

METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

POC PROCEDURES CONSULTATION
(PACKAGE 2)

SECOND STAGE PARTICIPANT
RESPONSE TEMPLATE

Participant: EnergyAustralia

Completion Date: 18 January 2017

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1. Glossary and Framework

Clause	Heading	Participant Comments
3	Glossary	Addition to description: Life Support is also defined in the Energy Retail Code of Victoria New Term to add: NTC – Network Tariff Code.

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

Clause	Heading	Participant Comments
3.2.1	Remediation Plan	<p>Please refer to the suggested edits to this section that ensure this section reflects the scope of a remediation plan.</p> <p>Thought about how participants prevent reoccurrence of breaches should be considered as part of the remediation plan. The current wording suggests that only backlog or currently impacted parties are covered. Parties in breach should also be thinking and planning how they will prevent the breach from occurring again.</p> <p><i>If an MP, MDP, ENM or MC in receipt of a Notice of Breach provides AEMO with a remediation plan regarding the Breach, AEMO may take the remediation plan into account, provided that the remediation plan includes, as a minimum:</i></p> <p><i>(a) a demonstrated understanding of the Breach and its impact on AEMO, other Participants and/or End Users;</i></p> <p><i>(b) a demonstrated understanding of the cause/s of the Breach;</i></p> <p><i>(c) the actions, projected timeline (including remediation profile where relevant), resources and systems required to remediate the Breach (i.e. plan for current impacted parties, and plan to prevent reoccurrence);</i></p> <p><i>(X) identified controls to prevent reoccurrence of breach</i></p> <p><i>(d) communications and co-ordination with affected Participants where remediation activities require it;</i></p> <p><i>(e) a commitment to remediate the Breach by a specified date;</i></p> <p><i>(f) actions, resources or systems that have been, or are to be, deployed to mitigate the effects of the Breach prior to its remediation; and</i></p> <p><i>(g) regular reporting to, and meetings with, AEMO detailing progress of the remediation activities. The reporting and meeting frequency must be agreed by AEMO.</i></p>

Clause	Heading	Participant Comments
4.2	Constraints	In respect to item b, if AEMO were to limit an MDP from reading metering installations, this could have substantial impact on other participants and the market. This example should be removed. Other than that, this section is fine.
6.2	Process	Please include in the process description , the contact at AEMO the de-registration letter should be sent to.

3. Exemption Procedure (Metering Installation Malfunctions)

Clause	Heading	Participant Comments
Exemption – Meter Malfunctions		
2.3	AEMO’s Determination	<p>The clause indicates that AEMO has 5 business days to achieve items a) to d) however, (d) specifies 2 business days.</p> <p>Our view is that AEMO should respond within 2 business days. A more timely response will help prevent participants from being in breach of the NER.</p>
Appendix A.	APPLICATION FOR EXEMPTION	<p>Important Note in Appendix A indicates that a plan is required. This is not congruent with 2.4(g).</p> <p>The form should have this section removed.</p>

4. Service Level Procedure – Embedded Network Manager

Clause	Heading	Participant Comments
	General	EA is pleased with the inclusion of the hierarchy of rules that assist in clarifying conditions when a NMI is to be made extinct.
4.3.4	De-energisation and Re-energisation of Child NMIs	In the circumstance of de-energisation or re-energisation being facilitated by a remote service for a child NMI in an embedded network, the MP should be responsible for NMI register updates. Please clarify this in the procedure.

5. MSATS Procedures: National Metering Identifier

No comments on this Procedure

6. Qualification Procedure

No comments on this Procedure

7. Unmetered Load Guideline

No comments on this Procedure

8. Embedded Network Guide

Document	Clause	Heading	Participant Comments																		
	4.1	Retail Competition in Jurisdictions	ACT and QLD are not mentioned. Once the Embedded Network Rule change takes effect customers in these jurisdictions will also have the ability to choose their retailer. This section needs to be rewritten to account for the rule changes effective from 1 December 2017.																		
	5	Embedded Network Manager Obligations	<p>Suggest this section is changed to a matrix that lists participants who can operate in an Embedded Network and their key responsibilities. Here is an illustrative example that would need to be fleshed out.</p> <table border="1"> <thead> <tr> <th>Participant</th> <th>Key Responsibilities</th> <th>Supporting Instruments</th> </tr> </thead> <tbody> <tr> <td>ENM</td> <td>Create NMI for on market embedded network NMIs Maintain a register of On Market NMIs</td> <td>AER Exemption Guideline ENM SLP</td> </tr> <tr> <td>Retailer</td> <td>Offer retail services to on market child NMI</td> <td>NERR/ERC MSATS Procedures B2B Procedures</td> </tr> <tr> <td>AEMO</td> <td>Maintain a list of ENMs</td> <td></td> </tr> <tr> <td>ENO</td> <td>Appoint ENM where required</td> <td></td> </tr> <tr> <td>EENSP</td> <td>Billing on Market/Off Market NMI</td> <td></td> </tr> </tbody> </table>	Participant	Key Responsibilities	Supporting Instruments	ENM	Create NMI for on market embedded network NMIs Maintain a register of On Market NMIs	AER Exemption Guideline ENM SLP	Retailer	Offer retail services to on market child NMI	NERR/ERC MSATS Procedures B2B Procedures	AEMO	Maintain a list of ENMs		ENO	Appoint ENM where required		EENSP	Billing on Market/Off Market NMI	
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