METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *WINconnect Pty Ltd*

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1. Glossary and Framework

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(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	AEMO need to assure themselves that the initial qualification and accreditation of ENMS can be achieved in the time period from the final publication 1 March 2017 to the go live date for ENOS 1 December 2017. It's unclear why AEMO needs to know about ISO accreditation.
2.9	Service Level Procedure for Embedded Network Managers	Many of the practical requirements of the ENM will be in the CATS Procedures. We note that AEMO has already run through the consultation process on these documents in stage one. There could be more detail on fleshing out B2B procedures. Not just for services included in the B2B hub, but setting minimum level B2B standards for NUOS billing. AEMO need to outline clear enforcement strategy for non compliance. There are a number of over lapping commitments from both the ENO (in their regulatory obligation under the NSP guidelines) and the ENM (under accreditation). One example regards the maintenance of wiring information. The ENO may, from time to time, change or maintain wiring arrangements within a property. The ENM cannot always ensure timely provision on that

		information from the ENO. Further AEMO has no power to compel accurate information from the ENO, only the ENM. The ENO's commitment is to the AER and the current drafting of the NSP guidelines does not require them to furnish wiring information to the ENM in a timely manner. No comment on procedures in regards to identifying compliant/non-compliant metering based in previous installation date (see NSP guidelines section ##) No comment on potential jurisdictional carve outs. We note that QLD is currently running a consultation process on whether to adopt the framework. Victorian metering derogation: Will the LNSP continue to be the placed in the LNSP role and MC MDP/MP for child connection points? How is the ENM identified in initial NMI discovery for a wining retailer? How does the parent NMI EN code identify who the ENM is? The CATS procedures place obligations on "EN owner". (see 4.18. (B) (iii)) However, AER NSP obligations are to the ENO: owner, operator or manager. Also EN owners are not accredited SPs or Market participants. AEMO need to clarify how obligations on the "EN owner" are to be carried out.

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

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Clause	Heading	Participant Comments
6.2.2	Warnings	The warning and breach notification process seems reasonable.

3. Exemption Procedure (Metering Installation Malfunctions)

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4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
2.1	NMI Allocation by AEMO	ENMs are a contestable service provider and not fixed to a geographic or network area. If a block of NMIs are assigned to an ENM, will these be restricted for use only with specified ENs (defined by EN ID), DB area, state, or no restriction? AEMO should also be allocating EN codes.
2.2	Issue of NMIs by LNSPs and ENMs	There are a number of existing examples where a host LNSP may allocate a NMI for a new off market child connection point without consultation with the ENM or ENO. In such circumstances, a metering point may be connected with a market meter and a NMI may be made active in MSATS without the allocation of an EN code. It is difficult for the LNSP to identify when a connection point is actually within and EN or not. It is not clear how an LNSP is to identify a particular service point as an EN child and even if they do, it's not clear how they identify who the ENM is. AEMO should consider these examples and the process for an LNSP when receiving and neww connection service order or Allocation NMI service order for an embedded network customer in error.

		This should specifically consider the potential that a derogation on metering is extended in Victoria, as in that circumstance the LNSP is likely to facilitate metering to new connections.
10	NMI RULES	Rule 2 requires clarification: "NMIs cannot be changed where a Child NMI becomes directly connected to a distribution network or reverts to an embedded network connection." In the first instance, this would depend on whether the relationship between the Child NMI and the Parent NMI (i.e. the EN ID) can be end-dated, as otherwise, there would be market data settlement issues. How will the Parent Meter FRMP know whether to subtract the Child NMI data or not and for what period? In the second instance, is this referring to a brownfield conversion of a site to an EN? It does not take into account the different scenarios – EN Orphan (off-market, no NMI required) and EN Child (NMI required, but is the connection point considered the same for market settlement purposes?) Similar issue as highlighted previously.

5. Qualification Procedure

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
3.3	Application Fees	Upfront application fees may pose as an entry barrier to potential ENMS. Accreditation costs may be better served through an ongoing fee.
3.4	Queuing Policy	We appreciate the time required for AEMO to consider applications, however we aknowledge that it is in the industries best interest to ensure the process delivers a number of well resourced ENM entities to facilitate a competitive market for that service come 1 December,
3.6	Pre-Production Assessment	AEMO should consider exemptions at different stages for market participants who already meet pre qualifications and operated MSATS under the pervious CATS procedures.
3.7	Independent Review	The requirement for independent on site reviews seems to stretch the 8 month time line for accrediting all ENMS for 1 December start date. AEMO should also assure the market well in advance of a list of independent advisors.
3.7.1	On-Site Risk-Based Review	Clear guidance on the scope of this review will assist potential ENMs in considering how they prepare for such a review.
3.8	Final Accreditation Review	As above.

6. Service Level Procedure – Embedded Network Manager

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Clause	Heading	Participant Comments
1.3	Related AEMO Documents	Is this a reference to AEMO's Embedded Network Guidelines (Nov 2009) or will a new guideline be produced? It would assist for these guidelines to be updated to clarify roles and obligation to all interest and effect parties, including guidance to FRMPs when winning EN child customers and LNSPS in the same circumstances.
3.2	Embedded Network Information	(a) Type and configuration of metering installations for all child connection points This should, presumably apply to off market child connection points also. (b) Subtractive or other arrangements used in respect of those metering installations. We are unsure of what AEMO's intention is here. A subtractive metering arrangement should only be required to facilitate subtractions for the purposes on market wholesale settlement. The existing parent/child EN code relationships in MSATS facilitate this. The ENM

		should be required to record these relationships to the extent that they are required to ensure information in MSATS is accurate under the CATS procedures. Any off market subtractive arrangement may be noncompliant under the AERS onselling/network exemption guidelines, as any load being separately billed with the EN should be individually metered. (c) EN wiring information AEMO needs to clearly define "EN wiring information". (d) Version control of embedded network wiring plans or designs. As above, this requires tighter definition as to what constitutes a design. Whilst and ENM acting as a third party on behalf of the ENO can be expected to use best endeavours to ensure up-to-date wiring configuration is appropriately documented, it is difficult for them to certify this to be the case at any point in time. There must be some associated regulatory requirement on the ENO under the AER's network exemption framework to ensure that accurate information is made available in a timely fashion. Failure to clearly define this requirement may act as a deterrent to the entry into the market for ENM services. ENMs will only likely be exposed to regulatory risk that they can have direct control over. Whilst direct contractual conditions between the ENO and ENM may foresee these things, there needs to be a minimum standard set by both the AER and AEMO to ensure that relationship fosters seamless fluent implementation of market transactions by

		both the ENM and ENO. (e) Calculation of DLFs This should read calculation of 'site specific DLFs'. It's unclear why the ENO needs to hold information as to the *calculation* of a site specific DLF. The calculation methodology is between the AER and the ENO. The requirement on the ENM should only be to ensure that the accurate site specific DLF code is placed in MSATS. The accurate billing of the DLF is a matter for the child FRMP. (f) Correspondence with all persons This requirement is too vague. It should be more clearly defined or removed.
4.1	NMI Allocation	The requirement to provide the child NMI should be within 5 business days of the ENM receiving either the allocation of the NMI or the allocation of the EN code from the LNSP. There should be no obligation to allocate a child NMI in MSATS until the EN code is available.
4.3.1	Market Exit	It is more likely that the ENM would know about the market exit before the FRMP, e.g. churn to orphan. Is there a CATS procedure for the ENM to notify the FRMP of the impending change and if no objection, can change the NMI status to N on the required effective date?
4.3.3	Physical Rewiring to Join an Embedded Network	Which market participant should be changing the LNSP from the local distributor to the ENM at the time of the conversion? If there are no on-market children, i.e. all orphans, then there is no ENM?

7. Unmetered Load Guideline

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Clause	Heading	Participant Comments

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments