METERING COMPETITION

EMBEDDED NETWORKS

METER REPLACEMENT PROCESSES

POC Pkg 2
PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE

***Participant**: Active Stream*

***Completion Date**: 15th November 2016*

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1. General Comments

Item	Comment
1	Collectively it would have been more time efficient for Participants if the Response template was formatted and updated accordingly for this draft consultation, such as : - Title page to reflect correct consultation stage etc. - Font within the table to be consistent between columns etc.
2	When reading documents there appeared to be inconsistency in the message/process of the document. Some sections were very light on missing clarifying detail.
3	The 'Exemption Guideline Small Customer Metering Installation' draft was first distributed and then removed from consultation. Though we recognise the reason why, we have tagged some comments with respect to this guideline at the end of this document for AEMO's consideration.

2. Glossary and Framework

Please delete any rows where there are no participant comments

(note: only sections that have changed as part of Work package 2 are listed in the table below)

Clause	Heading	Participant Comments Glossary & Framework
1.3	Related AEMO Documents	Maintain consistency in the Table with respect to reference material: - Call out each MSATS Procedure i.e. CATS, WIGS MDM etc. Otherwise, apply the same approach to the Metrology Procedure docs. I.e. remove each metrology procedure and reference them at the next level up - as Metrology Procedures. However, the general intention for the 'Related Documents' section in any document is to aid the reader with reference material by clearly identify each doc and provide their link- not a category of documents - Documents referenced should have their titles aligned with the actual documents. I.e. Service Level Procedure (MDP) should read Service Level Procedure: Metering Data Provider Services, as this is the title of the document and so on…
2.8	Metering Service Level Procedures	2.8.1 – this should reflect the title of the document not a version of it. The paragraph starts with: This document …hence, it is making a direct reference to the document. 2.8.2 – this should reflect the title of the document not a version of it. The paragraph starts with: This document …hence, it is making a direct reference to the document.

2.9	Service Level Procedure for Embedded Network Managers	AEMOs approach during the POC update and review of documentation has been the utilisation of acronyms. For consistency, suggest replace Embedded Network Managers with ENMs. This will also align with the other subheadings of section 2 within this document.
3	Glossary Term: Exemption Guideline	The definition is just a repetition of the Title – no value add. Suggest a definition (1-2 sentences long) which provides some context with respect to the document.
3	Glossary Term: Exemption Procedure	The definition is just a repetition of the Title – no value add. Suggest a definition (1-2 sentences long) which provides some context with respect to the document.
3	Glossary Term: HV	Suggest a definition of what HV is. i.e. A voltage greater than 1kV
3	Glossary Term: LV	Suggested inclusion to current wording: - spelling out LV i.e. low voltage
3	Glossary Term: NMI Procedure	Suggest a definition (1-2 sentences long) which provides some context with respect to the document.
3	Glossary Term: Qualification Procedure	Suggest a definition (1-2 sentences long) which provides some context with respect to the document.
3	Glossary Term: Service Level Procedure (ENM)	Suggest a definition (1-2 sentences long) which provides some context with respect to the document.
3	Glossary Term: Unmetered Load Guideline	Suggest a definition (1-2 sentences long) which provides some context with respect to the document.

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

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments Default & Deregistration Procedure (MP, MDP, ENM, MC)
3	DETERMINATION OF TYPE OF BREACH	It is pertinent to: - Identify in this section the breach notice/s which will be treated as a warning. - Define what a warning is and the level of magnitudes associated with a warning. This would provide context for the remaining sections of the procedure. Clause 7.4.4 (b) (3) states: *the levels of a breach with severity below a material breach are to be treated as warnings with different levels of magnitude.*
		'One of the matters that AEMO must determine at the conclusion of a Review is what type of Breach has been committed by the relevant MP, MDP, ENM or MC.' According to the above sentence the type of Breach is determined at the conclusion of the Review, but a review will not happen if the breach is rectified within seven days according to the 'Notice of Breach – Appendix A'. The wording defining a process is confusing and a little misaligned when all the dots in this procedure are joined. Interpreting the wording – AEMO issues a Notice of Breach – it is rectified within seven days of receipt of notice. According to the Notice there is no AEMO review, does that mean no breach (when interpreting the wording above)?

4	ISSUE OF BREACH NOTICE	Participants which report a suspected breach are not looped in with any follow up actions. If they identify a suspected breach, it probably means that they were in some manner impacted. A participant's breach can result in consequential breaches on other parties; hence, we recommend the process to include communications to other impacted parties. Contracting/Impacted parties should know of material/significant breaches. The procedure should also identify the party who is required to provide the information. i.e. AEMO notifies or there is a requirement on the 'Party of Breach' to notify (via contractual agreements) These parties should also be advised of subsequent AEMO actions.

5	REVIEW OF CAPABILITY FOR ONGOING COMPLIANCE	*"If an MP, MDP, ENM or MC has not remedied the breach referred to in the Notice of Breach within 7 days after <u>the issue of the notice</u>…."*
		However, the Notice of Breach – Appendix A states:
		"If (party in breach) remains in breach for more than seven days following the <u>receipt</u> of this notice,"
		There is an inconsistency between these two references.
		Suggest:
		- Appendix A amended to advise *<u>after the issue of notice</u> to mitigate any* confusion with the date:
		  ○ issue date is identified on the Notice of Breach
		  ○ Receipt date has a number of variables i.e. postal delivery timeframes
		- Referencing business days not calendar days i.e. 7 days = 5 bus days. This would provide a consistent approach with the business world unless the intention is that AEMO personnel would be working on public holidays and weekends, to follow up with the action item.

		Suggest that perhaps different timeframes should be assigned to the different levels of breaches, taking into consideration: - the type of customer (Small/large) - the severity of the suspected or confirmed breach
5.1	Remediation Plan	Contracted/Impacted Parties should also be aware of any remediation plan and reporting as there may be a direct link with agreements and downstream impacts, i.e. contractual, financial and operational.
5.2	Past Conduct	*(b) The level of any previous warning issued to the relevant MP, MDP, ENM or MC;* The introduction of a new term 'warning' which has not been previously defined in this document. This lends itself to the request in section 3 to include a definition to deliver clause 7.4.4 (b)(3): *the levels of a breach with severity below a material breach are to be treated as warnings with different levels of magnitude.*
6	AEMO ACTION FOLLOWING REVIEW	*If, at the conclusion of the Review, the Breach has not been remedied, AEMO must determine whether it is a Material Breach and then determine what action to take.* Section 6 is not only about Material Breaches. The wording above can be interpreted as AEMO must determine what type of Breach, if the Breach has not been remedied. Irrespective of the requirement/non-requirement of a remediation plan, AEMO would still take some form of action against all Breaches- not only Material – even if it is only to make a record of the Breach. If wording is retained it contradicts section 4's interpretation. Suggested rewording: AEMO must determine at the conclusion of a Review, what type of Breach has been committed, if the breach has been remedied and what action to take.

6.1	Material Breach	- *If AEMO determines that the Breach is a Material Breach…* Suggest replacing the word 'If AEMO determines that the Breach…. ' with ' Upon demonstrating that the Breach…… ' as: the NER 7.4.4 (b)(2) states: *Deregistration of a MDP/MP can only occur if it can be demonstrated that the provider has committed a material breech.* - If parties are to be deregistered, there is no defined approach to a mandatory deregistration and the events which need to be followed. This appears to be a gap but a necessary requirement.
6.2.2	Warnings	*If the Breach is not a Material Breach, AEMO may issue a low level warning or a high level warning.* clause 7.4.4 (b)(3) states: *the levels of a breach with severity below a material breach are to be treated as warnings with different levels of magnitude.* Clarification is sought on the above. Does it mean that there are instances where AEMO will not issue a warning? Given that Non-Material Breaches will be treated as warnings, what is the status of the Breach if a warning is not issued?
7	EXERCISE OF AEMO DISCRETION	- Suggest that a matrix be created by AEMO which defines the possible actions associated with each Breach, something similar to a Risk Matrix. This would provide a level of clarity/guideline to participants.
7.1	Relevant Considerations	- Remove 'reasonably' from 'reasonably confident'. AEMO will have to have a finite state of confidence (confident or not confident). Otherwise, how is reasonably confident defined? - Suggest that the considerations are split and aligned as per the format of section 6 clauses (6.1/6.2- Material/Non-Material Breaches). Considerations for material breaches should have a greater weight than those for warnings.

9.1	Application	This section appears incomplete and inconsistent from a participant's process. It appears that the process determinations for voluntary deregistration have not been aligned with a participant facing structure. Recommend: - the high level process is consistent, with only the level of detail changing accordingly with the Participant. For example, a common contact point could be the trigger event for all participants such as the Registration Desk and not only for the MC.
9.1.3	Metering Coordinators	Seeking clarification why the MC application varies. Suggest this section should be removed and the MC should be included in 9.1.2
9.2	Process	Suggest the high level process should be the consistent for all participants. I.e. the trigger, the notification etc. Recommend: The development of a standardised matrix/checklist as supporting material advising of the activities which need to be undertaken for each participant in the deregistration process. AEMO to also include a high level process/requirements for MDP, MC, MP deregistration as they have outlined for ENMs. If it is determined that there is a delta in the process associated with the type of deregistration- voluntary/AEMO mandated – then this should also be identified and included. Participants should understand what is required and what is involved in the process of deregistration to enable a streamlined and efficient process by clarifying the associated deregistration activities by all impacted parties, where applicable.
9.2.1	All Applicants	This should also include the MC. The Registration desk appears to be the most appropriate contact point for all applicants and should be included in this section.

APPENDIX A	NOTICE OF BREACH	- The volume of participants in the new world will increase as afforded by an innovative commercial world. Breach notices are also assumed to increase proportionally. To allow a continuity of information/communication the breaches should have a unique identifier for reference. That is all communications pertaining to a specific breach should use that number as a reference. - Align the timeframe with earlier sections of this documents. That is, from the date of issue not from the date of receipt.
APPENDIX B	METERING COORDINATOR DEFAULT NOTICE	Communications pertaining to a specific breach should use a unique identifier assigned to the breach as a reference.
APPENDIX C	NOTICE TO APPOINTERS	Communications pertaining to a specific breach should use a unique identifier assigned to the breach as a reference.
APPENDIX D	OUTCOME OF REVIEW	Communications pertaining to a specific breach should use a unique identifier assigned to the breach as a reference.
APPENDIX E	NOTICE TO AFFECTED PARTIES	Communications pertaining to a specific breach should use a unique identifier assigned to the breach as a reference.

4. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments Exemption Procedure (Metering Installation Malfunctions)
1	INTRODUCTION	Clause 7.8.10 (d): A *Registered Participant*, *Metering Provider* or *Metering Data Provider* who becomes aware of a *metering installation malfunction* of a *metering installation* that cannot be rectified within the applicable timeframes as specified in paragraph (a) must notify the *Metering Coordinator* of the *metering installation malfunction* within 1 *business day*. Identifying a metering installation malfunction – when does the industry determine that a metering installation malfunction has been identified? Does this timeframe allow some investigative process? Is it: - When remote communications fail with a meter? Is this day 1? - When an MPB receives a meter alarm? - Once a technician has attended a suspected fault? In the small customer space the meter volumes for participants would be x100000's. For example, a comms failure may identify a fault but this will not be known without an investigation. In the small customer space, if the MC was to be advised for every comms failure without an investigation, they and AEMO would be inundated with exemptions and unnecessary administrative handling which may be rectified prior to the completion of the exemption process. Recommend a clarification of the process is required and possibly re-engineering to align with the true objective of the NER

		For small customer's metering malfunction resolution, 10 bus days is not enough if the investigative process is not allowed. 4 bus day notification has to be provided to the customer especially if there is to be an interruption of supply. In all likelihood a MP will not visit the site to investigate a metering malfunction and walk away if a meter needs to be replaced because they have not allowed the 4 bus days notification. They will build the 4 bus days into their process. The process involves: Identify the malfunction, notify Retailer of meter fault (B2B), retailer may raise a Change of roles, retailer raises B2B SO, MP schedules work, retailer advises customer of planned notification interruption (allow postage delivery). In most cases, the MP will realise at scheduling work stage the timeframes will not be met to allow for customer notification and they'll have to inform the MC for an exemption.
		For instances where a metering installation malfunction exemption has been granted, this should be available to current/incoming related parties. Not having visibility to the provision of an exemption: - May inundate the MC with notifications from multiple parties (clause 7.8.10 (d)) - May have direct implications on services the customer is advised of/provided and complicate an otherwise straightforward process.

1.1	Purpose and Scope	NER schedule 7.5 (b) states: A *metering installation* meets the *minimum services specification* if it: (b) is connected to a *telecommunications network* which enables remote access to the *metering installation*; ***metering installation malfunction*** The full or partial failure of the *metering installation* in which the *metering installation* does not: (a) meet the requirements of schedule 7.4; or (b) record, or incorrectly records, *energy data*; or (c) allow, or provides for, collection of *energy data*; or (d) in the case of a *small customer metering installation*, meet the requirements of schedule 7.5. According to the above type 4a meters (small customers) will fall into the metering installation malfunction - irrespective of the reason why. One interprets them as being captured by this procedure. Seeking confirmation that: - type 4a meters are in scope with respect to this procedure - if a customer rejects remote access enablement of their meter – which may mean no connection to a telecommunications network – that this is still classified as a metering installation malfunction, according to the wording above. If out of scope, seeking a procedure which would underline the exemption process for these meters.
2	APPLICATION PROCESS	The term current MC is redundant. The MC is the current MC unless otherwise defined as *incoming*….

2.5	Grant of Exemption	*If AEMO grants an exemption, it will commence on the date that AEMO received the application.* <u>Suggest the following re-wording of the above:</u> *An exemption granted by AEMO will commence on the date that AEMO received the application.* However, why is the exemption from the day of receipt? There are 2 alternative options: - If it is assumed that the MP/MC is compliant for the first 10 bus days then apply an exemption from the 11th bus day of identifying the malfunction and not the date of receipt or - Since the Malfunction Identified Date is a field in the application form this should be the date the exemption applies Suggest that the exemption will be effective from the date the malfunction was identified. (a field in the proposed Appendix A – Application form)
2.6	Application Unsuccessful	*(b) The malfunction referred to in the application does not constitute a metering installation malfunction.* Suggest AEMO provide a list of 'malfunction' which will not constitute a metering installation malfunction. This will provide a guideline to participants to mitigate any unnecessary exemption submissions.
2.9	Expiry of Exemption	- Rectification generally implies a fix, amendment Suggest wording: *Rectification/replacement of the metering installation* - Change of MC should not impact the exemption status of the metering installation. This would provide unnecessary administrative handling as a change of MC may not require an MP change.

5. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments MSATS Procedures: National Metering Identifier
2.1	NMI Allocation by AEMO	Clause d) 2nd sentence should be deleted as immaterial since they are allocated to gas….
2.2	Issue of NMIs by LNSPs and ENMs	- This section is not clearly articulated. If it is about the issuing of NMIs the clauses contained within should be rewritten. A FRMP can also request a NMI from ENM if the customer is within an EN and has approached them to be their retailer. - a)(ii) the second sentence is not required. It is AEMOs internal process.
5	NMI CHECKSUM	Clause 5(b) should be removed as this is a MSATS CATS requirement and clearly stated in the CATS procedure document.
10	NMI RULES	- Please add clauses to each rule for a reference point…. - Rule 3 – Allocate NMI SO will <u>not</u> contain a NMI. This procedure is about the allocation of NMI/s and the NMI structure. It should not mandate requirements pertaining to market transactions with their own procedures. i.e. CATS procedures mandate fields such as NMI and Check sum, B2B mandates fields such as NMI etc.,

6. Qualification Procedure

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments Qualification Procedure

7. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments Service Level Procedure – Embedded Network Manager
4.1	NMI Allocation	c) suggested gap The current wording enables an ENM 5 bus days to provide the NMI after they have allocated it but does not place a timeframe for the allocation. Suggest rewording: c) Provide the Child NMI to the MC, FRMP and EENSP for the metering installation within five business days of receiving the NMI allocation request.
4.3.1	Market Exit	Recommend for c) When the child NMI is Off Market the market roles should be removed from the NMI. The FRMP, MPB, MDP are no longer applicable as the child NMI is once again part of an Embedded Network.

8. Unmetered Load Guideline

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments Unmetered Load Guideline

9. Exemption Guideline – Small Customer Metering Installation

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments Exemption Guideline – Small Customer Metering Installation
1.2	Definitions and Interpretation	This document is a guideline; hence, the wording of this section need to be reviewed and reworded as referencing a procedure.

2.1	Basis of Exemption	Each MP/MDP metering systems and technology is different. Even when there may be some public telecommunication network like landlines, cable, mobile and other wireless forms of telecommunications if may not be compatible with MPs/MDPs backend systems. In the instance where MC has demonstrated to AEMO's reasonable satisfaction that all existing telecommunications are either not available or are non-compatible with MP/MDPs backend systems it should be considered as "Basis of Exemption", Suggest changing the wording to : "if the MC demonstrates to AEMO's reasonable satisfaction that there is no existing *telecommunications network* enabling the *remote acquisition* of *metering data* from a *metering installation or available options cannot be made compatible with its current backend systems within reasonable time and cost."* *Also add* *C) Available public telecommunication networks are non-compatible with its data acquisition systems* *D) requires substantial time and cost to support other means of communications*
2.2	Period of Exemption	*2.2.2(b) states:* *3 months following the date on which a telecommunications network first provides coverage in the vicinity of the relevant metering installation;* The current wording implies that an MC will have a telecommunications network coverage protocol with the various Service Providers to ensure they are provided with communications when their network coverage areas are updated. Suggest the clause is reworded to allow for the MC to be informed without dependencies on telecommunications service providers and provides them enough time to ascertain that the site itself has access to the telecommunications network. For example, some sites may be in a 'drop out zone' even though their neighbours down the road will have 100% network access.

3.3	Timing of Application	a) A SP will not have 100% awareness of network coverage pertaining to a site for planned installations. That is, a site may fall in a 'dead zone' where the overall vicinity is highlighted as having full coverage. Hence the MPB has no idea of the issue until they install the meter and try to ping it. b) For unplanned installations – 2 business days will allow one to try and communicate with the meter. After that period, the MPB will investigate the meter to ascertain that it is not a malfunction causing issues with the communications. Recommend the timeframe would be more aligned with the 10 bus days timeframe applied to malfunctions. Alternatively, MPB can submit to AEMO an exemption for every small customer metering which does not have remote access 'Day1' on behalf of the MC. This will allow the MC to be compliant after the 2nd bus day. Recommend that these clauses are revisited and re-engineered to mitigate unnecessary administrative handling.
3.5	Current MC's Obligations during the Exemption Period	Suggest (a) **or** (b) not **and**. A telecommunications network may not be available by the exemption's expiry date which would not allow an MC to contact AEMO on the last day, let alone 6 months prior, and advise that the network will be operational.
4.1	Exemption Personal to Metering Coordinator	Suggest reword to remove 'procedure'.
4.2	Application for Re-issue of Exemption if No Change in Circumstances	a) A more efficient process for AEMO keeping updated records would be: a. to run a report and reconcile the MSATS data against their MC exemption record vs NMI or b. The New MC will know that the meter type is 4a. They'll investigate and identify a network issue. They should apply for an exemption. The receipt and processing of the New MC application should 'void' the exemption of the previous MC.

	APPENDIX A – APPLICATION FOR EXEMPTION	The listed affected participants are only as current as of the day the application was populated. Why is this information required?

10. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments