METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Origin Energy*

Completion Date: *November 2016*

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1. 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

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

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Clause	Heading	Participant Comments

3. Exemption Procedure (Metering Installation Malfunctions)

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Clause	Heading	Participant Comments
2.2	Timing of Application	With an increased number of COMMS4 metering installed there will be an increased volume of exemptions required based on current exemptions percentages on meters installed. The submission timeframe should be extended to 20 Business Days for sites with a SMALL NMI Classification. This will place critical timing impacts on both the MC and AEMO to manage the exemption process within the obligated timelines. With mass market customers there will be an increased need to coordinate any site investigations with customers. Identifying the issues, contacting the customer and setting up an appointment for a site visit would mean that be more achievable to have a 20 business day timeframe for the exemptions submission as it will reduce the unnecessary exemptions that will otherwise be resolved within 20 days There is also much lower financial risk to participants of substituted data for 20 days which can be based on previous customer consumption from the COMMS4 meter.
2.3	AEMO's Determination	With the increased volumes of exemptions submitted the 2 business day timeframe to acknowledge and then approve seem unnecessarily tight. It would seem that a 5 business day timeframe for the AEMO assessment would seem

		more achievable, without increasing any risk to the process.

4. MSATS Procedures: National Metering Identifier

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Clause	Heading	Participant Comments
4.1	NMI Allocation	NMI Allocation for ENM must retain some link to the LNSP NMI structure. There is a high level of understanding across industry of NMI standards and structure and the numbering that indicates LNSP, maintaining this link with an ENM NMI will help industry participants and reduce unnecessary complexity.

5. Qualification Procedure

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Clause	Heading	Participant Comments

6. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments

7. Unmetered Load Guideline

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments