DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK

METER CHURN PACKAGE

***Participant**: AGL*

***Completion Date**: 24th October 2014*

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1. Proposed Changes

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NOTE: No proposed changes have been populated please refer to mapping documents and change marked procedures. Please complete where necessary

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

A. Proposed Changes to the Meter Churn Package

Item	Description	Category	Participant Comments
1	**PROPOSED/ REQUESTED CHANGES**		
Clause 1.1 Of the Meter Churn Procedure	Effective Date: December 2014	Procedure only	AGL acknowledges AEMO's intent to address the inconsistencies between the National Electricity Rules and AEMO's Meter Churn Procedures. AGL however does not consider this change purely a procedural change, therefore we do not find ourselves in a position to support the proposed effective date which AEMO has put forward as 31st December 2014. AEMO advised at a RP Workshop in July 2014 the following; • AEMO was unable to find any evidence or support to justify challenging the NER requirements • AEMO provided summary to the AER and requested confirmation of "no action", with sufficient time for AEMO to rectify the procedures in accordance with the NER consultation procedures (Feb 2014). It is in AGL's opinion that the above only takes into consideration AEMO's views and time AEMO requires to make procedural changes, it does not take into consideration the views of participants or consider the time required to make and deliver changes by participants. In particular changes will be required to AGL's system and processes which are largely automated, AGL has been operating in accordance to AEMO's

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			existing Meter Churn Procedures for many years. AGL also anticipates contractual arrangements will be required and time to review existing contractual arrangements and address any inconsistencies will be necessary. AEMO's draft determination is scheduled to be released on the 9th December 2014 with the final determination published and effective as soon as 31st December 2014. In AGL's opinion this does not provide participants with adequate time to schedule the necessary IT changes, design and build, run changes through several test cycles and roll out the changes to our customer personal all in time to deliver by AEMO's proposed effective date. AGL recommends AEMO considers postponing the effective date of the procedures to provide time to determine a solution that is consistent with the rules and provide time for participants to assess and deliver the changes. AGL proposes AEMO considers postponing the effective date of the procedures to September 2015.
Clauses 1.1.2 1.3.2 of the Meter Churn Procedures And Removed Diagram Meter Churn on customer transfer date in the Meter Churn	1.1.2 The *responsible person* can initiate *Meter Churn* at any time. Where the *financially responsible Market Participant* is not the *responsible person*, the *financially responsible Market Participant* for the *market load* may request the *responsible person* perform *Meter Churn* in line with the *B2B Procedures*. And 1.3.2 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.	Procedure only	AGL would like to question in particular for type 1-4 scenarios where the incoming Financially Responsible Market Participant intends on becoming the new Responsible Person (where they select to become FRMP and RP as part of the transfer request) and the customer wants the meter churn to occur on the transfer date. Does Chapter 7 of the National Electricity Rules under 7.2.5 Role of the responsible person (e) and (2) provide ability for the incoming responsible person to at least engage with its selected service providers prior to becoming FRMP and RP to request for Meter Churn to occur on the transfer proposed date? Providing the responsible person has been made aware of the Meter Churn in advance, rather than having to wait to become FRMP and RP before being able to engage with its selected

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Procedure And Clause 4.8 of the SLP MPB Services	And 4.8.1 The Metering Provider must only undertake meter churn when the request to do so has been provided by a responsible person, or a financially responsible Market Participant in accordance with the FRMP Churn Procedure.		service providers to request for Meter Churn. As per Version 65 of the National Electricity Rules (Chapter 7) page 917, it advises that the MSATS Procedures may specific that an incoming responsible person is responsible for the metering installation on either the day the transfer completes from one FRMP to another FRMP or any other day. **7.2.5 Role of the responsible person** (e) The *Market Settlements and Transfer Solution Procedures* may specify that an incoming *responsible person* is responsible for the *metering installation*: (1) on the day that a *market load* transfers from one *financially responsible Market Participant* to another *financially responsible Market Participant* for the period within that day; or (2) on any other day. If as the incoming Responsible Person we could at least engage with both the existing service providers and prospective service providers, including the existing responsible person once the transfer has been raised in MSATS, post the objection clearance period (status of PEN) to raise a meter churn request to occur on the proposed transfer date (where possible) this may provide the ability for service providers to forward plan and to reduce the transitional period and misalignment between the transfer date, customer's retail contract and meter churn date for scenarios where it may be possible to co-ordinate and complete the meter churn on the transfer date. AEMO is proposing to remove the diagram from the Meter Churn Procedure for where Meter Churn can occur on the customers transfer date, we propose to retain the ability for Meter Churn to occur at least on the transfer date in the scenario mentioned above. AEMO's reference to 7.3.4 (m) of the Rules appears to also reference only type 5 or Type metering installations. There is concern internally in regards to exits fees and with on passing fees

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			to customers where existing metering is transferred, in particular where negotiation with customers non- preferred service providers are anticipated. In addition there is concern with being exposed to meter compliance errors we may migrate with existing metering and with meter providers who are not the customers preferred meter provider, inheriting a site with an error causing a rebill and or meter investigation which untimely may result in a bad customer experience for the customer when the customer receives their first retail bill from their new FRMP.
Clauses 1.1.3 And 3.1 Of the Meter Churn Procedures And Removed diagrams of the Meter Churn Procedures And The new diagrams placed in the Service Level Procedures for Meter Data Provider Services	1.1.3 This Procedure details the requirements for two 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* - 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*	Procedure only	The proposed changes as per 1.1.3 of the Meter Churn Procedures advises the financially responsible Market Participant is to notify the current Responsible Person in advance of the Meter Churn. It is our opinion the end to end process of how this is to occur is not clearly outlined in proposed changes. It is our assumption from reading 1.1.3 b) of the Meter Churn Procedure proposed changes, that the FMRP can raise a request for a Meter Churn and raise a CATS Change Role Notification to become RP and change relevant Metering Roles at the same time and these notifications would notify the current Responsible Person of the Meter Churn in advance. It is our view AEMO's drafting is not transparent by advising under b) 'providing the responsible person has been made aware of the Meter Churn in advance' It is our assumption as per the rules that the CR 1500 only has 20 business days retrospectively for a CR6800 and a CR6801 does not require a CR1500 but this is to complete overnight using the proposed date provided in the CR. The Service Level Procedures for MPB section 4.14 task 8 obligates them to schedule and undertake work (up to 10 business days), it is our expectation the MDP will have to meet the 20 business day's obligation and that the MPB abides by their obligations in the SLP. We want to avoid situations where we have raised the request for the Meter churn to occur and it does not complete and we also have to withdraw our Change Role request to re-raise it again. There is some concern internally where the meter churn request may not complete. The current Meter Churn Procedure includes some high level diagrams associated with retail transfers (e.g. Meter Churn on Customer Transfer Date, Meter Churn Post Transfer Date) however AEMO is proposing to

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And BDPIP Process Flow Diagrams	*Churn* in advance. Following the *Meter Churn*, the *financially responsible Market Participant* must become the *responsible person* in accordance with the MSATS Procedures. **3.1 Initiating Meter Churn** 3.1.1 *Meter Churn* can be initiated by the *responsible person* at any time. 3.1.2 *Meter Churn* can be initiated by the *financially responsible Market Participant* for the relevant *market load*, as recorded in MSATS, in the following circumstances: a) Where the *financially responsible Market Participant* does not intend to become the *responsible person* for the *metering installation* as a result of the *Meter Churn*, the *financially responsible Market Participant* may request the *responsible person* to perform *Meter Churn* in accordance with the *B2B Procedures;* or b) Where the *financially responsible Market Participant* intends to become the *responsible person* for the *metering installation* as a result of the Meter Churn, the *financially responsible Market Participant* must notify the current *responsible person* in advance of any alterations to the *metering installation* or change of service provision being undertaken, including: i. ~~Of~~ Tthe proposed date of the change or alteration; and ii. In accordance with the requirements of the MSATS Procedures. 3.1.3 If *Meter Churn* will result in a type 5 or 6		remove these maps, and it is AGL's view that the maps which have been inserted in the Service Level Procedures for Meter Data Provider Services are not sufficient replacements as they only include 'day -1 midnight of day of meter churn' and what occurs when the churn completes, they do not appear to include what needs to occur as part of organising the meter churn , role changes etc. If AEMO is proposing to remove the existing diagrams from the Meter Churn Procedure we propose they should be replaced with diagrams to cover the relevant scenario's, end to end high level process including time line (e.g. from obtaining EIC to, entering transactions in MSATS with relevant roles, meter churn request, relevant MSATs transactions, CR 1500 etc.) to ensure processes are transparent and not left open for possible different interpretation by participants. AGL also recommends AEMO reviews the BDPIP Process Flow Diagrams to determine what modifications may be required. AEMO does not appear to have considered these as part of this consultation package, participants do utilise these process flow diagrams although they do not appear to have been updated for some time.

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	metering installation becoming a type 1, 2, 3 or 4 *metering installation*, the *financially responsible Market Participant* must become the *responsible person* as a result of the *Meter Churn*, unless the *financially responsible Market Participant* has requested the *Local Network Service Provider* to provide an offer to act as the *responsible person* and has accepted that offer in accordance with section 7.2.2 of the *Rules*.		
Clause 4.12.1 a) SLP MPB	a) The Metering Provider must make every reasonable endeavours to first contact the current Metering Data Provider prior to undertaking any change of metering and is required to:	Procedure Change	AGL would like confirmation on what is considered 'reasonable endeavours'