METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: SA Power Networks*

***Completion Date**: 11 November 2016*

Table of Contents

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

1. Glossary and Framework

No comments

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

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
3	DETERMINATION OF TYPE OF BREACH	SA Power Networks seeks greater understanding of the levels of impact for an: • Immaterial • Significant • Material Breach The procedure provides no guidance on how AEMO or a participant would assess what constitutes a non-material breach through to a material breach. There is no gauge on cost of service, number of customers impacted, cost to affected participant etc. Will these be scaled against Major, Minor or Incidental non-compliances identified in AEMO audits? Or conversely, have a relationship with AER civil penalties.

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
2	APPLICATION PROCESS	
2.1	Applicant	It should be noted within this clause that this procedure and therefore requirement to apply for an exemption does not apply to the the DNSP as the "Initial MC". The DNSP is only required to advise the current Retailer that a meter needs replacing – there does not appear to be any value in also needing to engage with AEMO in this exemption process.
2.5	Grant of Exemption	SA Power Networks strongly believe there should be an obligation to ensure affected parties, in particular those that are not contracted to the MC, but which are financially affected, be kept informed of the situation.
2.7	Extension to Exemption	SA Power Networks strongly believe there should be an obligation to ensure affected parties, in particular those that are not contracted to the MC, but which are financially affected, be kept informed of the situation.

4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
2.1	NMI Allocation by AEMO	SA Power Neteworks views that the NMI allocation to the ENM should be such that, a NMI or block of NMIs bear no resemblance to those of the LNSP. SA Power Networks suggests this clause be re-written to provide the industry clarity and ensure these ENM NMI'are clearly identifiable.
10	NMI RULES	SA Power Networks does not support the re-use of a NMI allocated and assigned to a customer directly connected to our Network as a Child NMI within an Embedded Network. Physical changes to wiring will be required at the site to enable this to occur and as part of that process, a new NMI should be established for the Child connection and the customers previous DNSP NMI made extinct. This approach will enabling the new relationships to be clearly established for the Child NMI and not create any confusion for the Industry with regards to the relationships prior to this significant change in electricity supply arrangements at the site.

5. Qualification Procedure

No comments

6. Service Level Procedure – Embedded Network Manager

No comments

7. Unmetered Load Guideline

No comments

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments