METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: Secure Meters (Australia) Pty Ltd*

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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
2.7	Qualification Procedure	Reword required – "The process is identical, so they are consolidated into one document" - it should either be each process is identical OR the processes are identical
2.11	Exemptions	2.11.2 The wording makes it sound like that AEMO can exempt from installing a minimum spec meter when it will only be exempting communications being installed, the meters will still be minimum spec meters.
3	Glossary Term: HV	Why would the definition be – A Voltage greater than 1kV like the LV definition
3	Glossary Term: MSATS Procedures	The following suite of processes collectively – then list

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

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
1	INTRODUCTION	Nowhere in the document does the exemption process cover off the handling of exemptions on a Parent NMI of an embedded network or a Child NMI as an exemption on either will affect the settlement of Parent NMI
2.3	AEMO's Determination	For consistency AEMO should be must and not will.
2.6	Application Unsuccessful	In (b) why not state items that do not get exemption, for example communication problems, hence making it clear to applicants.

4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
3	NMI STRUCTURE	In 3 Needs to be reworded and broken into 3 categories. (a) Transmission NMIs (WIGS) (b) Distribution and Embedded Network NMIs (CATS) (c) Historical NMIs The current phrasing and break up is contradicting and clauses conflict with themselves. For example in (a) NMIs are generally all numeric and you cannot use “O” and “I” are not permitted. Clause (g) supports the need of a restructure Clause (a) (iv) needs to be re-examined, as it this to remain, this stops AEMO of issuing any NMIs in blocks as issuing a NMI with prefix 1234 to network ABCD is a meaning. Clause (d) means that AEMO cannot do (a) (vi)

8	CONNECTION POINTS WITH TYPE 1 METERING	Needs to be reworded - If the Check metering is equal to the Master, duplicated the MDP is required to average, this statement is not unique to type 1 metering under the rules, if the check meter is a duplication of the main meter the MDP is required to average, whether it is a type 1-6, not just type 1 and placing this clause under the type 1, gives the impression it is for type 1 only. - If the Check is not duplicated the averaging of the meter data does not apply
9	CONNECTION POINTS WITH TYPE 2 METERING	What is Partial check metering, there is no definition in rules or glossary – there needs to be a definition to allow the MC and AEMO make an agreement.

10	NMI RULES	The changing of the metering point to metering installation does not remove the conflicting statements in this clause, The NMI is allocated to a connection point not to a metering point, and if a NMI was issued to a metering point the market would not have NMIs with multiple metering points. The change should have been metering point to connection point. In the section Rule 2 – it contradicts itself by saying A NMI cannot be changed to relocated to another connection point, then in the next sentence, a NMI cannot be changes to LNSP network boundaries or ENM changes ---- 1. If a NMI moves to an embedded network it could argued they have changed their connection point hence needs a new NMI 2. But a NMI cannot change because LNSP boundary change, it could be argued that moving into a Embedded network is a LNSP change hence now we are saying it cannot change Then to just confuses all again, “if an End User changes the physical location of the connection point a New NMI must be allocated” – well it could be argued that the connection changes when a embedded network is created the connection point moves to the parents connection point, hence a new NMI is required.
12.16	One End User or Participant, Wholesale Metering at Transmission Node	In 12.16 the sentence “Any Participant intending to apply a logical meter to a connection point must contact AEMO’s Registration Desk seek approval prior to entering any data into MSATS”, is irrelevant and ambiguous, All wholesale connection points need to be submitted to AEMO meter registration desk whether they have a algorithm or not and should not be submitted into MSATS until AEMO approves of any wholesale meter point.

5. Qualification Procedure

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
2.2	Pre-Reading	Why would a MP & MDP not be required to read NMI Procedure
3.3	Application Fees	What is the process for an application being cancelled and getting deposit refunded? Will there be a schedule of charges? In a re-accreditation, for example multiple participants ids, using the same software system, would all require to pay full fees for qualification or could the multiple parties pay equal parts, even if they are different companies?

6. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
1.3	Related AEMO Documents	In the qualifications document it has stated a list required to be read by a ENM but they are not in the related documents

7. Unmetered Load Guideline

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments