



METERING COMPETITION EMBEDDED NETWORKS METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Red Energy and Lumo Energy

Completion Date: 20 July 2015

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1. Glossary and Framework

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
Chapter 3	Glossary	<p>The following terms are listed within the Glossary with the definition referencing a section of a Procedure rather than providing a definition e.g. See section 4.11.2 of the CATS Procedures</p> <ul style="list-style-type: none"> * Datastream Status Code * Objection Code * Objection Rules * Role Code <p>We recommend that as this is a glossary which participants are to reference, a brief definition is to be included and reference can be made to a section of a procedure.</p> <p style="text-align: center;">+++++</p> <p>The following terms' definitions do not provide appropriate information – i.e. which participant undertakes the process:</p> <ul style="list-style-type: none"> * Substitution - A process undertaken for the replacement of missing (null) or erroneous metering data or where metering data has failed Validation 		

		<p>* Validation - A process to test the veracity and integrity of metering data.</p> <p>We consider that the current Metrology Part A Procedure defined terms provide more clarity than the terms specified in the glossary. We request that these be reinstated in the glossary.</p> <p>substitution, substitute, substituted</p> <p>A process undertaken by a <i>Metering Data Provider</i> or <i>AEMO</i> for the substitution of missing (null) or erroneous <i>metering data</i> or where the <i>metering data</i> has failed the <i>validation</i> process</p> <p>validation, validate, validated</p> <p>A process undertaken by the <i>Metering Data Provider</i> to test the veracity and integrity of <i>metering data</i> prior to transfer to <i>AEMO</i> and other <i>Registered Participants</i></p>		
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2. Meter Data File Format

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
3.3	File construction	<p>Red and Lumo recommend that 3.3.4 is updated to the following:</p> <p>“Index Read for type 4, 4A and 5 Metering Installations.”</p>		

		<p>Our proposed recommendation is consistent with our existing Victorian obligations. These obligations are found in the current Essential Services Commission Energy Retail Code version 11, where the index read is associated with smart meters.</p> <p>See: http://www.esc.vic.gov.au/wp-content/uploads/esc/2a/2a0c8726-1a0b-4671-ba4e-da14178f92fe.pdf</p> <p>Definition:</p> <p>index read in relation to <i>smart meters</i> has the meaning given under the Meter Data File Format Specification NEM 12 and NEM 13 published by the Australian Energy Market Operator</p> <p>smart meter means an interval meter that meets the functionality requirements set out in the <i>Functionality Specification</i> and:</p> <p>(a) is designed to transmit <i>metering data</i> to a remote location for data collection; and</p> <p>(b) does not, at any time, require the presence of a person at, or near, the <i>meter</i> for the purposes of data collection or data verification (whether this occurs manually as a walk-by reading or through the use of a vehicle as a close proximity drive-by reading), including, but not limited to, an interval meter that transmits <i>metering data</i> via direct dial-up, satellite, the internet, general packet radio service, power line carrier, or any other equivalent technology</p> <p>The following clause indicates that the index read is to be displayed on a <i>small customer's</i> bill.</p> <p>25 Contents of bills (SRC and MRC)</p> <p>(1) A <i>retailer</i> must prepare a bill so that a <i>small customer</i> can easily verify</p>		
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		<p>that the bill conforms to their <i>customer retail contract</i> and must include the following particulars in a bill for a <i>small customer</i>:</p> <p>(y) if a <i>customer's</i> bill is derived from interval data from a <i>smart meter</i>:</p> <p>(i) the <i>index read</i> at the end of the billing period; and</p> <p>(ii) the <i>index read</i> at the start of the billing period; and</p> <p>(iii) the actual tariffs; and</p> <p>(iv) the total amount of electricity (in kWh) consumed in each period or class of period in respect of which a relevant tariff applies to a <i>customer</i>.</p>		
4.4	Interval data record (300)	<p>Field = <i>ReasonCode</i></p> <p>Definition = Summary of the reasons for Substitute/Estimate or information for all <i>IntervalValues</i> contained in this record.</p> <p>The <i>ReasonCode</i> applies to all <i>IntervalValues</i> in this record.</p> <p>Not required if quality flag = “N”, or “E”, but can be provided for information.</p> <p>The field must not be populated if quality flag = “V”.</p> <p>Allowed values: Refer Appendix E</p> <p>The current version of the Meter Data File Format Specification has the following definition for this field and includes ‘A’:</p> <p>Summary of the reasons for substitute/estimate or information for all <i>IntervalValues</i> contained in this record.</p> <p>The <i>ReasonCode</i> applies to all <i>IntervalValues</i> in this record.</p> <p>Not required if quality flag = “A”, “N”, or “E”, but can be provided for informational purposes.</p> <p>The field must not be populated if quality flag = “V”.</p> <p>Allowed values: Refer Appendix E.</p> <p>Suggestion is for the definition to remain as per the current definition within version 1.02 to include the ‘A’</p>		

4.6	B2B details record (500)	<p><i>Index Read</i> definition is to be updated within the table (page 15 clean draft) to the following as per the response provided for 3.3 File construction:</p> <p>The total recorded <i>accumulated energy</i> for a Datastream retrieved from a <i>meter's</i> register at the time of collection.</p> <p>For type 4, 4A and type 5 <i>metering installations</i> the MDP must provide the <u><i>IndexRead</i></u> when collected. Refer section 3.3.4.</p>		
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3. Metrology Procedure: Part A

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
4.10	Alarm Meters	<p>This is a new clause within this Procedure and should be consistent with similar clauses in other Procedures, i.e. the terms applied should be consistent for all Procedures and in line with the MDFF reason codes (Appendix E Reason Codes) related to an alarm.</p> <p>Where the <i>meter</i> supports alarm functionality as an attachment to the interval metering data, the MP is required to enable the following alarms:</p> <ul style="list-style-type: none"> (a) Power failure; (b) Voltage failure; (c) Pulse or interval data overflow; (d) Checksum error; and (e) Time reset. 		

		<p>The following clause is from Metrology Part B:</p> <p>7.2. Validation of interval metering data alarms</p> <p>The MDP must Validate <i>interval metering data</i> against the following Meter Alarms when these are provided in the <i>meter</i>:</p> <p>(a) power failure / meter loss of supply for instrument transformer connected metering installations only</p> <p>(b) VT or phase failure,</p> <p>(c) pulse overflow,</p> <p>(d) cyclic redundancy check error, and</p> <p>(e) time tolerance.</p> <p>Recommendation that this clause and other similar clauses within other Procedures are reviewed and changed where required to provide consistent terms.</p>		
10.1	Installation by ASPs	<p>The table is 'blank'. If the clause is to remain then reference is to include the jurisdiction, the variation, and 'end date' and the reason for this.</p> <p>Recommendation is that the clause is removed.</p>		
11.3	Meter Churn Process	<p>When a Meter Churn is initiated, the MC must ensure:</p> <p>(c) the start date for any New MP or New MDP is:</p> <p>(iii) for Jurisdictions where reversion is permitted, the <i>meter</i> change date +1 day for an Interval Meter to Accumulation Meter change.</p> <p>Red and Lumo recommend this be removed as there will be no reversion applicable from 1 December 2017.</p>		

13.4	Access to Metering Data	<p>Subclauses have been repeated within this section, i.e. (a) & (b) are then followed with the following:</p> <p>The MC must ensure that <i>metering data</i> from the following is transferred to AEMO:</p> <p>(a) <i>interval metering data for first-tier loads</i>, including First-Tier Controlled Loads <i>calculated metering data for first-tier loads</i>, and</p> <p>(b) <i>accumulated metering data</i> for First-Tier Controlled Loads in New South Wales and Queensland.</p>		
13.5	Verification of Metering Data for Type 4A, 5, 6 and 7 Metering Installations	<p>Confirmation is required from AEMO that the heading as per the draft Procedures (clean) is correct, i.e. Verification of Metering Data for Direct Connected Small Customer Metering Installations, Type 4A, 5, 6 and 7 Metering Installations</p> <p>If so, then this clause would exclude CT connections and Large Customers.</p>		
14.2	Metering Installations Affected	<p>Type 7 metering installations should not be excluded from being affected by an emergency condition. As traffic lights and public lighting can be affected by an emergency condition determined by the LNSP, e.g. Natural disaster. For safety reasons there would be a need for these installations to be included within the emergency procedure to ensure inclusion of prioritisation for reconnection of this and other meter installations.</p>		

4. Metrology Procedure: Part B

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
2	PRINCIPLES FOR VALIDATION, SUBSTITUTION AND ESTIMATION	Refer comments within section 12 below - Other Issues Related to Consultation Subject Matter.		
2.2.	Substitution requirement	<p>The following statement appears to be missing AEMO as per the obligation described in the current Procedures:</p> <p>The MDP must undertake Substitutions on behalf of or the MC, as appropriate, in a manner consistent with this Procedure. Substitutions may be required in the following circumstances</p> <p>The current Procedures state:</p> <p>1.5 Metering data substitution requirement</p> <p>1.5.1 The <i>Metering Data Provider</i> must undertake <i>substitutions</i> on behalf of AEMO or the <i>responsible person</i>, as appropriate, in a manner that is consistent with the <i>metrology procedure</i>. <i>Substitutions</i> may be required in the following circumstances;</p> <p>+++++</p> <p>The following clause as written indicates that all participants must agree regardless of which participants have been affected. I.e. if only one or two</p>		

		<p>are affected all three are to agree.</p> <p>(i) When the FRMP, LR, and LNSP have all agreed and subsequently informed the MDP that a previous Substitution was inaccurate and that a re-Substitution of <i>metering data</i> is required</p> <p>The current procedure states the following:</p> <p>(j) When the affected parties have all agreed and subsequently direct the <i>Metering Data Provider</i> that a previous <i>substitution</i> is in error and that a re-<i>substitution</i> of <i>metering data</i> is required. Where the parties cannot reach agreement, the <i>Rules</i>’ dispute resolution procedures apply, and the existing <i>substituted</i> data should remain until the resolution of the dispute is achieved.</p> <p>Recommend that AEMO update the drafting to state:</p> <p>(i) When all affected parties (the FRMP, LR, and/or LNSP as the case may be) have all agreed and subsequently informed the MDP that a previous Substitution was inaccurate and that a re-Substitution of <i>metering data</i> is required.</p>		
2.4.	Metering data quality flags	<p>As per the initial consultation response provided by Red and Lumo agreed within AEMO’s response, the description of ‘A’ has not been updated as recommended. I.e. the following definition for ‘A’ is from the current Metrology Procedure: Part B v5.30:</p> <p>1.7 Metering data quality flags</p> <p>1.7.1 <i>Metering Data Providers</i> must assign the relevant <i>metering data</i> quality flags to <i>metering data</i> as follows:</p> <p>(a) A - For <i>validated</i> and accepted actual <i>metering data</i> recovered from the <i>metering installation</i>.</p>		

		<p>The current description of ‘For Validated <i>metering data</i>’ allows for any type of metering data, this quality flag is to be limited to actual metering data.</p> <p>The description is to be updated to reflect the current Procedure version for ‘A’ as mentioned above.</p> <p>+++++++</p> <p>Typographical amendment: the following clause has <i>metering data</i> twice:</p> <p>Final Substitution</p> <p>(b) If Validated <i>metering data metering data</i> is unexpectedly recovered from the <i>metering installation</i> and a final Substitution has been undertaken in accordance with paragraph (a), the MDP must replace the final <i>substituted metering data</i> with the <i>accumulated metering data or interval metering data</i> and maintain a record of the reason</p> <p>Also the above clause is not correct as per the above initial response in reference the description of ‘A’. The clause should be:</p> <p>If Validated <i>actual metering data</i> is unexpectedly recovered from the <i>metering installation</i> and a final <i>substitution</i> has been undertaken in accordance with paragraph (a), the MDP must replace the final <i>substituted metering data</i> with the <i>actual metering data</i> and maintain a record of the reason and instance</p> <p>+++++++</p> <p>We recommend that the following clause is to be updated in line with the above from:</p> <p>Final Substitution</p>		
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		<p>The MDP must undertake final Substitutions in the following circumstances:</p> <p>(g) Where the MDP has found previous Validated <i>metering data</i> to be erroneous</p> <p>To:</p> <p>The MDP must undertake final <i>metering data substitution</i> in the following circumstances:</p> <p>(g) Where the MDP has found previous Validated actual <i>metering data</i> to be erroneous</p> <p>++++++</p> <p>The following statement as written is incorrect:</p> <p>The MDP may replace type 6 final <i>substituted metering data</i> with accumulated <i>metering data</i> that spans consecutive Meter Readings</p> <p>We recommend that this is updated to the following:</p> <p>The MDP may replace type 6 final <i>substituted metering data</i> with actual <i>metering data</i> that spans consecutive Meter Readings</p> <p>++++++</p> <p>As noted above in the Glossary section, the following terms are currently incorrectly defined or not defined within the Glossary and Framework document. These have been applied within this document and are to be updated as per the current Metrology Part A Procedure v5.30 to reflect the participant that undertakes the process. The definitions within the Glossary and Framework do not include the participant.</p>		
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		<p>substitution, substitute, substituted</p> <p>A process undertaken by a <i>Metering Data Provider</i> or <i>AEMO</i> for the substitution of missing (null) or erroneous <i>metering data</i> or where the <i>metering data</i> has failed the <i>validation</i> process</p> <p>validation, validate, validated</p> <p>A process undertaken by the <i>Metering Data Provider</i> to test the veracity and integrity of <i>metering data</i> prior to transfer to <i>AEMO</i> and other <i>Registered Participants</i>.</p>		
3.2.	Substitution Rules	<p>The following statement is incorrect within this section:</p> <p>The MDP must ensure that all <i>substituted metering data</i> are replaced with <i>interval metering data</i> when it becomes available</p> <p>As per the current Procedures <i>interval metering data</i> should be replaced with actual <i>metering data</i>.</p> <p>2.2.11 The <i>Metering Data Provider</i> must ensure that all <i>metering data substitutions</i> are replaced with actual <i>metering data</i> when that <i>metering data</i> becomes available.</p> <p>The statement should read as follows:</p> <p>The MDP must ensure that all <i>substituted metering data</i> are replaced with actual <i>metering data</i> when it becomes available.</p>		
4.2.	Substitution and Estimation Rules	<p>The following statement is incorrect, actual has been excluded:</p> <p>The MDP must ensure that all <i>substituted metering data</i> and <i>estimated metering data</i> are replaced with</p> <p><i>accumulated metering data or interval metering data</i> when it becomes</p>		

		<p>available</p> <p>The current Procedures has the following clause:</p> <p>3.2.2 The <i>Metering Data Provider</i> must ensure that all <i>metering data substitutions</i> and forward <i>estimations</i> are replaced with actual <i>metering data</i> if and when that <i>metering data</i> becomes available</p> <p>Actual is to replace accumulated and interval:</p> <p>The MDP must ensure that all <i>substituted metering data</i> and <i>estimated metering data</i> are replaced with actual <i>metering data</i> when it becomes available</p>		
5.2.	Substitution and Estimation Rules	<p>The following statement is incorrect:</p> <p>The MDP must replace all <i>estimated metering data</i> with either <i>accumulated metering data</i> or <i>substituted metering data</i></p> <p>The current Procedures has the following clause:</p> <p>4.2.2 The <i>Metering Data Provider</i> must replace all <i>metering data</i> forward <i>estimations</i> with either actual or <i>substituted metering data</i></p> <p><i>Accumulated</i> has been incorrectly applied this should be actual:</p> <p>The MDP must replace all <i>estimated metering data</i> with either actual <i>metering data</i> or <i>substituted metering data</i></p> <p>+++++</p> <p>The following has been incorrectly updated with <i>accumulated</i> when this should be actual:</p>		

		<p>(a) When accumulated metering data covering all or part of the Estimation period is obtained</p> <p>The current Procedures has the following:</p> <p>(a) When actual metering data covering all or part of the forward estimation period is obtained;</p> <p>Recommend that actual is reinstated.</p> <p>+++++</p> <p>The following clause has been incorrectly updated with accumulated where this should remain as actual as per the current Procedure</p> <p>(j) The MDP has no accumulated metering data.</p> <p>The current Procedure:</p> <p>4.2.8 (d) The Metering Data Provider has no actual metering data for the scheduled reading date for this connection point.</p>		
6.1.	Substitution Rules	<p>Typographical amendment: The clauses have been repeated within this section, i.e. (a) & (b) have been applied twice.</p> <p>+++++</p> <p>The following statement has not been amended as requested by Red and Lumo within the initial consultation response provided, which AEMO agreed to:</p> <p>MDPs must not perform a type 74 Substitution without seeking the agreement with the FRMP, LR and LNSP</p>		

		<p>We recommend that the following is included, as previously agreed by AEMO:</p> <p>MDPs must not perform a type 74 Substitution without prior agreement with the FRMP, LR and LNSP.</p>		
7.2.	Validation of interval metering data alarms	Refer to comments made within Metrology Procedure: Part A 4.10 Alarm Meters		
9.2.	Validation for manually read interval metering installations	Typographical amendment: The clauses have been repeated within this section, i.e. (a) & (b) have been applied twice.		
9.3.	Validation for metering installations with accumulated metering data	Typographical amendment: The clauses have been repeated within this section, i.e. (a), (b) & (c) have been applied twice.		
12.4.	ON delay and OFF delay	<p>Red and Lumo seek further clarification from AEMO as to the response provided to Red and Lumo's initial consultation submission of: 'Procedure has been deleted'.</p> <p>The current Procedure has the following for this section:</p> <p>14.5.1 This clause 14.5 applies only to the jurisdiction of the Australian</p>		

		<p>Capital Territory. For the jurisdictions of Victoria, New South Wales, Queensland, Tasmania and South Australia the ON and OFF delays are zero.</p> <p>(a) The <i>responsible person</i> must use the ON delay and OFF delay for each day of the year as provided in the following tables, when determining the on time and off time of photoelectric cells in accordance with clause 14.3.5.</p> <p>The draft Procedure has:</p> <p>In Victoria, NSW, Queensland, Tasmania and South Australia the ON delays and OFF delays are zero. In the ACT the MC must use the ON delay and OFF delay for each day as provided in the following tables, when determining the on time and off time of photoelectric cells in accordance with section 12.2.4</p>		
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5. MSATS Procedures: CATS Procedure Principles and Obligations

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
	QUICK REFERENCE GUIDE	Inclusion of the following within the Glossary, including 'Embedded Network' for ENC and ENP, i.e. Embedded Network Child and Embedded Network Parent, respectively		

		Notes: EN: Embedded Network, ENC: Child NMI, ENP: Parent NMI		
2.2	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	<p>The Current FRMP must ... (r) Inform the LNSP when a <i>connection point</i> is remotely <i>disconnected</i> or remotely <i>reconnected</i> unless the remote <i>disconnection</i> or remote reconnection has been performed by the LNSP.</p> <p>This clause has placed an obligation on the Current FRMP to provide notification of a remote disconnection or reconnection; however there is no change request available to facilitate this obligation. A reconnection can be arranged by the Current or New FRMP, its inclusion is limited to the Current FRMP. This is allowed in both rule 106A of the NERR, rule 7.3.2(i)(3)(i) of the NER and S7.5.1.1 as allowable in the Minimum Service Specification.</p> <p>On the above basis, we recommend that an obligation be placed on the incoming retailer, equivalent to the obligations placed on the current FRMP.</p> <p>The New FRMP must:</p> <p>... (iA) inform the LNSP when a <i>connection point</i> is remotely <i>reconnected</i> unless the remote reconnection has been performed by the LNSP.</p>		
2.3	LOCAL NETWORK SERVICE PROVIDER	<p>The NERR that is effective 1 December 2017 indicates that the Distributor is to provide the reason for the de-energisation if it is not at the Retailer's request (see rule 104(1) below). This obligation has not been placed onto the Distributor within this section. If the inclusion of the NERR obligations will proceed for the FRMP, then this will need to be updated accordingly to reflect the LNSP's obligation. Currently the CR to update a NMI status cannot provide the reason for the de-energisation. Red and Lumo recommend that this be added to the MSATS Procedures and associated CR updates.</p> <p>104 Notification of de-energisation</p>		

		<p>(1) If the distributor de-energises a customer’s premises in accordance with the energy laws, the distributor must as soon as practicable after the de-energisation notify the retailer of the de-energisation (including whether the premises were de-energised manually or remotely) and the reason for the de-energisation, except where the de-energisation is as a result of the retailer’s request.</p> <p style="text-align: center;">+++++</p> <p>The following clause references the NER, this should include the relevant clause of the NER:</p> <p>The Current LNSP must:</p> <p>c) Adopt the Role of MC who appoints the MPB, MPC, and MDP as required by the NER.</p>		
2.6	MC	Typographical amendment: For consistency, the heading should not be an acronym, i.e. this should be Meter Coordinator		
4.8	OBJECTION RULES	Typographical amendment: Incorrect formatting i.e. Note (1) is in reference to the previous section, 4.7 Objection Codes, Table 4-4 – Objection Codes not for this section.		
4.11	STATUS CODES (NMI AND DATASTREAM)	<p>The following clause does not include ‘D’ which is listed within Table 4-10</p> <p>(b) The only Meter Register Codes are C and R, as defined in Table 4-10</p> <p>In relation to the Name of code for D suggestion is that this is ‘Disconnected Remotely’ rather than ‘Remotely Disconnected’ – as this will avoid confusion between R and D.</p>		

4.14	FIELD VALIDATION RULES	<p>Typographical amendment: The table reference in the below clause is incorrect</p> <p>(a) The Field Validation Rules are based on data source codes as per table 4-O</p>		
5	REQUEST A REPORT	<p>This section would benefit with additional information as to the information contained within each report, how the report is obtained, who can request a report, the frequency of the report etc. If this information is available within another document/procedure it is to be included and referenced in this section.</p> <p>+++++++</p> <p>Typographical amendment: The use of (a) has been applied twice</p>		
7.1	Application [1000 1010 1020 1030 1040]	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>Section 10 applies when:</p>		
7.4	FRMP Requirements	<p>For consistency, update Retailer to FRMP in the following clause:</p> <p>(d) submit a Change Request to initiate the transfer of the End User from which the New Retailer has obtained Explicit Informed Consent and provide the following information with the Change Request</p> <p>+++++++</p> <p>In relation the following clause should a similar statement of 'or leave this to</p>		

		<p>the New MC to complete’ as it is within clause (j) be included?</p> <p>(e) for Change Reason Codes 1000, 1020, 1030 and 1040, if the MDP is changing, provide the following additional information</p> <p style="text-align: center;">+++++++</p> <p>Formatting issue: Dot points have been applied for clauses (g) & (h)</p>		
7.5	MDP Requirements	<p>Update the following clause to include Manual as highlighted:</p> <p>(h) Where the NMI Classification Code is SMALL</p> <p>(iv) if the Read Type Code does not require a manual Meter Reading, validate that the Metering Installation Type Code is identified as a type 1, type 2, type 3, type 4 or type 7 <i>metering installation</i>. If an error is identified, advise the New FRMP</p>		
7.7	Timeframe Rules	<p>Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodgement period has passed by the next business day.</p> <p>The proposed change is not supported and should remain at 5 business days. This is further explained in section 12 below.</p>		
8.	CHANGE RETAILER - ERROR CORRECTIONS –	<p>The MDP requirements for this section have been removed from the draft procedures for this consultation, whereas these requirements were in the proposed procedures for the initial consultation.</p>		

	SMALL NMIS	AEMO to confirm if this is correct, i.e. there are no requirements for the MDP for these change reason codes. If there are requirements, these are to be reinstated.		
8.1	APPLICATION [1021 1022 1023 1024 1025 1026 1027 1028 1029]	Confirmation required that the correct section has been referenced in the following statement: Section 10 applies to the following Change Reason Code		
8.6	Timeframe Rules	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodgement period has passed by the next business day. The proposed change is not supported and should remain at 5 business days. This is further explained in section 12 below.		
9.1	APPLICATION [1080 1081 1082 1083 1084]	Confirmation required that the correct section has been referenced in the following statement: Section 8 applies when:		
9.7	Timeframe Rules	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodgement period has passed by the		

		<p>next business day.</p> <p>The proposed change is not supported and should remain at 5 business days.</p> <p>This is further explained in section 12 below.</p>		
10.1	APPLICATION [1500]	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>Section 10 applies to the following Change Reason Code</p>		
10.2	CONDITIONS PRECEDENT	<p>The following clause should include the MC as this participant will also be able to initiate a Change Request.</p> <p>(b) The FRMP has Initiated a related Change Request requiring an Actual Change Date</p>		
11.1	APPLICATION [2000 2001]	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>Section 10 applies to the following Change Reason Codes</p>		
11.4	LNSP Requirements		<p>Previously it's been suggested by Red and Lumo that the NSP2 role for a Parent NMI is updated with the ENM participant ID. AEMO indicated in</p>	

			its Draft report that this field is limited to wholesale NMIs to store the DNSP. At this point in time, it would be beneficial to review expanding the use of the NSP2 field for the Parent NMI so that the ENM is identifiable within MSATS. New roles have not been created for a Metering Coordinator or Embedded Network Manager.	
11.5	MPB Requirements	<p>Suggest that a timeframe of within 1 business day is included in the following statement, currently there is no timeframe assigned.</p> <p>The New MPB must on receipt of the Change Request Status notification for the Completed status, provide the Metering Installation Type Code to MSATS using Change Reason Code 3000 or 3001.</p>		
11.6	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be		

		<p>submitted as the proposed one day lodgement period has passed by the next business day.</p> <p>The proposed change is not supported and should remain at 5 business days.</p> <p>This is further explained in section 12 below.</p>		
12.1	APPLICATION [2020 2021]	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>Section 11 applies to the following Change Reason Codes</p>		
12.6	TIMEFRAME RULES	<p>Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day logging period has passed by the next business day.</p> <p>The proposed change is not supported and should remain at 5 business days. This is further explained in section 12 below.</p>		
13.1	APPLICATION [2500 2501]	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>Section 12 applies to the following Change Reason Codes</p>		
13.5	TIMEFRAME RULES	<p>Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodgement period has passed by the</p>		

		<p>next business day.</p> <p>The proposed change is not supported and should remain at 5 business days.</p> <p>This is further explained in section 12 below.</p>		
14.5	TIMEFRAME RULES	<p>Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day logging period has passed by the next business day.</p> <p>The proposed change is not supported and should remain at 5 business days. This is further explained in section 12 below.</p>		
15.1	APPLICATION [3000 3001]	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>Section 13 applies to the following Change Reason Codes</p> <p>For consistency, the following is a suggested update for CR3001.</p> <p>Used where the Current MPB establishes the initial set of information in MSATS about the <i>metering installation</i> details, and there is no associated meter removal for the NMI for the same effective date. The date at which the information will apply would be a Retrospective Day.</p>		
16.1	APPLICATION [3004 3005]	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>Section 14 applies to the following Change Reason Codes</p>		

17.1	APPLICATION [3050 3051]	Confirmation required that the correct section has been referenced in the following statement: Section 15 applies to the following Change Reason Codes		
18.1	APPLICATION [3080 3081]	Confirmation required that the correct section has been referenced in the following statement: Section 16 applies to the following Change Reason Codes		
19.1	APPLICATION [3090 3091]	Confirmation required that the correct section has been referenced in the following statement: Section 17 applies to the following Change Reason Codes		
20	MAINTAIN METERING – CHANGE NETWORK TARIFF CODE – SMALL OR LARGE	Refer comments within 12. Other Issues Related to Consultation Subject Matter		
20.1	APPLICATION [3100 3101]	Confirmation required that the correct section has been referenced in the following statement: Section 18 applies to the following Change Reason Codes		
21.1	APPLICATION [4000 4001]	Confirmation required that the correct section has been referenced in the following statement:		

		Section 19 applies to the following Change Reason Codes		
22.1	APPLICATION [4004 4005]	Confirmation required that the correct section has been referenced in the following statement: Section 20 applies to the following Change Reason Codes		
23.1	APPLICATION [4050 4051]	Confirmation required that the correct section has been referenced in the following statement: Section 21 applies to the following Change Reason Codes		
24.1	APPLICATION [5070 5071]	Confirmation required that the correct section has been referenced in the following statement: Section 22 applies to the following Change Reason Codes		
25.1	APPLICATION [5001 5021]	Confirmation required that the correct section has been referenced in the following statement: Section 23 applies to the following Change Reason Codes		
25.8	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodgement period has passed by the next business day. The proposed change is not supported and should remain at 5 business days.		

		This is further explained in section 12 below.		
26	MAINTAIN NMI – CHANGE A NMI – SMALL OR LARGE	Refer comments within section 12 below - Other Issues Related to Consultation Subject Matter		
26.1	APPLICATION [5050 5051]	Confirmation required that the correct section has been referenced in the following statement: Section 24 applies to the following Change Reason Codes		
26.5	TIMEFRAME RULES	The table is missing for CR Code 5051 – Change NMI Details – Retrospective		
27.1	APPLICATION [5054 5055]	Confirmation required that the correct section has been referenced in the following statement: Section 25 applies to the following Change Reason Codes		
28.1	APPLICATION [5060 5061]	Confirmation required that the correct section has been referenced in the following statement: Section 26 applies to the following Change Reason Codes		
29.1	APPLICATION [5080 5081]	Confirmation required that the correct section has been referenced in the following statement: Section 27 applies to the following Change Reason Codes		

30.1	APPLICATION [5090 5091]	Confirmation required that the correct section has been referenced in the following statement: Section 28 applies to the following Change Reason Codes		
31.1	APPLICATION [6100 6110]	Confirmation required that the correct section has been referenced in the following statement: Section 29 applies to the following Change Reason Codes Suggested change to include 'New' for ENM as this transaction is limited to a New LNSP, likewise should be applied to a New ENM CR6100 Used where the New LNSP or the New ENM is required (either by a regulatory change or due to an error in the NMI Master Record) to apply a Prospective Change to the name of the Current LNSP in MSATS CR6110 Used where the New LNSP or the New ENM is required (either by a regulatory change or due to an error in the NMI Master Record) to apply a Retrospective Change to the name of the Current LNSP in MSATS		
31.3	INITIATION ROLES	Suggested change to include 'New' for ENM as this transaction is limited to a New LNSP, likewise should be applied to a New ENM. A New LNSP or New ENM may initiate a Change Request to change a LNSP in MSATS in accordance with section 31.4.		
31.4	LNSP or ENM	Suggested change to include 'New' for ENM as this transaction is limited to a		

	Requirements	New LNSP, likewise should be applied to a New ENM. The New LNSP or New ENM must		
31.5	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day logging period has passed by the next business day. The proposed change is not supported and should remain at 5 business days. This is further explained in section 12 below.		
32.1	APPLICATION [6200 6210]	Confirmation required that the correct section has been referenced in the following statement: Section 30 applies to the following Change Reason Codes		
32.6	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodgement period has passed by the next business day. The proposed change is not supported and should remain at 5 business days. This is further explained in section 12 below.		
33.1	APPLICATION [6300 6301]	Confirmation required that the correct section has been referenced in the following statement:		

		Section 31 applies to the following Change Reason Codes		
33.5	TIMEFRAME RULES	<p>Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodgement period has passed by the next business day.</p> <p>The proposed change is not supported and should remain at 5 business days.</p> <p>This is further explained in section 12 below.</p>		
34.1	APPLICATION [6400 6401]	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>Section 32 applies to the following Change Reason Codes</p>		
34.5	TIMEFRAME RULES	<p>Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodgement period has passed by the next business day.</p> <p>The proposed change is not supported and should remain at 5 business days.</p> <p>This is further explained in section 12 below.</p>		
35.1	APPLICATION [6421]	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>Section 33 applies to the following Change Reason Codes</p>		

35.5	TIMEFRAME RULES	<p>Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodgement period has passed by the next business day.</p> <p>The proposed change is not supported and should remain at 5 business days. This is further explained in section 12 below.</p>		
36.1	APPLICATION [6500 6501]	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>Section 34 applies to the following Change Reason Codes</p>		
37.1	APPLICATION [6700 6701]	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>Section 35 applies to the following Change Reason Codes</p>		
37.5	TIMEFRAME RULES	<p>Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodgement period has passed by the next business day.</p> <p>The proposed change is not supported and should remain at 5 business days. This is further explained in section 12 below.</p>		

38.1	APPLICATION [6800 6801]	Confirmation required that the correct section has been referenced in the following statement: Section 36 applies to the following Change Reason Codes		
38.4	FRMP Requirements	Confirmation required if the correct acronym has been applied in the table for: (d) Populate a Change Request with one or more of the following As per the proposed table the role has been updated as MC where the role code is RP		
38.7	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. In the case of jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodgement period has passed by the next business day. The proposed change is not supported and should remain at 5 business days. This is further explained in section 12 below.		
39.1	APPLICATION [ECLR]	Confirmation required that the correct section has been referenced in the following statement: Section 37 applies to the following Change Reason Codes		
40.1	APPLICATION [EPFR]	Confirmation required that the correct section has been referenced in the following statement: 'Section 38 applies to the following Change Reason Codes'		

41.1	APPLICATION [5100 5101]	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>Section 39 applies to the following Change Reason Codes</p> <p>For consistency suggested change:</p> <p>CR5100</p> <p>Used where AEMO identifies a requirement for an urgent Prospective Change (i.e., in less time than it would take to change that data item, because of the allowance for an Objection Logging Period) to MSATS data about a <i>connection point</i> or where several data items that normally can't be changed in the same transaction must be changed at the same time.</p> <p>CR5101</p> <p>Used where AEMO identifies a requirement for an urgent Retrospective Change (i.e., in less time than it would take to change that data item, because of the allowance for an Objection Logging Period) to MSATS data about a <i>connection point</i> or where several data items that normally can't be changed in the same transaction must be changed at the same time.</p>		
42.1	INTRODUCTION	<p>Confirmation required that the correct section has been referenced in the following statement:</p> <p>(c) Section 40 covers changes to the following <i>NMI Standing Data</i> items</p>		

6. MSATS Procedures: MDM Procedures

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
3.2	Setup Functionality	3.2.3. Characteristics of the NSLP Profile (b) & (c) have the term Basic. We recommend that for consistency throughout the procedures this should be updated to Accumulation +++++		
		3.2.6. MDM Settlement Data Processing, the following statement is to be updated from Basic to Accumulation for consistency: Settlement Data Processing consists of profile calculation (Profile Preparation Service for non NSLP and NSLP), profile application (Basic Meter Profiling for non NSLP and NSLP) and settlement energy (load) aggregation +++++		
		3.2.7 Processing Functionality, same comment as above update Basic to Accumulation +++++		
		3.2.8. Profile Preparation Service (PPS) same comment as above update Basic to Accumulation		

		<p>+++++++</p> <p>3.2.9. Basic Meter Profiling (BMP) same comment as above update Basic to Accumulation. In this case the acronym will change and will require updates throughout all procedures and documents where this is applied.</p> <p>+++++++</p> <p>3.2.10 Settlement Load Aggregation same comment as above update Basic to Accumulation</p> <p>+++++++</p> <p>3.2.11. Processing Overview same comment as above update Basic to Accumulation.</p>		
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7. MSATS Procedures: Procedure for the Management of WIGS NMI

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
N/A				

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

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
N/A				

9. NMI Standing Data Schedule

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
N/A				

10. Service Level Procedures for MDP

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
2.3	Specific obligations for	Recommendation that the following subclause is updated to include 'market child connection point' as an off market child connection point is within and		

	MDP - Category D	<p>embedded network.</p> <p>(ii) where the connection point has moved within an embedded network and is not a child connection point</p> <p>+++++++</p> <p>Recommendation that the following clause from the current MDP SLP procedure replaces (i) de-activate Datastreams in MSATS only within this section so as to broaden the scope as to when a Datastream is de-activated and not limit it to the current scenarios provided.</p> <p>(h) ensure that there is no continued metering data being recorded for the connection point before deactivating the data stream(s) in MSATS or discontinuing the collection process from the metering installation</p>		
3.3	Specific collection process requirements for metering installations type 1, 2, 3 and 4	<p>Confirmation is required from AEMO as to the heading for this section as the draft (clean) procedures currently has:</p> <p>3.3. Specific Collection Process Requirements for Metering Installations with Remote Acquisition of Metering Data.</p>		
3.4	Specific collection process requirements for metering installations type 4A, 5 and 6	<p>Confirmation is required from AEMO as to the heading for this section as the draft (clean) procedures currently has:</p> <p>3.4. Specific Collection Process Requirements for Manually Read Metering Installations</p>		

3.10	Delivery performance requirements for metering data	Recommend that 6.11.9 Summary Data Delivery Table which is in the current MDP SLP procedure is reinstated with the removal of (f), (g) & (h) which provides the information in a clear and understandable method.		
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11. Service Level Procedures for MP

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments		
		Metering Competition	Embedded Networks	Meter Replacement Processes
N/A				

12. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments
MSATS Procedures: CATS Procedure Principles and Obligations	All	Application	<p>Incorrect Section references, in some cases 'Section 0' is referenced within a statement. E.g. 8.1</p> <p>Please note that the appropriate Change Request for a LARGE NMI is CR 1020 – Change Retailer – Retrospective – Long Term / Error (not SMALL3). More information about this Change Request is provided in Section 0.</p> <p>Due to time constraints, this has not been highlighted for each section where this occurs throughout the draft Procedure document within Red</p>

Document	Clause	Heading	Participant Comments
			<p>and Lumo's response.</p> <p>The final version of this and other Procedures which make reference to a particular section are to be cross referenced to ensure the correct Procedure, section and reference to the NER, inclusive of clause, is provided.</p>
MSATS Procedures: CATS Procedure Principles and Obligations		Timeframe Rules	<p>Red and Lumo strongly object to the objection timeframes being amended. AEMO has been very clear and consistent that the scope of this consultation is only in relation to the three rule changes. Therefore, it is inappropriate for AEMO to propose a change to the objection windows, further the reduction the number of days from 5 to 1 for a participant to log an objection during this consultation. Red and Lumo would like AEMO to highlight where this change is described in the final rule changes for Metering Competition, Embedded Networks and the Meter Replacement Processes.</p> <p>We consider that the outcome of the two current rule changes, Improving the Accuracy of Customer Transfers and Using Estimated Reads for Customer Transfers, may impact the objection timeframes. However, these rules are still in consultation, as such it is premature for AEMO to amend the current objection windows without allowing the AEMC to complete its review.</p> <p>This change can have a significant impact on our business and our business processes. As noted above, the current proposal of one business day for a participant to investigate and determine if an objection is to be submitted with the relevant objection code is an insufficient timeframe. In the case of</p>

Document	Clause	Heading	Participant Comments
			<p>jurisdictional public holidays, e.g. Melbourne Cup Day, an objection could not be submitted as the proposed one day lodging period has passed by the next business day. We consider that this change may force participants to automate an objection and then review to remove the objection, which is not in the spirit of the Procedures. Further, we recommend that AEMO discuss their proposed approach with industry participants particularly in light of changes resulting from the hardship review in Victoria that are currently progressing.</p> <p>Red and Lumo strongly urge AEMO to retain the existing 5 business days for an objection period. Should you wish to discuss our issue with the objection window change, we would welcome that discussion.</p>
MSATS Procedures: CATS Procedure Principles and Obligations	26	MAINTAIN NMI – CHANGE A NMI – SMALL OR LARGE	<p>4.5.4 AEMO’s conclusion</p> <p>NMI Status Update Obligation</p> <p>AEMO will remove the new NMI status of “R” and will insert a new Meter Register Status of “D” at the Meter level where the responsibility will be on the MP to update for remote disconnections and remote reconnections. Remote Disconnection Status at Meter Level</p> <p>AEMO will add a Meter Register Status of “D” at the meter level for remote disconnection.</p> <p>In relation to the above conclusion from AEMO’s Draft Report and Determination, Red/Lumo Energy has an alternative suggestion.</p> <p>The proposal is for two new fields within NMI Standing Data:</p>

Document	Clause	Heading	Participant Comments
			<p>Field Name: De-energisation Status Requirement: Mandatory if the NMI Status Code field is “D” and invalid for all other codes. Modifiable By: LNSP or MPB – whoever undertakes the work. Description: This field will allow all market participants to easily identify the method used to de-energise a site and will assist participants in providing clear and correct advice to a customer around the method, timeframes and charges to re-energise a site.</p> <p>Field Name: De-energisation Date Requirement: Mandatory if the NMI Status Code is “D”, invalid for all other codes. Modifiable By: LNSP or MPB – whoever undertakes the work. Description: This field will allow participants, particularly prospective FRMPs, to see how long a site has been de-energised when arranging a re-energisation. This will allow pro-active requests for safety certificates where a site has been disconnected for over 12 months. (Requirement in Victoria)</p>

Document	Clause	Heading	Participant Comments												
			<div><div><div><div>Obtain Standing Data - Results</div><div>Participant ID: VEPL</div><div>Participant Name: Lumo Energy Australia Pty Ltd</div></div><div><div>Go to: View Data Streams View Participant Relationships View Meter Registers</div><div><div>General Information:</div><div><div>NMI:</div><div>Classification Code: SMALL</div><div>Embedded Network ID (Parent):</div><div>Embedded Network ID (Child):</div><div>Start Date:</div><div>NMI Status Code: D</div><div>De-energisation Status: R</div><div>Jurisdiction: VIC</div><div>Aggregate Flag:</div><div>TNI Code: VRT7</div><div>DLF Code: ELVE</div><div>End Date:</div><div>Updated On:</div><div>De-energisation Date: 01/07/2016</div></div></div><div><div>Address Information:</div><div><div>Building/Property Name:</div><div>Location Descriptor:</div><div>Lot Number:</div><div><div>Flat/Unit</div><div>Type: Number:</div><div>Floor/Level</div><div>Type: Number:</div><div>Street</div><div>House Number: Name: Type:</div><div>House Number Suffix: Name Suffix:</div><div>Suburb/Locality: State: Postcode:</div><div>DPID:</div></div></div></div></div><div><p>The below table provides the proposed new fields and usage dependent on the NMI Status Code field:</p><table><tr><th>NMI Status Code</th><th>De-energisation Status</th><th>De-energisation Date</th></tr><tr><td>G</td><td>N/A</td><td>N/A</td></tr><tr><td>A</td><td>N/A</td><td>N/A</td></tr><tr><td>D</td><td>Mandatory:</td><td>Mandatory</td></tr></table></div></div></div>	NMI Status Code	De-energisation Status	De-energisation Date	G	N/A	N/A	A	N/A	N/A	D	Mandatory:	Mandatory
NMI Status Code	De-energisation Status	De-energisation Date													
G	N/A	N/A													
A	N/A	N/A													
D	Mandatory:	Mandatory													

Document	Clause	Heading	Participant Comments		
				F (fuse removed) S (sticker) R (remote) P (pole-top or pillar) T (technical e.g. meter load tails)	
			X	N/A	N/A
			The responsibility for updating these fields via a CR 5050/5051 would be the participant who completed the work, whether it be the LNSP or MPB. This proposal benefits Retailers when undertaking a NMI Discovery to ascertain the type of re-energisation required, Distributors and Meter Providers can use of one change request to update the relevant fields. We consider this recommendation an efficient solution, and would be happy to discuss with AEMO should further suggestions or clarification be required.		
Metrology Procedure: Part B	2	PRINCIPLES FOR VALIDATION, SUBSTITUTION AND ESTIMATION	Recommendation is that ‘forward’ is reinstated within this procedure in line with AEMO’s Settlements Estimation Guide references E = Forward Estimate. The work undertaken by participants to include this term within the 2013 Procedure should not go to waste. The term ‘forward estimate’ continues to be used today in forums and workshops with an understanding by Industry participants of its representation.		

Document	Clause	Heading	Participant Comments
			<p>Forward Estimation</p> <p>The term “estimate”, as related to the creation of metering data for a period in the future, has been replaced with the term “forward estimate”.</p> <p>The change to remove ‘forward’ is not supported throughout the proposed changes to this Procedure.</p>
MSATS Procedures: CATS Procedure Principles and Obligations	20	MAINTAIN METERING – CHANGE NETWORK TARIFF CODE – SMALL OR LARGE	<p>4.8.4 AEMO’s conclusion</p> <p>AEMO will make the Network Tariff Code field mandatory for Metering Providers.</p> <p>AEMO is not proposing to specify any timeframes for the LNSP to update the Network Tariff Code.</p> <p>Red and Lumo agree with the Network Tariff Code field being a mandatory field. Unless otherwise agreed between the LNSP and the MP, under certain circumstances, this obligation is to remain with the LNSP.</p> <p>In relation to the statement included within the Draft Report and Determination, 4.8.3 AEMO’s assessment below:</p> <p>‘AEMO notes concerns about MPs not having access to the Network Tariff Code information, and that LNSPs are not required by the NER to provide it to MPs.’</p> <p>Red and Lumo propose that the C4 report is provided to the New MPB at the requested status. This will assist the New MPB with the current</p>

Document	Clause	Heading	Participant Comments
			information of a site and reduce the need to contact the LNSP.