METERING COMPETITION EMBEDDED NETWORKS METER REPLACEMENT PROCESSES

POC PROCEDURES CONSULTATION (PACKAGE 2)

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Secure Meters

Completion Date: 17/1/2017

Table of Contents

1.	Glossary and Framework	3
2.	Default & Deregistration Procedure (MP, MDP, ENM, MC)	3
3.	Exemption Procedure (Metering Installation Malfunctions)	3
4.	MSATS Procedures: National Metering Identifier	4
5.	Qualification Procedure	4
6.	Service Level Procedure – Embedded Network Manager	5
7.	Unmetered Load Guideline	6
8.	Other Issues Related to Consultation Subject Matter	6

1. Glossary and Framework

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Clause	Heading	Participant Comments
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2. Default & Deregistration Procedure (MP, MDP, ENM, MC)

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3. Exemption Procedure (Metering Installation Malfunctions)

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4. MSATS Procedures: National Metering Identifier

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Clause	Heading	Participant Comments	
2.2	Issue of NMIs by LNSPs and ENMs	(a) The wording of the 1 st sentence states "For each new connection point, or child connection Point" suggest adding new NMI prior to child connection point otherwise every child connection point and not just new sites.	
3	NMI STRUCTURE	Clause (a) should be – The <i>NMI</i> is a ten (10) character identifier. The key attributes of a NMI are: reason takes greyness out of the statement and following clauses do not contradict. Clause (iv) totally contradicts clause (iii), hence needs – with the exception of NMIs allocated under clause (iii)	

5. Qualification Procedure

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6. Service Level Procedure – Embedded Network Manager

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Clause	Heading	Participant Comments
3.4	Other Audits	In (a) it states that a registered participant can request an audit, what about an accredited participant or end use customer?
4.1	NMI Allocation	The change from referencing the MSATS procedures to naming the CRs # will require this procedure to change if there is a change to the MSATS procedures.
4.2.1	Overview	The statement made in (b) is in conflict with the Embedded Network Guide clause "3", where the DLF of a child NMI is back to the parent NMI and to calculate the actual DLF back to transmission point for a child NMI is Parent DLF X Child DLF and that unless the emdedded network DLFs are determined and published the value of the child DLF should set to 1.0 The Overview could be reduced to, Unless there are significant losses between the Parent NMI and a Child NMI the DLF code for a child should be equal to 1.0
4.2.2	Site specific DLF	A site specific DLF for a child should be to account for any additional losses from the Parent NMI to the Child Connection Point remembering the settlement of a Child NMI to the TNI is calculated by Child Meter Reading X Child DLF X Parent DLF hence if the Child DLF is calculated back to the TNI the figure will be incorrect for settlement.
4.2.3	Small load DLF	If the Child NMI has the same DLF code as the parent this will mean the calculation of the Child DLF to the TNI will be Parent DLF x Child DLF and unless the Parent DLF is any other than 1 will cause problems in settlement.

Clause	Heading	Participant Comments	
4.3.1	Market Exit	If the NMI exits a DNSP it is abolished why should when a NMI exits a Embedded Network shouldn't the NMI be abolished	
4.3.2	Resumption as Child Connection Point	If a NMI is returning to the market the connection should be treated as a New Connection	

7. Unmetered Load Guideline

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Clause	Heading	Participant Comments
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8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments
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