METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Ergon Energy*

Completion Date: *20 July 2016*

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1. Glossary and Framework

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes

2. Meter Data File Format

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Clause	Heading	Participant Comments		
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3. Metrology Procedure: Part A

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Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
3.1	Overall requirements	Ergon Energy considers that further clarification is required is regards to the statement that: "MCs must use MPs to provide, install, test and maintain the relevant components…" Whilst this statement reflects existing wording, the use of "provide" often creates contention between participants, especially in High Voltage installations where supply / ownership of plant has been agreed between the DNSP and the customer as part of the connection		

		agreement, often months / years before a FRMP is appointed and MC / RP is known. As such in those situations it is not possible for the MP to "provide" the relevant components. In addition, in some jurisdictions Low Voltage Current Transfomers are supplied by the DNSP at the request of the customer and prior to the appointment of the MP. As such, Ergon Energy recommends the wording is amended to reflect a requirement that: "MCs and MPs must ensure provision is made for required components, and that components are properly selected".		

		Further, in a minor typographical error, remove the word "the" in first paragraph. "as specified in the NER and ~~the~~ this Procedure,".		
4.4	"x" values – Calculation and use	Please refer to main submission.		
4.5	"y" values – Calculation and use	Please refer to main submission.		
10	INSTALLATION OF METER(S)	Please refer to main submission.		
12	DE-COMMISSIONING AND REMOVAL OF METERING EQUIPMENT AND NETWORK DEVICES	Clarity needs to be provided to ensure the incoming MP has accountability for the final reads.		
12.1	Network Devices	Please refer to main submission.		
14.1	Criteria for determining Emergency Condition	Please refer to main submission.		

4. Metrology Procedure: Part B

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes

5. MSATS Procedures: CATS Procedure Principles and Obligations

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Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
	QUICK REFERENCE GUIDE			
	HOW TO USE THIS DOCUMENT	In the example table on page 5, Ergon Energy recommends that "NMI *size*" should be changed to "NMI *classification*", as 'classification' is the correct term when referring to types of NMIs.		
2.1	GENERAL OBLIGATIONS	In clause 2.1(a): "Participants must select the most applicable Transaction Type Code for their proposed transaction." For consistency with common terminology, Ergon Energy recommends the section		

		includes "Change Request Code" as below: (a) Participants must select the most applicable Transaction Type / *Change Request Code* for their proposed transaction. Further, in the below clause we recommend deletion of the highlight word. 2.1 (j) CATS Participants must consider and action as necessary within two business days any requests from Particpants that ~~they~~ have been incorrectly assigned CATS Participants Roles.		
2.3	LOCAL NETWORK SERVICE PROVIDER	For clarity Ergon Enegy recommends the wording in 2.3(m) is changed to: "Provide Network Tariff Codes and descriptions to AEMO for the initial population of the Network Tariff Code in MSATS so that the appropriate tariff		

		can be applied at the Register ID level."		
2.5	METERING PROVIDER – CATEGORY B	The procedure is not clear as to which party is responsible for the impacts of any error which may occur in relation to population of the Network Tariff Code. Ergon Energy recommends that the procedure stipulate that the party responsible for the error should be required to rectify, and if necessary, provide billing rectification to the retailer and / or customer.		
2.6	MC	As above.		
3.1	OVERVIEW	Ergon Energy recommends the below change to reflect correct terminology. 3.1(i) A Change Request carries with it a set of CATS Standing Data items. The set of data items will vary with the transaction selected by the Participant initiating the Change Request.		

		Each ~~reason~~ *transaction* has a code (Change Reason Code), as detailed in section 4.2 and Table 4-A.		
3.2	PRINCIPLES	Ergon Energy recommends the below change as it more accurately reflects the requirement. 3.2 (i) Jurisdictions will specify rules to control who is allowed to object to a Change Request, the reason for the objection and the NMI Classification Code ~~to be assigned~~ *appropriate* to that Objection.		
3.4	CHANGE REQUESTS	Ergon Energy recommends the below change as it more accurately reflects the requirement, that names and roles of organistations are not provided, but rather a Participant Code is provided – which includes names and roles.		

		3.4 (b) Information about an End User's connection point include the names and Roles of organisations *(Participant Codes)* that provide a connection point service to the End User, the technical details associated with the End User's metering installation and specific information that would assist retailers in providing competitive offers to End Users.		
11.5	MPB Requirements			Where NMIs are created as part of a greenfield development, the MPB may not yet be aware of the meter type upon connection, and thus it cannot be provided to MSATS as required under this clause. As such, Ergon Energy recommends that the clause be amended to note that if the NMI status is A or D the meter type code should be provided, and

				that once the meter type code is known by the MPB, it must then be provided to MSATS.
28	MAINTAIN NMI – CHANGE NMI EMBEDDED NETWORK (CHILD) – SMALL OR LARGE		Ergon Energy notes that the Customer Classification Code for Child NMIs required.	
42.3	REQUESTING PARTICIPANT REQUIREMENTS		Ergon Energy notes that clause 42.3 (g) – should include Customer Threshold Code.	

6. MSATS Procedures: MDM Procedures

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

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

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4.2	General Obligations for MSATS Participants	Ergon Energy notes that MCs may have in-flight service orders that DNSPs are not aware of. As such we recommend that a further section is required to detail an MC's obligations in the event of a ROLR, for any in-flight service orders (e.g. for remote re-energisation / de-energisation).		

9. NMI Standing Data Schedule

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
2	NMI STANDING DATA SCHEDULE	Ergon Energy recommends for clarity and accuracy, this section should include a description / explanation of each data element, and be aligned to the NMI attibutes - as per the CATS and WIGS procedures.		

10. Service Level Procedures for MDP

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11. Service Level Procedures for MP

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2.2	Use of sub-contractors			2.2 (e) Ergon Energy recommends the mechanism for the notification and the information required within the notification be defined, to provide clarity and quality of process.
3.3	Management of test equipment			3.3(c) Ergon Energy maintains and

				calibrates our test equipment against referenced standards as provided by NATA. As such, test equipment should be "traceable to" not "calibrated by" a NATA accreditated laboratory, otherwise we will be required to send all our testing equipment to NATA for calibration; increasing costs.

12. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments