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DRAFT DETERMINATION – COMBINED PARTICIPANT RESPONSE PACK

METER CHURN PACKAGE

***Participant**: Combined Participants*

***Completion Date**: 8th December 2015*

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1. Proposed Changes

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- SLP Metering Data Provider Services – Section 8 and Section 9
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NOTE: Below are two specific things requiring comment:

Effective date of implementation

Significant change to 8.1.6 (c) of the MDP SLP.

Other minor changes please refer to the combined response packs for more information.

Please include your comments in the 'Participant Comment' column below.

A. Proposed Changes to the Meter Churn Package

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
1	**PROPOSED/ REQUESTED CHANGES**			
	During the feedback process for first stage consultation AEMO received comments regarding the implementation date of December 2014. Feedback received requested a September or November 2015 implementation date. Implementation dates were discussed at the MSWG on the 31st October 2014 with the most favourable date being November 2015 by the members of the MSWG. AEMO has provided 2 options: Implementation date of 30th September 2015 as per majority of the feedback from participants;		**AGL** AGL's preference between the two options is to align the effective date with a November 2015 MSATS/B2B system release. AGL also requests AEMO inform participants formally as part of the consultation process if any conditions are placed with changing the effective date. **Ausgrid** Ausgrid would agree that a November 2015 implementation date aligning with the MSATS/B2B system release would be most appropriate.	AEMO referred the submissions on the effective date to the AER. The AER have confirmed that an effective date of 1st September 2015 is acceptable. Once effective, all meter churn activity, whether or not it was initiated prior to or after the procedure effective date, will need to be compliant with the requirements of the NER and the meter churn procedures.

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	Or Implementation date of November 2015 to align with a MSATS/B2B system release.		**Energy Aust** EnergyAustralia supports alignment to the November 2015 MSATS / B2B System release **ERM** If this change should proceed, ERM Business Energy prefers an implementation date of November 2015 to align with a MSATS/B2B system release. Grandfathering would be required for contracts that have already been executed that comply with the current Procedures (i.e. require meter replacement prior to contract start date). It is important that the implementation of the proposed Procedures allows retailers to honour these existing contracts, which were entered into in good faith based on the Procedures in place at that time. Renegotiation of these contracts is not a viable option. Not only would this require significant resources, but would also impose on the customer significant additional cost due to the requirement for an additional metering services contract for the transitional period between their contract start date and meter replacement under the proposed Procedures. Transfers of some of these customers have already been generated in the market; however there are also some contracts that do not commence for a number of years (i.e. beyond the proposed effective date). We believe that where contractual arrangements were entered into prior to the final determination of the new Procedures,	

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			these contracts should be allowed to proceed in compliance with the current Procedures. **Endeavour** It is not clear why September or November 2015 is nominated when the next MSATS/B2B system release is May 2015. Given that there are actually no changes to MSATS or B2B due to this consultation another start date for consideration is 01/07/2015. **Origin** Nov 2015 to align with MSATS/B2B system releases. **United Energy** UE support the change of the effective date from 31 Dec 2014 to late in 2015. UE prefer to align the changes in this meter churn pack and the consequential MDFF changes with the Nov MSATS release. UE considers that given the MDFF changes have not commenced consultation that this may allow more time to plan any IT changes required	

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	Meter Churn for FRMP			
	1.2.1 This Meter Churn Procedure details the requirements that the *financially responsible Market Participant* and the *responsible person* must consider in the management of *Meter Churn* resulting from an alteration to a *metering installation*. 1.2.2 In accordance with clause 7.3.4 (m) of the *Rules*, this Meter Churn Procedure also applies to *financially responsible Market Participants* who are not the *responsible person* for a type 5 or type 6 *metering installation* that is being altered.		**Energy Aust** This procedure is established under Rules (7.3.4 (j)) for the FRMP only not the RP as 1.2.1 suggests. The following changes to clauses 1.2.1 and 1.2.2 to correct this error: **1.1 Introduction** 1.1.1 This Meter Churn Procedure details the requirements that the *financially responsible Market Participant* : a) who is the *responsible person* must consider in the management of *Meter Churn* resulting from an alteration to a *metering installation*. b) who is not the *responsible person* for a type 5 or type 6 *metering installation* that is being altered. The move to an Introduction also rectifies the document commencing with Interpretation, which is in misalignment to other AEMO documents.	AEMO in consultation with the MSWG. Updated wording in the document below. 1.2.1 This Meter Churn Procedure details the requirements that the *financially responsible Market Participant* ~~and the responsible person~~ must consider in the management of *Meter Churn* resulting from an alteration to a *metering installation*. 1.2.2 In accordance with clause 7.3.4 (m) of the *Rules*, this Meter Churn Procedure ~~also~~ applies to *financially responsible Market Participants* who are not the *responsible person* for a type 5 or type 6 *metering installation* that is being altered.

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	1.1.5 In this procedure, diagrams are provided as an overview. If there are ambiguities between a diagram and the text, the text shall take precedence.		**AGL** AGL does not support the insertion of this new clause, it is our opinion that figure 1 does not provide a sufficient overview of the process and that ambiguities between what is provided in a diagram and the text should not exist. AGL also notes that this insertion did not exist when there was several diagrams in the original document. AGL is with the view that there is benefit with time being allocated to map the scenario's collectively with MSWG members as part of the next meeting scheduled 9th December 2014. As part of the Churn Package, there does not appear to be an end to end process map which captures the meter churn process and obligations across all relevant participants' roles and timelines.	This clause is consistent with our internal advice and the current MDP SLP. Process flow updated.
	Endeavour Energy put forward the following suggestion in round one consultation: 2.1.3 This Procedure details the requirements for ~~two~~ three additional scenarios that require the *financially responsible Market Participant* to perform additional actions: a) Type 5 or 6 to a type 1-4 *Meter Churn* -		**Energy Aust** EnergyAustralia supports the addition of the additional scenario provided by Endeavour Energy. The first stage response provided by AEMO does not reflect that a FRMP RP can't be responsible for a type 5 or 6 meter type. *AEMO consider that the recommended change is covered in section 1.1.2 (now*	AEMO in consultation with MSWG agreed insert the following wording as the new clause 2.1.3. 2.1.3 Where the *financially responsible Market Participant* is the *responsible person* for a type 1-4 *metering*

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	where the *Local Network Service Provider* will remain as the *responsible person*: i. The *financially responsible Market Participant* may request the *responsible person* perform *Meter Churn* in accordance with the *B2B Procedures*, having first requested and accepted the *Local Network Service Provider*'s offer to be the *responsible person*. b) Type 5 or 6 to a type 1-4 *Meter Churn* - where the *financially responsible Market Participant* intends on becoming the *responsible person:* i. The *financially responsible Market Participant* for the *market load* in MSATS can engage its selected service providers to perform *Meter Churn*, providing the *responsible person* has been made aware of the *Meter Churn* in advance. Following the *Meter Churn*, the *financially responsible Market Participant* must become the *responsible person* in accordance with the MSATS Procedures. c) Type 1-4 to type 5 or 6 *Meter Churn* - where the *Local Network Service Provider* will become the *responsible person*: i. The *financially responsible Market Participant* must request the *Local Network Service Provider* to perform *Meter Churn* in accordance with the *B2B Procedures* and jurisdictional requirements.		*2.1.2). The FRMP would either be the RP, or would be liaising with the RP, who would be responsible for instigating the meter churn. Either way, the meter churn would be undertaken by the RP rather than the FRMP.* The addition of this clause provides clarity that there is an interaction between the FRMP and the LNSP to undertake the reversion to 5 or 6, which provides clarity. The clause 2.1.2 does not reflect the nuance that a FRMP RP can't install a 5 or 6 meter. and Ausgrid's first round comments: "There is no mention of a Type 1-4 to Type 1-4 meter churn scenario? That is, if the FRMP initiates meter churn for an existing Type 1-4 installation and wants to become the RP." EnergyAustralia agrees that this scenario needs to be included. The following wording suggested: b) Type 1 - 4 to a type 1 - 4 *Meter Churn* - where the *financially responsible Market Participant* intends on becoming the *responsible person:* i. The *financially responsible Market Participant* for the *market load* in MSATS can engage its selected service providers to perform *Meter Churn*, providing the *responsible person* has been made aware	*installation* that is changing to a type 5-6 *metering installation* and the *Local Network Service Provider* will become the *responsible person* as a result of the change, the *financially responsible Market Participant* must request the *Local Network Service Provider* to perform *Meter Churn* in accordance with *B2B Procedures* and jurisdictional requirements. Metering installation Type 1-4 to 1-4 meter churn does not need to be stipulated. 7.2.2 of the rules supports FRMP becoming RP.

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			of the *Meter Churn* in advance. Following the *Meter Churn*, the *financially responsible Market Participant* must become the *responsible person* in accordance with the MSATS Procedures. **Endeavour** Added an extra clause to reflect the scenario of a Type 1-4 to type 5 or 6 Meter Churn. AEMO stated in the draft determination that this is covered in the new clause 2.1.2 We agree that in general the new clause 2.1.2 could cover the third scenario, however by adding the suggested clause it will provide more clarity. It clarifies that the FRMP, who may or may not be the RP, can initiate meter churn to type 5 or 6 only by requesting the LNSP and the request may be subjected to the B2B Procedures and jurisdictional requirements. An example of a jurisdictional requirement is the metrology reversion policy.	
	3.1.2 c (new clause) Where the *Local Network Service Provider will become the responsible person* for the *metering installation* as a result of the *Meter Churn, the financially responsible Market Participant* must request the *Local Network Service Provider* to perform *Meter Churn* in accordance with the *B2B Procedures* and jurisdictional requirements.		**Energy Aust** Consistent with changes to 1.1.3 this clause is required to reflect 1-4 to 5-6. The 1-4 to 1-4 is covered by clause 3.1.2 b). **Endeavour** Added an extra clause to reflect the scenario of a Type 1-4 to type 5 or 6 Meter Churn.	AEMO in consultation with the MSWG. Updated wording in the document below. 3.2.1 c) Where the *Local Network Service Provider will become the responsible person* for the *metering installation* as a result of the *Meter Churn, the*

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			AEMO stated in the draft determination that this is covered in the new clause 2.1.2 We agree that in general the new clause 2.1.2 could cover the third scenario, however by adding the suggested clause it will provide more clarity. It clarifies that the FRMP, who may or may not be the RP, can initiate meter churn to type 5 or 6 only by requesting the LNSP and the request may be subjected to the B2B Procedures and jurisdictional requirements. An example of a jurisdictional requirement is the metrology reversion policy.	*financially responsible Market Participant* must request the *Local Network Service Provider* to perform *Meter Churn* in accordance with the *B2B Procedures* and jurisdictional requirements.
	3.1.4 Where there will be a change in Metering Service Provider or responsible person as a result of Meter Churn then the financially responsible Market Participant must raise a prospective change request in MSATS nominating the role changes prior to initiating the Meter Churn.		**AGL** AGL questions whether this clause is correct in its entirety. It is our understanding that it is also possible that a change of RP could occur retrospectively if agreed between participants. The current churn procedure includes a process overview of Meter Churn post transfer using a 6801 which AEMO is proposing to remove and we question why it is being removed rather than being modified. Is AEMO advising that a 6801 can no longer be used in a meter churn scenario? AGL would like to seek confirmation from AEMO on the following scenario. Is it possible that a new (prospective) FRMP may engage the current RP to request a meter churn prior to becoming FRMP and the new metering providers will also be notified in advance who will notify the current meter providers in advance of the meter churn and that this may not be done	AEMO in consultation with the MSWG will consider reviewing scenarios and timelines for meter churn after final determination but prior to the effective date.

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			via MSATS initially? Notification could occur via email and also via B2B (if the LNSP is the RP) before the new FMRP raises a Change Role CATS Transaction in MSATS. In this case could it be possible that the new FRMP organises for the meter churn to occur in advance for the day after they become FRMP and then raises a retrospective change role in MSATS once FRMP to change the relevant roles after becoming FRMP?	
	Figure 1		**Energy Aust** Further work is required to provide clarity. FRMP in MSATS – if no = win customer in MSATS. Then back to start. Not No = End. First box in RP change initiate meter churn to Perform meter churn to be consistent. What about if site is 1-4 ? Or if going back to 5-6? More process boxes required or replicate for different meter changes. Clause 2.1.3 b) i) requires FRMP to make RP 'aware'. This may not be via a CR in MSATS yet Figure 1 requires a CR? The box needs be reworded to *Make RP aware of meter change.* New box after Perform meter churn – Raise CR for appropriate parties in MSATS. End is in RP not FRMP. Suggest numbering steps. AGL AGL supports a diagram being inserted to this procedure, however we do not support the diagram which has been inserted in its	AEMO in consultation with MSWG Agree with comments on consistency of "initiate" or "perform" meter churn. Disagree with suggested gaps on 1-4 going back to 5-6 is covered. i.e. is the FRMP also the RP = yes, then instigate meter churn. Diagram updated.

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			current state. AGL is supportive of figure 1 being discussed at the next MSWG meeting scheduled on the 9th December 2014, we would like to see time allocated to white board the various scenarios in order to confirm and agree if figure 1 is correct and what additional information is required. The current Meter Churn Procedures includes process maps for where Meter Churn can occur on the customer transfer date, Meter churn post MSATS customer transfer date using CR6800 and also CR6801. The proposed document updates removes these diagrams and we question why a meter churn could not occur on the customers transfer date or post MSATS customer transfer date using CR6800 and also CR6801 as long as the physical change of the meter did not occur prior to the transfer completing in the market. AGL questions why these process maps are being removed and questions whether if rather these process maps should be reviewed and. The only process map which should be removed is 'Meter Churn Prior to customer transfer date. Whilst AEMO has included a new diagram (figure 1) 'Meter Churn Process for FRMP', in comparison to the diagrams which are being removed it is our view that the replacement is lacking the overview required on how the end to end process works. As a result the process could be interpreted differently by participants. The process diagram advises 'initiate meter churn' and perform meter churn' with no	

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			detail of the processes which could be followed. Diagrams have been updated to the MDP Service Level Procedure and also to the MPB Service Level Procedure to cover various churn scenarios, the MBP procedures also have a table inserted to accompany the tasks given in the diagram which provides a high level overview of the process, whereas this is not captured in the Meter Churn Procedure for FRMPs. There also appears to be an end to end process missing across all three documents. The diagrams in the three separate documents all use different formats and do not link or flow on from one another, they do not capture the end to end process. Figure 1 shows that the process ends if you are not FRMP or RP, however we believe this is incorrect as a prospective FRMP could engage with the current RP to request for a meter churn to occur as the RP could initiate meter churn at any time which is outlined under 3.1.1 'Meter Churn can be initiated by the responsible person at any time. The diagram shows that a prospective FRMP needs to wait until becoming FRMP or RP before they can engage with the current RP to initiate the meter churn, the diagram shows that the process ends unless you are FRMP in MSATS.	

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			Responses provided in the first round of consultation advises that a prospective FRMP could commercially engage with the current RP prior to becoming the new FRMP and RP to initiate the meter churn. As long as the prospective FMRP have raised a prospective transfer and the transfer has passed the objection clearance period, and as long as the physical change of the meter does not occur until prior to the transfer completing in the market a prospective FRMP should be able to engage with the relevant participants to organise the meter churn in advance. It is in the interest of the customer if the prospective FRMP can align the meter churn to as close to the FRMP churn date as possible. An example of a scenario could be where a customer accepts a contract with a prospective FRMP with a future contract start date 1.12.2015, the prospective FRMP raises a transfer to become FRMP and RP (depends on the existing metering) from 1.12.2015, the current and new metering providers are engaged, along with the current RP prior to the transfer completing to organise the meter churn to occur after the day after the transfer is expected to complete for the 1.12.2015. The participant's responsible monitor to ensure it completes on the 1.12.2015 and the physical Meter churn occurs on the 3.12.2015. The diagram also shows that a FRMP could only raise a prospective CR providing the RP with advance notification of meter churn, however as AGL questioned above under 3 Obligations 3.1.4	

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			whether this is correct in entirety and we question whether the diagram should also cater for where the current FRMP can raise a retrospective change role in the scenario where e.g. Transfer competes with basic metering 1.12.2015, Meter churn occurs on 3.12.2015 to an interval meter and current FRMP raises CR6801 to align with the meter churn date 3.12.2015. Should the diagram show that a new (prospective FRMP) could engage the current RP to request a meter churn, as long as the physical meter churn does not occur until the prospective FRMP is the current FRMP. The diagram only shows that a current FRMP can engage with a RP to initiate meter churn. An RP can initiate meter churn at any time, the procedures do not appear to prevent a prospective FRMP or RP from engaging with the current FRMP or RP to initiate meter churn to align with the transfer date. **Endeavour** The diagram does not allow a FRMP to become the RP when the existing site has a type 1 - 4 meter and the FRMP is not the currently the RP. Suggest that the diagram is modified as shown below in appendix A. The FRMP has the right to become the RP should they wish. The diagram should reflect this. Two of the action boxes changed from 'perform meter churn' to 'initiate meter churn' to align with the text in the document. Also tidied up the diagram to make it easier	

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			to read.	
	3.2.1 Where a *financially responsible Market Participant* initiates *Meter Churn* and there is a change in *Metering Provider* as a result of the *Meter Churn*, the *financially responsible Market Participant* must:		**Endeavour** Where a *financially responsible Market Participant* initiates *Meter Churn* ~~and there is a change in *Metering Provider* as a result of the *Meter Churn*,~~ the *financially responsible Market Participant* must: Reworded to clarify that the clauses within 3.2.1 applies even when there is no change in the Meter Provider e.g. clause 3.2.1.a and 3.2.1.g.	AEMO in consultation with the MSWG agreed with the submission in principle. Minor amendments have been made to 3.2.1.
	New 3.2.1 b) viii. Whether the existing meter is a CT or WC meter.		**Endeavour** Knowing whether the existing metering is whole current or has current transformers would help to determine if an outage is required. AEMO stated in the draft determination that this requirement is covered in 3.2.1.b.vii. However clause 3.2.1.b.vii allows the FRMP to provide further information on what work to be done. The Metering Provider requires information that would assist them on how to perform the work. The provision of this extra information would benefit the customer and the industry by allowing better outage planning. It would also allow help participants to be complaint with NECF obligations such as providing outage notifications.	AEMO in consultation with the MSWG disagreed with the inclusion of this information as a must include. This information is not readily available to the FRMP to enable them to provide it.
	3.2.1 f		**AGL** Does this allow time for the change role	AEMO in consultation with the MSWG will consider

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	Ensure all role assignments in MSATS for the connection point are correct in accordance with MSATS procedures within 2 business days of the meter churn		transaction to complete? For example, post the meter churn you have 2 business days to raise the request to change the roles, however the roles in MSATS may be incorrect until the change role transaction completes in the market (REJ, REQ, OBJ, CAN, PEN, CAN) How does this clause work with clause 3.1.4 of the same procedures which advises that the FRMP must raise a prospective change request in MSATS nominating the roles prior to initiating the Meter Churn?	reviewing scenarios and timelines for meter churn after final determination but prior to the effective date. All role change "change requests" must be prospective as this provides the advance notice to the RP. The MDP has 2 days to provide an actual change date from the date the meter was read (reading the meter is part of the commissioning process for meter churn)
	MDP SLP – Section 8			
	8.1.2 Sections 8.1.3, 8.1.4, 8.1.5 and 8.1.6 detail the requirements that the *Metering Data Provider* must comply with for the management of *metering data* and the construction of the MDFF and *MDM data file* associated with *Meter Churn* events when a *metering installation* is changed from:		**Endeavour** Sections 8.1.3, 8.1.4, 8.1.5 and 8.1.6 detail the requirements that the *Metering Data Provider* must comply with for the management of *metering data* and the construction of the ~~MDFF and~~ *MDM data file* associated with *Meter Churn* events when a *metering installation* is changed from: Removed the reference to MDFF because later clauses and diagrams do not always specify how to construct a MDFF. AEMO stated in the draft determination that	AEMO in consultation with the MSWG referred this to the MDPWG to confirm the process for providing MDFF to participants. MDPWG confirmed that when a type 6 meter is involved in the meter churn process the provision and creation of the MDFF is different to the MDM file. AEMO have reworded this section. Added new 8.1.2 and

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			both MDM and MDFF files should be sent as per the scenarios. However the scenarios with accumulation meters only define how to construct the MDM data file and not the MDFF.	updated new 8.1.3. 8.1.2 The *Metering Data Provider* must comply with the MDFF requirements when constructing the MDFF associated with *Meter Churn* events for all scenarios. 8.1.3 Sections 8.1.4, 8.1.5, 8.1.6 and 8.1.7 detail the requirements that the *Metering Data Provider* must comply with for the management of *metering data* and the construction of the ~~MDFF and~~ *MDM data file* associated with *Meter Churn* events when a *metering installation* is changed from:
	8.1.3 For *Meter Churn* from a type 6 *metering installation* to a new type 6 *metering installation* (scenario 1): (a) The *Metering Data Provider* must have a process to ensure that: i. the final		**Endeavour** (a) The *Metering Data Provider* must have a process to ensure that: i. the final accumulation reading(s) from the removed type 6 *metering installation* is applied at the end of the *day* prior to the *Meter Churn* when sending MDM data; ii. the start reading(s) for a new type 6	AEMO in consultation with the MSWG advise changes to 8.1.2 & 8.1.3 suffice (see response to endeavours submission to 8.1.2 above) and there is no need for the extra wording proposed.

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	accumulation reading(s) from the removed type 6 *metering installation* is applied at the end of the *day* prior to the *Meter Churn*; ii. the start reading(s) for a new type 6 *metering installation* is applied at the start of the *day* of the *Meter Churn;* iii. *estimated metering data* is provided for any data streams made active as a result of the *Meter Churn*; and iv. Redundant data streams are made inactive in MSATS as a result of *Meter Churn*.		*metering installation* is applied at the start of the *day* of the *Meter Churn* when sending MDM data; and iii. *estimated metering data* is provided for any data streams made active as a result of the *Meter Churn,* Clarify that clauses 8.1.3.a.i & 8.1.3.a.ii is only applicable when sending metering data via MDM. AEMO stated in the draft determination that both MDM and MDFF files should be sent as per the scenarios. However these clauses only define how to construct the MDM data file and not the MDFF.	
	8.1.4 a) i For *Meter Churn* from a type 6 *metering installation* to new type 1, 2, 3, 4, or 5 *metering installation* (scenario 2): (a) The *Metering Data Provider*		**Endeavour** the final accumulation reading(s) from the removed type 6 *metering installation* is applied at the end of the *day* prior to the *Meter Churn* when sending MDM data; and	AEMO in consultation with the MSWG advise changes to 8.1.2 & 8.1.3 suffice (see response to endeavours submission to 8.1.2 above) and there is no need for the extra wording proposed.

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	must have a process to ensure that: i. the final accumulation reading(s) from the removed type 6 *metering installation* is applied at the end of the *day* prior to the *Meter Churn*; and		Clarify that clause 8.1.4.a.i is only applicable when sending metering data via MDM. AEMO stated in the draft determination that both MDM and MDFF files should be sent as per the scenarios. However these clauses only define how to construct the MDM data file and not the MDFF.	
	8.1.5 a) iii For *Meter Churn* from a type 1, 2, 3, 4, or 5 *metering installation* to new type 6 *metering installation* (scenario 3): (a) For jurisdictions where reversion from a type 1, 2, 3, 4 or 5 *metering installation* to a type 6 *metering installation* is permitted, the *Metering Data Provider* must have a process to ensure that: i. the final reading(s) from the removed type 1, 2, 3, 4, or 5 *metering installation* ceases at the end of the *day* of the *Meter Churn*;		**Endeavour** the start reading(s) reading for the new type 6 *metering installation* is applied at the start of the *day* following the *day* of the *Meter Churn* when sending MDM data. Clarify that clause 8.1.5.a.iii is only applicable when sending metering data via MDM. AEMO stated in the draft determination that both MDM and MDFF files should be sent as per the scenarios. However these clauses only define how to construct the MDM data file and not the MDFF.	AEMO in consultation with the MSWG advise changes to 8.1.2 & 8.1.3 suffice (see response to endeavours submission to 8.1.2 above) and there is no need for the extra wording proposed.

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	ii. the *metering data* for the period of the *Meter Churn day* between commissioning of the new *metering installation* and the end of the *day* of the *Meter Churn* is provided as zeroes with a quality flag of F; and iii. the start reading(s) for the new type 6 *metering installation* is applied at the start of the *day* following the *day* of the *Meter Churn*.			
	8.1.6 (c) change to the clause (c) Where the *Metering Data Provider* is changing as a result of the *Meter Churn* and there is a delay in the change of the *Metering Data Provider* role in MSATS: i. the *Metering Data Provider* must make the data stream inactive in MSATS for the removed meter with an effective start date of the *Meter Churn* day. ~~i. the old Metering Data Provider must provide substituted metering data in~~		**AGL** AGL would like (i) to be further discussed at the next MSWG scheduled 9th December 2014 as part of the consultation review discussions. In particular to seek confirmation on what constitutes a delay? When would the data stream become inactive? The timing is important for the impacted FRMP/RP to understand to identify impacts with data processing. **Ausgrid**	AEMO in consultation with the MSWG. Updated 8.1.7(c) wording in the document below. (c) Where the *Metering Data Provider* is changing as a result of the *Meter Churn* ~~and there is a delay in the change of the *Metering Data Provider* role in~~

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
	~~accordance with the metrology procedure: Part B with a quality flag of 'S' and a reason code of 37 (meter under churn) in the MDFF until the new Metering Data Provider becomes the Metering Data Provider in MSATS; and~~ ~~ii. the new Metering Data Provider, when it becomes the Metering Data Provider in MSATS, must provide actual metering data for the period of substitution in (c)(i) above.~~		Ausgrid suggests that the MDP should be able to adopt either process:- i. To deactivate the data streams in accordance with the proposed change; OR ii. Leave the data streams active and provide substituted data to AEMO and market participants until the transfer of service provider(s) is complete. Where the NMI(s) concerned have very high consumption (or generation), the exclusion of any data for such NMIs from the market could have an adverse impact on settlements. For example, if the subject NMI(s) where classified as wholesale and the meters were exchanged on a Friday, both Friday's and Saturday's data would be excluded from settlements. If AEMO elects to adopt only one process, then option (ii) is the only acceptable approach. **Energy Aust** EnergyAustralia is concerned that making the data stream inactive in does not reflect there is usage occurring at the site. There is potential if there are hold ups to the new MDP updating data streams the LR will be financially impacted at settlements, the LR will have no recourse to ensure the FRMP and MDP are undertaking their requirements in a timely fashion. This would be of critical concern in a high price period.	~~MSATS:~~ ~~i. the *Metering Data Provider* must make the data stream inactive in MSATS for the removed meter with an effective start date of the *Meter Churn* day.~~ i. the old *Metering Data Provider* must provide *substituted metering data* in accordance with the *metrology procedure*: Part B with a quality flag of 'S' and a reason code of 37 (meter under churn) in the MDFF until the new *Metering Data Provider* becomes the *Metering Data Provider* in MSATS; and ii. the new *Metering Data Provider*, when it becomes the *Metering Data Provider* in MSATS, must provide actual *metering data* for the period of *substitution* in (c)(i) above.

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
			It is noted in the combined MDP Participant Response Pack Ausgrid also made comments on 8.1.6 (c) which AEMO accepted and the two clauses where retained. **ERM** We do not believe it is appropriate for the data stream for the existing meter to be made inactive from the meter churn day, and for the old MDP to have no obligations to provide substituted data in instances where there is a delay in updating MSATS. Until MSATS is updated, the old MDP remains responsible for the provision of metering data at the site, and therefore must ensure that at least substitute data is available. There are a number of situations that could lead to a delay in MSATS being updated with the new MDP. These include where the meter was replaced out of business hours, where there is a comms failure, or simply due to the standard timeframes for certain participants to complete their business processes. Further, the meter churn day cannot always be correctly identified by the old MDP when a meter is replaced out of business hours, there is a comms failure, or processes otherwise break down. The transaction to effect the role change would be a CR6800 – independent of change of retailer. While this transaction requires a proposed date to be elected, this date simply represents the earliest date that	

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
			MSATS could be updated with the new MDP, and therefore does not provide any certainty to the old MDP of the day that the new MDP will take on responsibility for the site. In instances where the meter churn day does not align with the date that MSATS is updated, there will be a period of time where the old MDP will be responsible for the site, but under the proposed change, would have made the data stream inactive. The only participant able to provide data for this period is the old MDP, who has the site history to provide substituted data. We do not believe the deleted clauses (i) and (ii) place onerous obligations on MDPs, and considering the value of substituted data in instances where the process breaks down, they should be retained. **Endeavour** Remove the lead in paragraph (see suggested wording below) because it is confusing and ineffective. It suggests that initially the data stream is left as active and when there is a delay in the change of MDP then the data stream is be made inactive. However it does not define what is meant by 'delay' is this 2 business days from the meter churn day or longer? By leaving the data stream active for a period of time it would then obligate the old MDP to substitute and deliver metering data for an interim period of time. This would allow current issues with the meter churn prior to FRMP role changes to perpetuate	

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
			and it does not address the real issue which in this case is the delay in MDP role change. Once a new meter is installed and a new MDP is reading the new meter then there should be no obligation on the old MDP to manage metering data from that point onwards – this is one of the key principles of the meter churn design. The existing clause does not support this key principle and attempts to address an issue by placing extra obligation on a party (the old MDP) that has no control on the MDP role change. There should be no reason for a delay in making the MDP role change – even if the new MDP is unable to read the new meter due to operational difficulties then this is not a reason for delaying the MDP role change because it would be the new MDP's responsibility to substitute the metering data as per the Metrology Procedure. If required AEMO should help to make the MDP role change in MSATS using CR5101, which would provide a better outcome. **Origin** For clarity add "new' Metering Data Provider: i. the new *Metering Data Provider* must make the data stream inactive in MSATS for the removed meter with an effective start date of the *Meter Churn* day.	
	8.1.6 (a) iii and 8.1.6 (a) x		**Endeavour**	AEMO in consultation with the MSWG has updated

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
	For *Meter Churn* from a type 1, 2, 3, 4, or 5 *metering installation* to new type 1, 2, 3, 4, or 5 *metering installation* (scenario 4): (a) The *Metering Data Provider* must have a process to ensure that: i. the final reading(s) from the removed type 1, 2, 3, 4, or 5 *metering installation* is collected up to the removal of the old *metering installation* on the *day* of the *Meter Churn*; ii. the *metering data* for the new type 1, 2, 3, 4, or 5 *metering installation* commences at the start of the day on the *day* of the *Meter Churn*; iii. the *Metering Data Provider,* related to the new *metering installation,* must obtain *metering data* for the period of the *Meter Churn day* between the start of the *Meter Churn day*		~~.1.6.a.iii the *Metering Data Provider,* related to the new *metering installation,* must obtain *metering data* for the period of the *Meter Churn day* between the start of the *Meter Churn day* and the removal of the old *metering installation* from the *Metering Data Provider* related to the old *metering installation* and combine it with the *metering data* for the period of the *Meter Churn day* between the removal of the old *metering installation* up to the end of the *Meter Churn day*. The *Metering Data Provider* related to the new *metering installation* must deliver *metering data* for the whole *day* of *Meter Churn.*~~ 8.1.6.a.iii the *Metering Data Provider,* related to the new *metering installation,* must obtain *metering data* for the period between the start of the *Meter Churn day* and the removal of the old *metering installation* from the *Metering Data Provider* related to the old *metering installation.* 8.1.6.a.iv the *Metering Data Provider,* related to the new *metering installation,* must combine *metering data* from the old *metering installation* and the new *metering installation* for the *Meter Churn day.*	wording in the document as follows iii. the *Metering Data Provider,* related to the new *metering installation,* must obtain *metering data* for the period of the *Meter Churn day* between the start of the *Meter Churn day* and the removal of the old *metering installation* from the *Metering Data Provider* related to the old *metering installation*. iv. The *Metering Data Provider* related to the new *metering installation* must combine the *metering data* from the old *metering installation* and the new *metering installation* for the *Meter Churn day*. The *Metering Data Provider* related to the new *metering installation* must deliver *metering data* for the whole *day* of *Meter Churn*.

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
	and the removal of the old *metering installation* from the *Metering Data Provider* related to the old *metering installation* and combine it with the *metering data* for the period of the *Meter Churn day* between the removal of the old *metering installation* up to the end of the *Meter Churn day*. The *Metering Data Provider* related to the new *metering installation* must deliver *metering data* for the whole *day* of *Meter Churn*. iv. The *Metering Data Provider* related to the old *metering installation* must release the part-day *metering data* to the new *Metering Data Provider* within 2 business days of the *Meter Churn*; v. where *Meter Churn* results in a change to the recording of *metering data* from 15		8.1.6.a.v the *Metering Data Provider*, related to the new *metering installation*, must create final *substituted metering data* for the period between the existing *metering installation* being removed and the commissioning of the new *metering installation*. 8.1.6.vi the *Metering Data Provider* related to the new *metering installation* must deliver *metering data* for the whole *day* of *Meter Churn* Reworded and moved clauses to make the obligations easier to read and follow a logical order. Split the existing clause 8.1.6.a.iii into three clauses with slight rewording to make the sentences easier to read. The new clauses are now 8.1.6.a.iii, 8.1.6.a.iv and 8.1.6.a.vi. Moved existing clause 8.1.6.a.x to 8.1.6.a.v without any word changes.	

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
	minute to 30 minute intervals, the 15 minute intervals of *metering data* from the start of the *Meter Churn day* until the commissioning of the new *metering installation* are to be aggregated to form 30 minute *interval metering data*; vi. where *Meter Churn* results in a change to the recording of *metering data* from 30 minute to 15 minute intervals, the 15 minute intervals of *metering data* from the commissioning of the new *metering installation* to the end of the *Meter Churn day* are to be aggregated to form 30 minute *interval metering data*; vii. *estimated metering data* is provided for any data streams made active as a result of the *Meter Churn,* for a new type 5 *metering installation*;			

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
	viii. where *Meter Churn* results in a data stream(s) being made active, the *Metering Data Provider* related to the new *metering installation* must provide *metering data* from the start of the *day* to the commissioning of the new *metering installation* by providing zeroes with a quality flag of F; and ix. where *Meter Churn* results in a data stream(s) being made inactive, the *Metering Data Provider* related to the new *metering installation* must provide *metering data* from the commissioning of the new *metering* installation to the end of the *day* by providing zeroes with a quality flag of F. x. the Metering Data Provider, related to the new *metering installation*, must			

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
	create final *substituted metering data* for the period between the existing *metering installation* being removed and the commissioning of the new *metering installation*			
	8.1.6 (b) i for the removal of type 1, 2, 3, or 4 *metering equipment,* the old *Metering Data Provider* must provide the new *Metering Data Provider* with the final metering data from the removed *metering equipment* in accordance with section 6 of this Procedure;		**Ausgrid** This is a duplicate of clause 8.1.6 (a) (iv). Suggest deletion of clause 8.1.6 (a) (iv). 8.1.6 (a) (iv) The *Metering Data Provider* related to the old *metering installation* must release the part-day *metering data* to the new *Metering Data Provider* within 2 business days of the *Meter Churn*; **Endeavour** Clause 8.1.6.b.i is redundant due to the new clause 8.1.6.a.iv Clause 8.1.6.a.iv should be moved to section 8.1.6.b because it is only applicable as per the lead in paragraph in clause 8.1.6.b **United Energy** 8.1.6 UE agrees that the old MDP should release part day data in a timely manner to the new MDP. UE query the practicality of	AEMO in consultation with the MSWG agreed that the clauses are duplicated accordingly cl 8.1.7 (a)(iv) (previously cl 8.1.6 (a)(iv)) was deleted.

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
			this if there is any reliance on the following activities being completed within 2 business days of the exchange in the field - a meter return to store, registration in store and reading/downloading the data, uploading and processing into IT systems and forwarding to the new MDP. Meters may be returned to store but this is unlikely to occur on the day of or the day following the meter churn. This places a heavy reliance on the MDP undertaking a last interrogation just before the old meter is removed.	
	New Section Appendix A		**Endeavour** Suggest that the four diagrams in section 8 are repeated here as examples with dates and times shown in the diagrams. There were some confusion on how to read the diagrams and examples with dates and times shown would clarify any misunderstanding. AEMO stated in the draft determination that the diagrams and the text are complete and that a new appendix is not required. However experience has shown us that having examples provides better clarity and reduces complaints and enquires due to different interpretations.	AEMO in consultation with the MSWG referred this to the MDPWG to confirm whether the diagrams would be more beneficial having dates (example) provided. MDPWG agreed that the dates would be beneficial and would like the diagrams to be the main diagrams and not an appendix to the document. AEMO updated the diagrams.
	Section 6		**Ausgrid** Data delivery requirements should include	AEMO disagree this clause is specifically related to the incoming retailer. There are

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
	6.11.5 The *Metering Data Provider* must provide *metering data* to the *financially responsible Market Participant* within two *business days* of receiving a completed notification of a change of *financially responsible Market Participant*, including *estimated metering data*, for a type 5, 6 or 7 *metering installation.*		delivery of data to AEMO and LNSPs.	other clauses that cover AEMO and LNSP's.
	MPB SLP			
	4.11 Meter Change Process		**United Energy** The current paperwork and email trail meter exchange process will need to be reviewed for mass market. These will not be sustainable at any volume.	AEMO considers that there will be an opportunity for interested parties to provide input to the AEMC rule change on metering competition which is due for consultation in 2015.
	Section 4 4.11.1 The *Metering Provider* must only undertake meter churn when the request to do so has been provided by a *responsible person* or the *financially responsible Market Participant* for the Market Load in MSATS and: a) they are the Meter Provider in MSATS, or b) there is a change request nominating		**AGL** AGL questions b) and how this will work in the scenario if participants commercially agree to organise for the meter churn request to be raised prior to the new FMRP becoming the FMRP and or RP (as long as the physical churn of the meter doesn't occur prior to the new FRMP becoming the FRMP or a change in RP). This appears to be suggesting that the new FRMP has to wait until the transfer completes and then	AEMO in consultation with the MSWG agrees in principle with the need to acknowledge an authorization to conduct meter churn, rather than just via a request. Clause changed as follows: 4.11.1 The *Metering*

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
	them as the *Metering Provider* and the change request has passed the objection logging period in accordance with the MSATS Procedures.		raise a prospective change role transaction to change the service providers and wait until the objection clearance period of 5 business days' expires before undertaking the meter churn which will further push out the meter churn process further. Does the new FRMP need to take into consideration the objection clearance period when requesting a meter churn date? The B2B Procedure for Service Orders advises for an Adds and Alts there is no notice period. This comment also ties into the question AGL raised above 3 Obligations 3.1.4 of the Meter Churn Procedure for FRMPs and 3 Obligations Figure 1 Meter churn Process for FRMP if a retrospective CATS change role transaction could occur. **Ausgrid** Meter Churn can be initiated without a request from the RP or FRMP. For example, as a result of a meter failure or fault. The SLP needs to allow the MP to initiate meter churn for any reason associated with emergency or routine meter rollouts.	*Provider* must only undertake meter churn when they are authorised to do ~~so request to do so has been provided~~ by a *responsible person* or the *financially responsible Market Participant* for the Market Load in MSATS and: a) they are the *Metering Provider* in MSATS, or b) there is a change request nominating them as the *Metering Provider* and the change request has passed the objection logging period in accordance with the MSATS Procedures.

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
	4.11.2 Prior to conducting *meter churn* from a type 1, 2, 3 or 4 *metering installation* to a type 1, 2, 3, 4 or 5 *metering installation* (and to a type 6 subject to the jurisdictional reversion policy in the *metrology procedure*), the *Metering Provider* must make reasonable endeavours to contact the current *Metering Data Provider*		**AGL** To add clarity to the reading of this clause, AGL would like to suggest that new or prospective is placed in front of Metering Provider. Prior to conducting meter churn from a type 1, 2, 3 or 4 metering installation to a type 1, 2, 3, 4 or 5 metering installation (and to a type 6 subject to the jurisdictional reversion policy in the metrology procedure), the new Metering Provider must make reasonable endeavours to contact the current Metering Data Provider	AEMO in consultation with the MSWG believe that the clause works generically – i.e. the metering provider performing the action is committed to this obligation. Think that the suggested insertion doesn't add clarity for the MP.
	4.11.3 Prior to conducting *meter churn* from a type 5 or 6 *metering installation* to a type 1, 2, 3, or 4 *metering installation*, the *Metering Provider*		**AGL** To add clarity to the reading of this clause, AGL would like to suggest that new or prospective is placed in front of Metering	AEMO in consultation with the MSWG believe that the clause works generically without the need for extra text.

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
	must make reasonable endeavours to contact the current *Metering Provider* and/or *Local Network Service Provider* and:		Provider. Prior to conducting meter churn from a type 5 or 6 metering installation to a type 1, 2, 3, or 4 metering installation, the new Metering Provider must make reasonable endeavours to contact the current Metering Provider and/or Local Network Service Provider and: **United Energy** In 4.11.3 there is no mention of where the LNSP may need to advise their requirements of the metering installation. The LNSP should have the opportunity to continue their network or customer arrangements at that site eg timeswitch for off peak load, 15 min or 5 min data, smart meter settings etc. LNSP requirements need to be considered in the NER, MSATS or SLP framework. The current MSATS notifications to the LNSP of change of RP will need to be reviewed to ensure the long term interests of customers are maintained.	Regarding the requirements of the LNSP, the submission is noted however, AEMO do not believe that it is within the scope of this procedure.
	4.11.6 The *Metering Provider* must have a process to ensure that MSATS is updated as follows: for a type 6 to a type 1, 2, 3, 4, 5, or 6 *Meter Churn* meters are:		**Endeavour** 4.11.6 The *Metering Provider,* related to the old *metering installation,* must have a process to ensure that MSATS is updated as follows: a) for a type 6 to a type 1, 2, 3, 4, 5, or 6 *Meter Churn* meters are removed in MSATS, using the day of the physical	AEMO to reword using Dino's wording but keep the same lead in paragraph with changes. 4.11.6 The *Metering Provider* under taking

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
	i. removed in MSATS on the day of the physical removal of the meter(s). i. installed in MSATS on the day of the physical installation of the meter(s). for a type 1, 2, 3, 4, or 5 to a type 6 *Meter Churn* meters are: i. removed in MSATS on the day after the physical removal of the meter(s). ii. installed in MSATS on the day after the physical installation of the meter(s). for a type 1, 2, 3, 4, or 5 to a type 1, 2, 3, 4, or 5 *Meter Churn* meters are: i. removed in MSATS on the day of the physical removal of the meter(s). ii. installed in MSATS on the day of the physical installation of the meter(s).		removal of the meter(s) as the removal date. b) for a type 1, 2, 3, 4, or 5 to a type 6 *Meter Churn* meters are removed in MSATS, using the day after the physical removal of the meter(s) as the removal date. c) for a type 1, 2, 3, 4, or 5 to a type 1, 2, 3, 4, or 5 *Meter Churn* meters are removed in MSATS, using the day of the physical removal of the meter(s) as the removal date. 4.11.7 The *Metering Provider,* related to the new *metering installation,* must have a process to ensure that MSATS is updated as follows: a) for a type 6 to a type 1, 2, 3, 4, 5, or 6 *Meter Churn* meters are installed in MSATS, using the day of the physical installation of the meter(s) as the install date. b) for a type 1, 2, 3, 4, or 5 to a type 6 *Meter Churn* meters are installed in MSATS, using the day after the physical installation of the meter(s) as the install date. c) for a type 1, 2, 3, 4, or 5 to a type 1, 2, 3, 4, or 5 *Meter Churn* meters are installed in MSATS, using the day of the physical re installation of the meter(s) as the install date. d) redundant meters are removed from MSATS as a result of *Meter Churn.*	churn must have a process to ensure that MSATS is updated as follows: 4.11.6 The Metering Provider must have a process to ensure that MSATS is updated as follows: a) for a type 6 to a type 1, 2, 3, 4, 5, or 6 Meter Churn meters are: i. removed in MSATS using the day of the physical removal of the meter(s) as the removal date.on the day of the physical removal of the meter(s). ~~on the day of the physical removal of the meter(s).~~ ii. installed in MSATS using the day of the physical installation of the meter(s) as the install date. on the day of the physical installation of the meter(s). ~~on the day of the physical installation of the meter(s).~~ b) for a type 1, 2, 3, 4, or 5 to a type 6 Meter Churn meters are: i. removed in MSATS using the day after the physical removal of the meter(s) as the removal date. on the day after the

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
			Suggested extra wording to clarify the effective start date of the changes in MSATS and which Metering Provider is obligated to perform each activity.	physical removal of the meter(s). ~~on the day after the physical removal of the meter(s).~~ ii. installed in MSATS using the day after the physical installation of the meter(s) as the install date. on the day after the physical installation of the meter(s). ~~on the day after the physical installation of the meter(s).~~ c) for a type 1, 2, 3, 4, or 5 to a type 1, 2, 3, 4, or 5 Meter Churn meters are: i. removed in MSATS using the day of the physical removal of the meter(s) as the removal date. on the day of the physical removal of the meter(s). ~~on the day of the physical removal of the meter(s).~~ ii. installed in MSATS using the day of the physical re installation of the meter(s) as the install date.on the day of the physical installation of the meter(s). ~~on the day of the physical installation of the meter(s).~~ d) all redundant meters are removed from MSATS as a result of Meter

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
				Churn.
			United Energy 4.12.1 task 5. It would be useful to be clear on what information is available from where and to clearly specify the role obligations. MSATS should be the first and most efficient place to extract information, followed by current MP and lastly the LNSP. UE support the comments made by AusNet Services in the last round of consultation.	AEMO note that although this section was not in the scope, and therefore not part of this consultation, AEMO have noted feedback to be included when AEMO next perform a full review of the MPB SLP
			United Energy Fig 1 - AEMO advise in their response that the methods of notification between each of the roles on tasks 3 and 5 in Fig 1 are clarified in 4.11. It would be useful if the methods of notification to each of the roles in these tasks were clarified eg phone or MSATS notifications.	AEMO note that although this section was not in the scope, and therefore not part of this consultation, AEMO have noted feedback to be included when AEMO next perform a full review of the MPB SLP
	General Comments			
	General Comment – B2B Procedures		**AGL** Can AEMO please confirm if changes are required to B2B Procedure – Service Order Process V2.2? Please Refer to Figure 10 – Service Order Summary – Prospective Retailer. This figure shows that a new retailer (prospective retailer) could request for a	AEMO will review this and if changes are required these will be reviewed with consideration to the effective date.

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
			meter adds and alteration or a meter re-configuration. AEMO's high level process documented in figure 1 of the Meter Churn Procedure advises that the process ends if the FRMP is not FRMP in MSATS. One of the scenarios in which AGL wants to seek confirmation on from AEMO as part of the scenario mapping exercise we recommend occurs is where a customer has a type 5 meter and the prospective FRMP has contracted a prospective customer who wants to initiate a meter churn for a prospective date and wants to change the meter to an interval meter to support their usage requirements. If the LNSP is the RP in this scenario raising the SO would be notifying them in advance of the request, and as long as the new FRMP have raised a prospective transfer and it has passed the objection clearance period the current FRMP and RP will also have visibility of the transfer. The new FRMP should be able to raise a prospective Service Order for a proposed date with a date set for after they are expecting to become FRMP (e.g. transfer raised for the 1.12.2015 with read type NI new interval, nominating to become RP, service order raised for 3.12.2015) as long as the physical churn of the meter does not occur until after the prospective FRMP has become FRMP. The relevant participants will need to monitor to ensure the transfer completes and if it doesn't complete for some reason they will need to ensure the	

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
			physical meter churn does not complete until the FRMP role changes. If a Service Order of this type can no longer be raised prior to becoming FMRP, Is AEMO expecting that the LSNP will have validations put in place to reject a service order of this type by a prospective FRMP? What rejection code should be used? AEMO's figure 1 in the meter churn document suggest that the prospective FRMP can take no action until they are FRMP, this includes initiating the meter churn.	
	General Comment - CATS		**AGL** Can AEMO please confirm if changes are required to MSATS Procedure – CATS Procedure Principles and Obligations V4.1 Refer to 4.13 Read Type Code Table 4M and Table 4-N which shows a new FRMP (prospective FRMP) could raise a transfer with Read Type Code NI – New interval Meter. Description of Code advises this applies to type 1-5 metering installations and type 6 metering installations that are being replaced with an interval meter. Read Type Code is only required for Transfers raised by new FRMP's. AGL would like AEMO to confirm if the new FRMP (prospective) approaches the current RP and service providers prior to becoming	AEMO will review this and if changes are required these will be reviewed with consideration to the effective date.

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
			FRMP to organise for a meter churn to occur on the transfer date can the prospective FRMP still raise a transfer with this read type? If this read type can no longer be used what will happen to the transfer?	
	General comments		**United Energy** UE note the number of comments suggesting that the proposed changes to the various procedures are not in consumers interests and will create a barrier to efficient meter churn. There has been no consideration that if the retailer is not the FRMP, then the new retailer is impacting the old retailer and the old customer which some may consider is also	

EI	Existing Remotely-Read Interval Meter	Advice from the new FRMP to the MDP that there is an existing remotely-read interval meter or meters at the connection point and that the existing meters will continue to be used after the transfer. Applies to type 1 to 4 metering installations only.
NI	New Interval Meter	Advice from the new FRMP to the MDP that a new interval meter is to be installed at the site as part of the process to complete this transfer. If this is an existing active connection point and therefore there is already a meter, there will need to be a final read for the existing meter. Applies to type 1 to 5 metering installations and type 6 metering installations that are being

Code	Name of code	Description of code
		replaced with an interval meter.

Table 4-N – Valid Combinations of Read Type Codes, Metering Installation Codes and Change Reason Codes

CR Code		1000		1010, 102X, 1040		1030		All CR Codes	
Metering Installation Code		BASIC	MRIM	BASIC	MRIM	BASIC	MRIM	COMMSx	UMCP
Read Type Code									
NS	Next Scheduled Read Date	Yes	Yes	No	No	No	No	No	No
RR	Next Read Date	Yes	Yes	No	No	Yes	Yes	No	No
SP	Special Read	Yes	Yes	No	No	Yes	Yes	No	No
ER	Estimated Read	Yes	Yes	Yes	No	Yes	Yes	No	No
CR	Consumer Read	Yes	No	No	No	No	No	No	No
PR	Previous Read Date	No	No	Yes	Yes	No	No	No	No
UM	Unmetered Connection Pt	No	No	No	No	No	No	No	Yes
EI	Existing Interval Meter	No	No	No	No	No	No	Yes	No
NI	New Interval Meter	Yes	Yes	No	No	Yes	Yes	Yes	No
NB	Future Move In (Basic)	No	No	No	No	Yes	Yes	No	No

Note: 1080 is the same as 1000, 1081 is the same as 1010, 1083 is the same as 1030, and 1084 is the same as 1040.
Note: 102X refers to 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028 and 1029.
Note: COMMSx refers to COMMS1, COMMS2, COMMS3, COMMS4.

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			not appropriate or in that customers interests. Where the customer remains insitu they may feel more comfortable and accept that their current/old retail contract is impacted. Retailers and a number of other submissions (brokers and competitive metering providers) note that the gap period is complex, creates confusion for customers, impacts customers benefits, requires additional contract negotiation to gain the data and services during this gap period etc. Essentially the gap period can occur before or after the transfer date, the gap period is still there. The gap period is complex for all parties and there are a significant number of hidden costs. It is important that AEMO ensure that the role obligations and processes are clear and that for greater levels of churn there is an ability to increase the levels of automation. The paperwork returning from the field etc at higher volumes of field work is not going to lead to good outcomes across the market. The gap period will not be removed but efforts need to be made to reduce the gap period and the impacts on the old/current customer/retailer/network relationships. There would be benefit in the AEMC metering rule changes making the policy positions in respect of the interruption/continuity of old customer contracts as there may need to be some consideration in the NER and/or NERR. Ideally any rule changes made to this effect should not be overly prescriptive but seek to preserve the rights of parties and enable	

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			the procedures to detail efficient mechanism and processes to reduce the gap period to a manageable and robust level. In addition UE is interested to ensure that existing contracts with customers are able to be preserved across these changes, at no point do the meter churn procedures consider the impact on network tariff and network data and the continuity of these arrangements. As noted by Energy 4 Business, LNSPs are not interested in uncertainty of network charging for this period due to the uncertainty that this creates as this just leads to increased billing issues and disputes and ultimately cost to customers.	
	General comments		**United Energy** AEMO considers that the requirements of the NER with respect to meter churn do not preclude a third party from obtaining customers data from the existing provider. UE query where in the NER it suggests that the existing service providers (MP/MDP) need to provide this data to third parties. The recent AEMC rule change on customer access to information decided against third parties accessing this data from MP/MDP roles as these roles cannot readily verify the customer.	AEMO have not suggested that there are any additional obligations on parties other than those stated in the NER.
	General comments		**United Energy** E4B note that they will be forced to negotiate with a range of MPs to access data during the gap period which will lead to increased costs. Network services will similarly for LNSPs need to be renegotiated	AEMO note United Energy's comments. The outcome of the changes to the meter churn procedures will be provided to the BMRG to consider

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			with the new service providers and which is likely to lead to increased costs. A proper functioning competitive market will sort these issues out on the retail side. UE support comments made by AGL and SP that the meter churn process should be transparent and not left open to differing interpretation by parties. The role obligations should also be clear and the method of interaction. Where diagrams are useful for industry to ensure a common agreed processes they should be part of the procedure. BDPIP process flow diagrams are not part of the regulatory framework and would result in a change of scope late in this consultation process.	necessary changes to the BDPIP diagrams.