METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Aurora Energy*

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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	General comment - Needs to advise when not stated as a Business days or calendar days that the reader assumes calendar days e.g. "DEFAULT & DEREGISTRATION PROCEDURE 9.2.3 AEMO Review of Application states Provided an application is received at least 30 days prior to a proposed date" will indicate calendar days. 1.2.2(c) is EST 'Australian' EST ` Note changes required for B2B – there are times and periods in the B2B procedures which are in local time not AEST In regards to B2B procedures, the terms and definitions may now also relate to or be defined by the NERR, not just the NER
1.3	Related AEMO Documents	Unsure why the WIGS and CATS procedures have been removed? Is this because they are both covered by the MSATS procedure? Should the New MSATS NMI procedure be included in here?
2.4	B2B Procedures	May need to review the list of B2B procedures and documents following the B2B consultaions
3	Glossary term: Accreditation Checklists	Needs to now include ENM/MC?

3	Glossary Term: HV	There is reference to Low voltage being less than 1000v but no reference to HV being greater than 1000v Aurora Energy would like to recommend "*High Voltage – A voltage greater than 1000v"*
3	Glossary Term: LV	Suggestion - *Low Voltage – a voltage equal to or less than 1000 v*
3	Glossary Term: Meter Register Status Code	It is noted the term, however, the definitions contained within 4.11.3 (table 4-j) of the MSATS procedures CATS does not cater for a type 4A meter which has the contactors manually opened – not remotely opened.

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

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
1.3	Related AEMO Documents	Unable to open the Glossary by following the link, other links do not work i.e. service level procedures
3	DETERMINATION OF TYPE OF BREACH	Warnings need to be defined as well
3.1	Immaterial Breach	This section discussed the impact of a breach, but does not specify the framework for assessing how other participants' obligations may be affected causing them to be in breach. While this process is created under the NER a number of Participant obligations

		affecting their service and which will stem from this breach arise from the NERR
3.2	Significant Breach	As per 3.1
3.3	Material Breach	As per 3.1
4	ISSUE OF BREACH NOTICE	It is noted that the Local Retailer (LR) is not identified as a party to be notified in this procedure. See 8.1.1 There would be various incidents when the LR should be notified of any breaching - materially or significantly. The procedure is unclear in regards to the issuance of a material / significant breach notices. As a matter of course, the contracting parties should also be advised of a breach so as to mitigate any impact to their operations.
5	REVIEW OF CAPABILITY FOR ONGOING COMPLIANCE	Notice of Breach within 7 days after the issue of the notice; is this actual days or Business days? Perhaps should state 7 Calendar days but would be more consistent if this be changed to 5 business days, this will then take into account Public Holidays. I have included a section in the glossary: Needs to advise when not stated as a Business days or calendar days that the reader assumes calendar days. The drafting of the procedure requires a breach to be remedied within 7 days (5 Business days) of the notice being issued, but then allows for a remediation plan to be considered. It would seem more appropriate for the 7 days (5 Business days) to be a trigger for the remediation of the issue **or** development and acceptance of a remediation plan. If the breach or remediation plan requires access to customer metering installations there may be a requirement for outage notifications to be issued to customers which require 4 **business** days' notice to the customer, making it very difficult to fix the breach in the 7 days (5 Business days).
5.1	Remediation Plan	The remediation plan has no reference to the contracted or affected parties – simply AEMO. It would be appropriate that any affected parties be made aware of the remediation plan as this will possibly affect the customer.

5.2	Past Conduct	The term warning, nor the levels of warning, have not been previously introduced in this document or defined. NER Clause 7.4.4 (b)(3) states: “the levels of a breach with severity below a material breach are to be treated as warnings with different levels of magnitude”. Aurora Energy would like to see what and how the levels of these warning relate to the 3 levels of breach
6.1	Material Breach	The section describes the deregistration of an MP/MDP or issuing of a default notice to an MC. If a MP/MDP is deregistered and unable to provide that service – it is unclear how those services will be provided especially if the MP/MDP has a majority of the NMI’s. this will affect both Customer billing and AEMO settlements as the data will not be available. This could also indicate that the MC and FRMP will then be in breach if they are unable to rectify the issue in 7 days, which is highly unlikely.
8.1.1	Material Breach	Needs to include all affected parties including “LR” for any notices 8.1.1 C
9.1.2	Metering Providers and Metering Data Providers	All parties should be referred to AEMO registration desk for de-registration, since there are likely to be flow on effects across the market.
9.2.1	All Applicants	The AEMO registration desk would be a more appropriate contact point for all parties as a starting point.
9.2.2	Embedded Network Managers	Formatting - Embedded Network Managers
APPENDIX	NOTICE OF BREACH	General comments:

A		1. A notices should list who has received copies/advise of the notice; using the applicable market Participant ID 2. Beach notices should be uniquely identified;.
APPENDIX B	METERING COORDINATOR DEFAULT NOTICE	7 days reference Needs to include Participant ID (s)
APPENDIX C	NOTICE TO APPOINTERS	Needs to include Participant ID (s)
APPENDIX D	OUTCOME OF REVIEW	Needs to include Participant ID (s)
APPENDIX E	NOTICE TO AFFECTED PARTIES	Needs to include Participant ID (s)

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
1	INTRODUCTION	General comment: If this procedure is to include T4a exemptions as an existence of a metering installation malfunction, this should be discoverable and available to all the related parties at the site (MC, MP, MDP, FRMP,LR and LNSP) as well as any prospective MC or Retailer, it is therefore suggested that a Type 4a reason code should be stored in MSATS as a means for any party to identify if a T4a is customer opt out or Comms issue. Aurora Energy would like to suggest that the exemption sits with the MP rather than the MC as the MP will have to have created the rectification plan and carry out the works, as a change of MC does not necessarily lead to a change of MP/MDP, particularly in the case of a FRMP churn. Therefore the exemption should be related to the MP on site.
1.1	Purpose and Scope	It seems unclear if this procedure is to be used for application for type 4a communications exemptions. As the current definition of Metering Installation Malfunction includes issues related to data collection and no other procedure has been published, is Type 4a covered by this procedure? If so, there should be further clarity to this procedure. If not, an exclusions sections should be added to clearly indicate that exemption for Type 4a related issues are not included and a separate process is to be followed.

1.3	Related AEMO Documents	Hyperlink does not work – unable to open glossary
2.5	Grant of Exemption	The exemption type for 4a No Comms available or a customer opt out (which is not an exemption) should show in MSATS? As any future FRMP or current FRMP may not know if or why a site is a 4a? NER (Cl 7.8.10(c)) requires the Metering Provider, not the MC, to provide a rectification plan to AEMO: (c) If an exemption is provided by *AEMO* under this clause 7.8.10 then the *Metering Provider* must provide *AEMO* with a plan for the rectification of the *metering installation*. This then indicates that clause (a) and (c) to be incorrect and would indicate that the exemption is associated with the Metering Provider and not the MC. This is different to the current procedure where the RP is responsible for the exemption but it makes more sense that the MP holds the exemption.
2.6	Application Unsuccessful	2.6(a) It seems inconsistent to suggest that an application may be rejected for insufficient information. Aurora Energy would like to suggest, that an application may be rejected if the information is not provided after a request from AEMO. This is indicated in 2.3 (c)
2.8	Current MC's Obligations during the Exemption Period	Aurora Energy would like to note that the MC has no obligation to advise affected parties of updates or changes to the rectification, Aurora Energy would like this be made an obligation by the MC.
2.9	Expiry of Exemption	C and D indicates in the wording that D cannot happen without C however, the MC may cease without the NMI being abolished, therefore change and to or in 2.9 (c). Aurora Energy would like to suggest that the change of MC should not change void the exemption where the MP stays as the current MP. Again Aurora Energy

		feels the exemption should sit with the MP.
3.2	Contents	3.2(e) any planned shutdown or outage periods – as this is a fault scenario does the 4 day customer outage notification still come in to effect? If so the 10 business days rectification before application is unlikely and therefore excessive amounts of applications would need to be created

4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
1.1	Purpose and Scope	1.1 dot point 1 Positive identification of connection points; perhaps add “which also provides the link to the relevant participants who have responsibilities at the connection point”.
1.3	Related AEMO Documents	Link to Glossary does not work
3	NMI STRUCTURE	(d) All *NMIs* issued for *connection points* which become contestable after 1 January 2001 are required to be all numeric. States only numeric but wholesale NMI’s are alphanumeric
10	NMI RULES	While Tasmania does not currently have any embedded networks – Aurora Energy would like to suggest that NMI’s going from a Network to an Embedded network or vice versa should be abolished rather than transition from LNSP responsibility to ENM responsibility.

5. Qualification Procedure

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
1.3	Related AEMO Documents	Document links do not work
2.2	Pre-Reading	c) Applicants wishing to submit more than one application, to discuss how to rationalise the information they need to be submit with those applications. Does not read well
3.2	Accreditation Checklists	The Category column does not reference where to find the references or what they actually refer to i.e. 1C, 1V, 1M etc. Also link to web site missing – Just shows [*link*]
3.6.4	Applicant System Testing	This section seems to indicate that participants have market systems and use them for B2B transactions for example (e.g. MP/MDPs). Embedded Network Manager system requirements are likely to be far less dependent on B2B transactions and Aurora Energy would recommend that those sections should be reviewed for a more appropriate process for ENM's, as they are far more likely to use different systems.

6. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
3.1	Systems and Interface Requirements	3.1(a) (ii) indicates that an ENM must establish and maintain the *B2B e-Hub* for the interface with *B2B Participants* – are ENM's expected to use the e-Hub for transactional requests service order works?
3.2	Embedded Network Information	(f) correspondence with all persons. – This statement seems very broad
3.3.1	ENM to Assist	Heading should be on page 7 to align with the paragraph
3.3.2	Timing of Audits	Should this say "or" rather than "and"
3.3.3	Notice of Audit	Should this say "or" rather than "and"
3.5	Review of Accreditation	Remove the and from the ENM is proposing to make significant changes or upgrades to an ENM's existing systems, telecommunications networks or a system platform; and as this indicated both C&D need to happen together rather than separately.
4.2.3	TNI	4.2.4 TNI Needs to be on page 9 as the header for the paragraph
4.3.1	Market Exit	4.3.1 (c) - The Roles do not need to be updated. Current Roles (i.e. Current ENM) remain recorded against the Child NMI. This indicates if the NMI returns to the Network those roles would apply unless updated and would be outdated, so should be infact removed.

7. Unmetered Load Guideline

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
2.1	The process	Aurora Energy agrees with the statement "If the process for assessment of an unmetered load is to seek eligibility in conjunction with an LNSP (Blue Diamond 1) then it may be more preferable to either have an LNSP as a supporting proponent when the application is made. If no LNSP is a supporter of a device, then perhaps a request should be made of all LNSPs to determine if they would contemplate connecting the device."
4.1	Generally	h) "that the mean the Unmetered Device load" – does not read right – should this be "that the mean for the unmetered devise"?

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments
Small Customer Metering Installation	**1**	Purpose	This guideline is focussed on the exemption process for connecting a meter to a telecommunications network, but does not link to a customer objection for telecommunications. Aurora Energy understand that AEMO would have to determine that any small meter which is classed as 4A, but for which there is no record of a telecommunications exemption would, by a process of elimination, have to assume that these remaining sites are customer objections. Aurora Energy considers this a poor outcome and believes that any site which is classed as 4A should have a record of a customer objection or telecommunications exemption provided to AEMO which is discoverable and should be identified within MSATS as customer Objection or telecommunications exemption.
Small Customer Metering Installation	**2**	Exemption	It has been widely discussed that the establishment of a telecommunications connection may be achievable but at a significant cost. The National Electricity Objective (NEO) requires that electricity services be provided in an efficient investment and operation in terms of price and security of supply. AGL therefore considers that the cost of telecommunications charges relative to the cost of manual meter reading

Document	Clause	Heading	Participant Comments
			and energy consumed should be considered as part of the exemption process so that the provision of telecommunications is provided within the obligations of the NEO.
Small Customer Metering Installation	**2**	Exemption	NER Cl 7.8.4(a) provides for an MC to demonstrate that there is no existing telecommunications network which enables remote access to the metering installation. In order to reasonably demonstrate the lack of a telecommunications network at a site, Aurora Energy would consider it reasonable that the MC and their contract parties have time to evaluate a site and the MP would have to establish appropriate telecommunications contracts or systems or networks prior to being required to submit the exemption. Therefore, in the interests of meeting the National Electricity Objective (NEO) for efficient operation of electricity services, Aurora Energy suggests that an MC/MP have 10 business days (in line with the time specified in the NER for type 4 meter malfunctions) from the installation date of a small customer meter to attempt to establish a connection to a telecommunications network prior to being required to submit an exemption.
Small Customer Metering Installation	**2.2.2**	Expiry	Clause 2.2.2(b) states that the exemption will cease 3 months after a telecommunications network provides coverage in the vicinity of a metering installation. Aurora Energy queries how this expiry would work operationally.

Document	Clause	Heading	Participant Comments
			The MC/MP may not be aware of a change in telecommunications network or start date, and could therefore discover that an exemption has expired unexpectedly, making them non-compliant. The implication is that an MC must have a mechanism to monitor telecommunications company network roll outs. Further, the presence of a telecommunications network in the vicinity does not mean that there is telecommunications availability at the metering installation Aurora Energy believes that the clause should be redrafted to state that Within 3 months of becoming aware of a telecommunications network providing coverage within the vicinity of a metering installation the MC must review the status of the metering installation and either enable communications (assuming no customer objection) or submit a new exemption application.
	3	Application Process	Aurora Energy considers that limiting the applicant to the MC may be inefficient and that the exemption should reside with the MP as the provider of the meter at the site.
	3.3	Timing of Application	Aurora Energy believes that there should be a 10 business day period from the installation of the meter until an exemption is required to be submitted, as is requires in the Exemption Procedure for malfunctions.

Document	Clause	Heading	Participant Comments
			This would allow for an efficient and cost effective electricity service to be provided by the MC/MP and reduce the number of applications required to be made to AEMO.
	4	Change of Metering Coordinator	Aurora Energy considers it likely that some MPs may be contracted to multiple MCs and that in undertaking a customer churn, including an MC churn, it would be unreasonable to consider that the same meter at site is only granted an exemption from one MC, rather than any MC through which that meter service is procured. Aurora Energy believes that if the exemption is limited to a single MC, then other MCs may reject a request to be an MC at a site until they can make a further application to AEMO, which would delay a customer churn. Further, the process of multiple MCs making application to AEMO for a meter provided by a single MP at the same site is inefficient and costly and is in contradiction to the NEO principles. Therefore, Aurora Energy believes that, while the current MC may be responsible for making the application, the exemption should reside with the MP and site and be discoverable through MSATS for incoming MCs and retailers.
	4.3	Change in Circumstances	Aurora Energy believes that the MC at the time (irrelevant of whether original or new) should be responsible for extending or changing the exemption.

Document	Clause	Heading	Participant Comments