METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: Active Stream (ACTIVMP)*

***Completion Date**:20/07/2016*

Power of Choice: Procedure Consultation – Package 1 round 2

Active Stream response

Dear AEMO,

Please see below for Active Stream's response regarding the second round stage of consultation for proposed amendments to 'Package 1' of AEMO Procedures in relation to the Competition in Metering, Embedded Networks and Meter Replacement Processes rules changes.

Should you have any questions about this response please contact Helen Stimpson, HStimpson@activestream.com.au

Yours faithfully,

Helen Stimpson

Service Delivery and Operations Lead, Active Stream

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General Comments

Topic/reference	Active Stream Comments
Drafting/change-mapping process	Tracked changes from the first round consultation had been accepted by AEMO in the second round consultation draft and therefore did not show up as a change to the original procedures. New sections have beed added to procedures which were not consulted upon in the first round of consultation. The above two points have lead to a protracted consultation review process with concerns that adequate time has not been given to address new sections included in the current consultation.
Incorporating comments from first round of consultation	Referring to Appendix A – where AEMO agreed to industry participant comments or suggested changes, there are several instances where these have not been incorporated in to the second round consultation version.
Numbering/sequencing	There are several numbering and sequencing errors in the procedures and within the participant response template
Glossary and Framework	Active Stream understand from AEMO that further changes to the Glossary and Framework may not be consulted on with industry. Active Stream encourage AEMO to consult on any proposed changes as seemingly small changes can potentially change the meaning of a definition and therefore compliance.
Type 4 and 4a	Active Stream believe that the process is yet to be adequately determined as to classifying and notifying relevant industry participants where Type 4 meters change to Type 4a meters and vice versa.

	Reasons for the change from 4 to 4a need to be made available as part of NMI discovery e.g. communications issues, customer refusal etc. to avoid future customer or compliance issues where an MC churns and is not aware of a customer refusal. More work on the process therefore needs to be undertaken by AEMO to clarify.
Objection logging period	Active Stream consider that a reduction from 5 days down to 1 is inadequate and suggests 2-3 day to avoid exceptions
Draft report and Determination ref. 4.10.2	Read Type Codes As Jurisdictional requirements have not yet been finalised (and Active Stream understands that these are being worked through by AEMO), it is considred necessary that these remain until the Jurisdictional requirements are met.
MDM Contributory Suffix (NMI suffix)	Active Stream recommend that AEMO consider moving the MDM Contributory Suffix from the “may be supplied” to the “must be supplied” category for this CATS CR. Active Stream are currently already doing this and support the position that it should be changed to ‘must’ rather than ‘may’.

1. Glossary and Framework

Clause	Heading	Active Stream Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
1.1	Purpose and Scope	AEMO have given credence to Active Stream's comments in the first round of consultation 'Appendix A - Consolidated Summary of Submissions and AEMO Responses'. There is no further feedback at this stage. However as noted in the General Comments section above, AEMO have signalled that they may not consult with industry on future changes which is of concern given the impact that even minor changes have on meanings of definitions. Therefore Active Stream suggest that AEMO consult with industry regarding any future changes.		

2. Meter Data File Format

Clause	Heading	Active Stream Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
3.3	File construction	3.3.5.c Tamper alarms should not be sent via MDFF. There are a lot of tampers that are created when installations or maintenance (eg.faults) are performed at the site. As a result a level of investigation must be performed by the back office before confirming that a tamper is legitimate. These legitmate tampers must be notified to the MC and the LNSP, but not using the MDFF. This is not practical and is an expensive solution to implement.		

3. Metrology Procedure: Part A

Clause	Heading	Active Stream Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
1	INTRODUCTION	Wording such as 'estimate' compared with 'forward estimation' needs to be used correctly and consistently		
1.3	Related Documents	Jurisdictional rules should be included as well as Glossary and Framework		
4.1	Requirement under National Measurement Act and Use of Standards	The use of the word 'intended' is not relevant. The obligation should apply to any equipment installed at a connection point		
4.2	Use of Optical Ports and Pulse Outputs	"90 days of interval data in 35 seconds or less" – needs to state it is applicable to only market data channels associated with the metering		

		installation.		
4.6	Grandfathering	Active Stream believe that this section should read as follows: "requirements of a relevant Jurisdiction". Otherwise one could potentially say that one has met the requirements even though they are not the requirements for that jurisdiction.		
4.10	Alarm Meters	Some alarms identified are listed elsewhere as obsolete. This needs to be consistent and relate back to MDFF. E.g. tamper has been included as a reason code but not included in Metrology Part A		
7	EMBEDDED NETWORKS	Active Stream understands from AEMO's response from Stage 1: Jurisdictional matters are being reviewed by jurisdictions and DOIIR in consultation with participants.		

		What is the estimated response date?		
8	REVERSION OF METERING INSTALLATION TYPES	NSW – what are these clauses being referred to? ACT – what if type 2 or 3 is installed, can relevant parties comply with type 4 rules?		
10.1	Installation by ASPs	If there are no details in the table then clause 10.1 should be removed from this document		
11.3	Meter Churn Process	More information should be provided e.g. Meter type – WC/LVCT, number of phases, number of elements 1E, 2E or 3E. AEMO response from Stage 1: 'Current list is sufficient', however Active Stream disagree with this		
13.2	Metering Data Collection	The jurisdictional rules do not have significant relevance to data collection, they are more related to installation		

13.5	Verification of Metering Data for Direct Connected Small Customer Metering Installations, Type 4A, 5, 6 and 7 Metering Installations	Under 13.5 it is not clear if the verification of metering data as per sample testing Plan is also applicable for Type 4 Direct connect Small customer Metering installations. Active Stream believe that it should not be applicable to type 4 Direct Connect Metering and should be clearly clarified in this clause. Please clarify under 13.5 whether or not type 4 whole current meters are also required to have data verification as per sample testing plan. Active Stream reject having a requirement to provide data verification for type 4 whole current meters as a mandatory requirement under clause 13.5.		

4. Metrology Procedure: Part B

Clause	Heading	Active Stream Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
1.3.	Related Documents	The following related documents should be referred to: -Jurisdictional documents and glossary and framework -MDP SLP		
2.4.	Metering data quality flags	Definition of 'A' is validated metering data. The definition of metering data includes sub data…this is misleading. All metering data is validated, including substituted data? Need to state interval and accumulated data. These are defined terms meaning Actual meter data obtained from meter. (b) & (g) – need to check the		

		definition of metering data. It includes Interval, accumulated and substituted data. These clauses do not apply to substituted data. Hence accumulated and interval should be reinstated		
3.3.	Substitution Types	The use of Type 20 is not correct. You can't use Table 1 as you do not have Previous data. You have to use Forward dated data. That is data that is after the churn period. The current Procedures only allow subsitutions from a previous day prior to the churn date. This is not possible with churn subs. This same point has been made in a few submissions.		
10.2.	Validations to be performed for metering installations with check metering or partial check metering	10.2e ii. This is not correct statement. Only the alarms identified in MDFF spec (Power Outage and Time Reset) will be sent to the registered participant. This statement implies all Meter Alarms will be sent via MDFF which is not correct.		

		Alarms such as VT or phase failure, pulse overflow and cyclic redundancy errors will NOT be sent in the MDFF		

5. MSATS Procedures: CATS Procedure Principles and Obligations

Clause	Heading	Active Stream Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
2.2	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	The numbering is not consistent		
2.4	METERING DATA PROVIDER	(c) The paragraph needs to be clearer what must happen with Interval Datastream status when the de-energised is done remotely or physically. As per 1st stage reponse, Active Stream's position is that Datastream should be made 'inactive' where the site has been physically de-energised and 'active' for remotely de-energised site. The statement of "The proposed Change Date must be the day after the connection point is de-		

		energised" can lead to misunderstanding. The statement has been used in LNSP obligation at section 2.3.J. For example: LNSP updates NMI status to D with Propose Change Date = 01.07.2016, which means De-energisation happens on 30.06.2016. But because of the statement above, some MDP's may potentially think that the proposed date to inactivate interval datastream is 02.07.2016). In this case, the statement must be clear such as "the proposed change date must align with the date when NMI Status become De-energised (updated by LNSP)" (e) similar to above comment. The statement must be clear such as "The proposed change date must align with the date when NMI status become re-energised (Updated by LNSP)".		

3.4	CHANGE REQUESTS	Table 3-2. “Provide Data” section: Remove CR6801 as this is no longer required as per section 38.6		
3.7	VALID PROPOSED CHANGE DATE FOR PROSPECTIVE AND RETROSPECTIVE CHANGE REQUESTS	3.7.1(a) change to “the date the Change request is raised…”		
4.10	END USER CLASSIFICATION	4.10.2.b Inconsistency using NMI status code ‘R’. This paragraph still refers to NMI status Code ‘R’ while in Table 4-8, NMI status R has been removed. Suggest removing ‘R’		
4.11	STATUS CODES (NMI AND DATASTREAM)	4.11.1.b Duplicate ‘are’. 4.11.3.b The meter register codes listed is not consistent with Table 4-10. 4.11.3.c. and 4.11.3.d This sections describe Datastream attributes. Therefore these		

		sections should be moved to section 4.11.2		
4.12	METERING INSTALLATION TYPE CODES	Table 4.12 – What's the purpose of Manually Read Flag column? COMMS meters are remotely read meter. Therefore, the column should have value "N".		
7.1	Application [1000 1010 1020 1030 1040]	Should start with "Section 7 applies when:" because it refers to Section 7 not 6.		
7.4	FRMP Requirements	(j) can't new FRMP populate MDP as well? (k) Actual End Date may be populated for all retrospective change. Therefore it can apply to CR1010 and CR1040 if necessary.		
7.5	MDP Requirements	(b) be more specific that CR1500 is required in order to Complete CR1000/1010/1030/1040		

7.6	MC Requirements	Suggest 'Current MC', not 'New MC'		
8.1	APPLICATION [1021 1022 1023 1024 1025 1026 1027 1028 1029]	"section 10" should be changed to"Section 8".		
8.4	FRMP Requirements	(d) Remove MDP from table, the CR should be routed to the relevant MDP. Otherwise should be Current MDP (f) can't new FRMP populate MDP as well?		
8.5	MC Requirements	Suggest 'Current MC', not 'New MC'		
8.7	Objection Rules	Couldn't find Table 7-A. Please refer to the correct table		
9.1	APPLICATION [1080 1081 1082 1083 1084]	Change "Section 8 applies when" with "Section 9 applies when"		
9.4	FRMP Requirements	(j) see earlier comments re not changing MP on retail transfer, misleading regarding churn rules		

9.5	MDP Requirements	(b) Is it on receipt of a data request, OR - On receipt of a data request, the CR status is PEND and meter is installed, whichever date is later. Also be precise that CR1500 required to complete the CRs.		
9.6	MC Requirements	Suggest 'Current MC', not 'New MC'		
10.1	APPLICATION [1500]	Change "Section 9" to "Section 10"		
10.2	CONDITIONS PRECEDENT	Suggest that this document actually stipulated where a 1500 is required, what are the prerequisite's etc. These are conditions precedent.		
10.4	MDP Requirements	Please list what CRs that require CR1500 so it is precisely written and not confusing when reading the document.		

10.5	TIMEFRAME RULES	Statement could be a lot clearer. The impact is that, if the CR is not raised within these 20 days, a new retro CR1xxx or 6XXX has to be raised. Again, status at PEND and meter install dates are key Also, there is no “Table 9-A” in the document. Please update with correct reference.		
12.1	APPLICATION [2020 2021]	Change “Section 11” to “Section 12”		
13.1	APPLICATION [2500 2501]	Change “Section 12” to “Section 13”		
15.1	APPLICATION [3000 3001]	Change “Section 13” to”Section 15”		
15.3	INITIATION ROLES	Fix the reference error pls		
15.4	MPB Requirements	(C) an obligation for the MP to update the NTC as mandatory is not supported by Active		

		Stream. Active Stream believes this field should be optional for MPs, not mandatory. The responsibility should lie with the LNSP to update the NTC, with the ability for the MP to update the field with any corrections based on meter configuration installed. LNSPs may request MPs to perform these NTC updates on their behalf through commercial arrangements In order for an MP to be able to provide an accurate update to the NTC field, MP's would need to be provided with a mapping table of basic to interval NTC's, e.g. NTC B1 =I1		
15.7	CHANGE REQUEST STATUS NOTIFICATION RULES	Fix reference erorr please		
16.1	APPLICATION [3004 3005]	Change "Section 14" to		

		"Section 16"		
16.4	MPB Obligations	Same as section 15.4		
17.1	APPLICATION [3050 3051]	Change "section 15" to "section 17"		
17.4	MPB Requirements	See section 15.4		
18.1	APPLICATION [3080 3081]	Change "Section 16" to "section 18' Are you sure this is the right way to allow the CR to nominate MDP,MPB,MPC? If yes, isn't CR1500 required?		
19.1	APPLICATION [3090 3091]	Change "Section 17" to "section 19' Are you sure this is the right way to allow the CR to nominate MDP,MPB,MPC? If yes, isn't CR1500 required?		
20.1	APPLICATION [3100 3101]	Change "Section 18" to "Section 20"		
21.1	APPLICATION [4000 4001]	Change "Section 19" to		

		"Section 21"		
22.1	APPLICATION [4004 4005]	Change "Section 20" to "Section 22"		
23.1	APPLICATION [4050 4051]	Change "Section 21" to "Section 23"		
24.1	APPLICATION [5070 5071]	Change "Section 22" to "Section 24"		
24.5	TIMEFRAME RULES	How can a retro NSRD be created? Is this in case something was missed? If so, then similar to below comment, limit should be 90/100 days. How can the prospective period only be 3 days? All other CRs, the prospective period dictates the latest the proposed date can be, which is the equivalent of the NSRD. Therefore, shouldn't this be 90 days or 100?		
26.	MAINTAIN NMI – CHANGE A NMI – SMALL OR LARGE	Suggest splitting CR in to NMI status updates and NMI		

		general info updates, or at least some sort of identifier to stipulate that status is being changed.		
26.1	APPLICATION [5050 5051]	Change “Section 24’ to “Section 26”		
32	CHANGE ROLE – CHANGE MDP – SMALL OR LARGE	Are we getting rid of 62xx and 67xx? Not required since LNSP as MC will be given access to 68xx Why have MDP obligations been removed? How about 1500 on 6200?		
32.1	APPLICATION [6200 6210]	Fix the section number		
33.1	APPLICATION [6300 6301]	Fix the section number		
37.	CHANGE ROLE – CHANGE MPB OR MPC OR BOTH – SMALL OR LARGE	Are we removing this CR?		
38.1	APPLICATION [6800 6801]	Fix the section number		

38.3	INITIATION ROLES	A new MC can also initiate a CR to make themselves MC and change the MP/MDP		
38.6	MDP OBLIGATIONS	(a) Sentence is misleading. If the meter has not been installed then the 1500 cannot be initiated.		

6. MSATS Procedures: MDM Procedures

No comment from Active Stream

7. MSATS Procedures: Procedure for the Management of WIGS NMIs

No comment from Active Stream

8. NEM RoLR Process Part A and B – MSATS Procedure: RoLR Procedures

No comment from Active Stream

9. NMI Standing Data Schedule

No comment from Active Stream

10. Service Level Procedures for MDP

Clause	Heading	Active Stream Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
2.2	Use of sub-contractors	(g) should be MDP not MP		
2.3	Specific obligations for MDP - Category D	Why must reactive energy be stored in the MDM system just because it is in the meter? There is a lot of other data which is also stored in the meter but not stored in the Meter Data Management system. MPs may wish to program meters with Reactive Energy but the MDP may only want to collect and store it when it is required to distribute the Reactive Energy. This flexibility is essential when you consider Reactive Energy for the Mass Market and the possibility of customers moving to Demand Tariffs.		

		The MP should be allowed to setup their meters with E,B,Q,K channels, but the the MDPs should only be required to collect, store and distribute the data that is required by the Market. Suggest re-wording or removing.		

11. Service Level Procedures for MP

Clause	Heading	Active Stream Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
2.1	Metering Provider Capability and Competency	Clause 2.1 (d) (1) should read" Applicable AS 3000 wiring rules for metering related work. Not all clauses of AS 3000 is applicable to metering related work.		
2.2	Use of sub-contractors	(e) What is the definition of "sub-contractor"? Does it mean each new field technician has to be notified to AEMO? Does AEMO want to know about all contractors sub-contractors? The requirements are too onerous and should be changed to the MP to maintain a register of sub-contractors		
3.3	Management of test	Active Stream are re-instating position taken in first round		

	equipment	that was not accepted by AEMO: 3.3 c) wording is very prescriptive. Testing equipment are only “Tested” not “Calibrated” by a NATA accredited testing laboratory. Should be “tested to ensure full traceability to a test certificate by a NATA accredited testing body” This should be in line with NER working and removed from this document		
4.1	General commissioning requirements	These commissioning requirements should be applicable for CT metering installations only This was not addressed by AEMO in the feedback on first round of comments		
4.4	Meter Churn	4.4 installation cannot be performed before CR goes PEND **and before the proposed date is reached**, whichever is later.		

		(a) (iii) Consider removing clause. MDPs will be notified by CRs that they are losing the site and can increase their polling frequency – you could also split into large and small, no requirement for small NMI classification. That said, this clause does not stipulate when the final read must be taken.		