escalation	
7	EXERCISE OF AEMO DISCRETION	
7.1	Relevant Considerations	
7.2	Constraints	
8	CONSEQUENCES OF AEMO ACTION	
8.1	MP, MDP or ENM	
8.1.1	Material Breach	
8.1.2	Non-Material Breach	
8.2	MC	
8.3	Other Impacts	
9	VOLUNTARY DEREGISTRATION	
9.1	Application	

9.1.1	Embedded Network Manager	
9.1.2	Metering Providers and Metering Data Providers	
9.1.3	Metering Coordinators	
9.2	Process	
9.2.1	All Applicatns	
9.2.2	Embedded Network Managers	
9.2.3	AEMO Review of Application	Perhaps consideration should be given to the particular notification or process or advice that should occur or be given to the affected party once the breach no longer exists, or as part of the remediation plan, the breach has been resolved
APPENDIX A	NOTICE OF BREACH	
APPENDIX B	METERING COORDINATOR DEFAULT NOTICE	
APPENDIX C	NOTICE TO APPOINTERS	
APPENDIX D	OUTCOME OF REVIEW	

APPENDIX E	NOTICE TO AFFECTED PARTIES	

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
1	INTRODUCTION	Is there a definition of what constitutes a meter malfunction that could be included into the introduction? There is no longer a mention of rectification of discrepancies with the meter register and actions in respect of metering transformers installed prior to 13 December 1998? Where are these captured in respect of meter malfunctions that may or may not require exemptions?
1.1	Purpose and Scope	What happens in Victoria to Type 5 “AMI” remote read meters where the LNSP is the deemed MC? Should there be mention of the LNSP as the deemed MC in the scope? If an AMI type meter installed in Victoria is found be faulty and requires replacement, is the LNSP responsible for notifying the FRMP or for applying to AEMO for an exemption? Is the “deemed” MC excused from using the exemption process as compared to a newly “appointed” MC?.
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	APPLICATION PROCESS	

2.1	Applicant	
2.2	Timing of Application	
2.3	AEMO's Determination	
2.4	Matters taken into Consideration	
2.5	Grant of Exemption	Part (a) refers to the MC providing a rectification plan however 7.8.10 (c) of the NER suggest that tis should be provided by the MP and section 3 of this procedure suggest that the MC may provide a draft of this plan with its exemption. Perhaps clarity on when an exemption plan is required and who is responsible to provide the plan, (whether MC, MP or ENO or LNSP?)
2.6	Application Unsuccessful	
2.7	Extension to Exemption	
2.8	Current MC's Obligations during the Exemption Period	
2.9	Expiry of Exemption	
3	RECTIFICATION PLAN	
3.1	Timing	

3.2	Contents	
APPENDIX A	APPLICATION FOR EXEMPTION	
APPENDIX B	APPLICATION FOR EXTENSION	

4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
1	INTRODUCTION	
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	ALLOCATION AND ISSUE OF NMIS	Pg 10. If an End User changes the physical location of the *connection point,* a new *NMI* must be allocated to the new *connection point.* The "old" *NMI* will be recorded as de-commissioned on *metering register* and the "new" *NMI* will be allocated accordingly. Question. If the location *physically* changes, should the clause stipulate that the old NMI be updated to "abolished" as the physical supply point is no longer available?
2.1	NMI Allocation by AEMO	
2.2	Issue of NMIs by LNSPs and ENMs	
3	NMI STRUCTURE	

4	NMI REGISTERS	
5	NMI CHECKSUM	
6	DATASTREAM SUFFIX	
7	DATASTREAM SUFFIX FOR INTERVAL METERING DATA	
7.1	Datastream Suffix for Accumulated Metering Data	
7.2	Wholesale Connection Points	
8	CONNECTION POINTS WITH TYPE 1 METERING	
9	CONNECTION POINTS WITH TYPE 2 METERING	
10	NMI RULES	
10.1	Data Delivery to AEMO (MSATS System)	
11	UTILISATION OF NMI FOR AEMO DATA	
11.1	Data Delivery to AEMO (MSATS System)	
12	EXAMPLES OF NMI APPLICATION – INTERVAL	

	METERING DATA	
12.1	One End User metered on the secondary side of transformer	
12.2	One End User, multiple metered on the secondary side of transformer	
12.3	One End User, previously two tariff metering, eg general supply & off-peak on secondary side of transformer	
12.4	One End User, two controlled loads, one twin element meter	
12.5	One End User, two twin element meters	
12.6	One End User, multiple meters on secondary side of multiple transformers in the same substation building and LV switchboard in common switchroom	
12.7	Three End Users, metered on secondary side of multiple transformers in the same substation building	
12.8	One End User, two separate HV supplies to two separate substations, both metered on secondary side of the transformers	

12.9	One End User, two separate substations adjacent to each other or one single substation with two separate transformers in a single substation, with a “normally open” point separating the HV supplies into two sources	
12.10	One End User, two separate substations adjacent to each other or one single substation with two separate transformers, with the HV supply originating from a single source	
12.11	One End User, two separate substations not adjacent to each other but on same premises	
12.12	Multiple End Users, High rise building	
12.13	One End User with multiple supply points	
12.14	One End User with Standby Supply	
12.15	One End User or Participant, Wholesale Metering at Transmission Node	
12.16	One End User or Participant, Wholesale Metering at Transmission Node	
12.17	One End User, Wholesale Metering at Transmission Node	

12.18	Street Lighting (Type 7 Metering Installation)	
13	EXAMPLES OF NMI APPLICATION – ACCUMULATED ENERGY DATA	
13.1	Single Meter with Single Datastream	
13.2	Two Meters each with Single Datastream	
13.3	Two Meter Installation, One Meter Recording Consumption for a Controlled Load	
13.4	Three Datastream Meter with Single Measurement Element	
13.5	Multi-function Meter	
13.6	Two Multi-function Meters	
14	ENERGY DIRECTION FLOWS	
15	ALLOCATION OF NMIS FOR TYPE 7 METERING INSTALLATIONS	
15.1	Common Requirements across the NEM	
APPENDIX A	SAMPLE JAVA CODE FOR NMI CHECKSUM	

APPENDIX B	EXAMPLES	

5. Qualification Procedure

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
1	INTRODUCTION	Should there be reference to how an MC can become qualified, accredated or registered?
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	PREPARATION	
2.1	Mandatory Requirement	
2.2	Pre-Reading	
2.3	Pre-Application Meetings	
3	QUALIFICATION PROCESS	Is there a view that existing accredated MPs for Type 4, 5 and 6 need to apply to be Type 4A meter providers? Section 2.3 (b) requires clarity around the “abridged” guideline

3.1	Application	When is it likely that the website to illustrate how applicants should respond be available?
3.2	Accreditation Checklists	
3.3	Application Fees	
3.4	Queuing Policy	
3.5	Review for Completeness	
3.5.1	Inadequate Responses or Missing Information	
3.5.2	Application in Abeyance	
3.6	Pre-Production Assessment	
3.6.1	General	There does not appear to be a guideing timeline for AEMO to asses or approve applications for accreditation. An overview of activity and timeline may be beneficial so MPs can form a view of how long an accreditation process could take.
3.6.2	MarketNet	Is it assumed that MarketNet, MSATs and B2B hub is a requirement and pre re-quisite for any MPB Registration (not just specifically for Type 4A)
3.6.3	MSATS	
3.6.4	Applicant System Testing	

3.6.5	Test Results	
3.7	Independent Review	
3.7.1	On-Site Risk-Based Review	
3.8	Final Accreditation Review	
3.9	Completion of Review	
3.9.1	AEMO Accredits and Registers Applicant	
3.9.2	Application not Successful	
4	MAINTENANCE OF ACCREDITATION AND REGISTRATION	
5	RE-ACCREDITATION AND REGISTRATION	
APPENDIX A	APPLICATION FORM	

6. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
1	INTRODUCTION	
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	OBLIGATIONS	
2.1	Embedded Network Management Services	Who is responsible to supply metering transformers for an on market EN connection point? Is it the LNSP or ENM?
2.2	Use of Sub-Contractors	
2.3	Insurance	
3	SYSTEMS AND ADMINISTRATION	

3.1	Systems and Interface Requirements	
3.2	Embedded Network Information	
3.3	Audits Undertaken by AEMO	
3.3.1	ENM to Assist	
3.3.2	Timing of Audits	
3.3.3	Notice of Audit	
3.4	Other Audits	
3.5	Review of Accreditation	
3.6	Disputes	
4	MARKET INTERFACE FUNCTIONS	
4.1	NMI Allocation	
4.2	Distribution Loss Factors and Transmission Node Identity	
4.2.1	Site specific DLF	

4.2.2	Small load DLF	
4.2.3	TNI	
4.3	MSATS Setup	
4.3.1	Market Exit	
4.3.2	Resumption as Child Connection Point	
4.3.3	Physical Rewiring to Join an Embedded Network	
4.3.4	Network Tariff Code Update	
5	DELIVERY OF INFORMATION UPON DEREGISTRATION	

7. Unmetered Load Guideline

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
1	INTRODUCTION	
1.1	Purpose and Scope	
1.2	Definitions and Interpretation	
1.3	Related AEMO Documents	
2	APPLICATION PROCESS	
2.1	The process	
2.2	The Outcome	
3	DISCLAIMER	
4	MATERIAL TO SUPPORT APPLICATION	
4.1	Generally	

4.2	Determination of a Single Unmetered Device Load Value for Controlled Unmetered Devices	
4.3	Determination of Annual Energy Consumption for Uncontrolled Unmetered Devices	
4.4	Load value	
4.5	Control Equipment	
4.6	Sampling for LED devices	

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments
Metrology Procedures Part A		Metering Installations	Is there a view that under PoC that LNSPs will no longer supply metering transformers and therefore in Victoria at least, that these will no longer be cost recovered via Network charges? That is will MCs or MPs be providing that service in Victoria