

SP AusNet Submission on Draft Rule Determination on National Electricity Amendment (Metrology) Rule 2006



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SP AusNet submits these comments to the AEMC in response to its Draft Determination on National Electricity Amendment (Metrology) Rule 2006. The submission consists of two parts:

- general comments regarding the Draft Determination and the SP AusNet submission, and
- comments arising from our consideration of specific Draft Rule provisions.

A General Comments

1 Drafting Framework and Staged Approach

NEMMCO and the industry, through the Metrology Reference Group (MRG), carried out the review of the Rules Chapter 7 within a very constrained set of drafting rules designed around the understanding that this change was the first round of at least three programmed changes to the Rules and the Metrology Procedure.

The Rules proposed included only what NEMMCO and the MRG considered to be absolutely necessary rewording, restructuring and re-arrangement of the current document, and minimal change to clause numbering. This was designed to enable easy understanding of the necessary changes and recognised that the third project in the program would involve a major change to structure which would clean up minimalist drafting legacy.

The Draft Rule significantly re-arranges the Chapter and reformats the NEMMCO/industry drafted wording in a way that does not appear to recognise this staged revision plan. This has made reconciliation of the Draft Rule with the originally proposed NEMMCO/MRG amendments and with stakeholder comments difficult. We consider that this has unnecessarily complicated the industry's process for commenting on the Draft Rule.

Importantly, with the second stage of the Rules re-drafting now being undertaken by NEMMCO and the MRG, and the final stage to be undertaken next year, we consider it is desirable that the industry proposed Rule changes should be consistent with an approach acceptable to the AEMC. Possibly improved coordination between the MRG and the AEMC during the second stage work would facilitate this outcome and ultimately result in a more effective and efficient process for NEMMCO and industry, and for the AEMC.

2 Issues Raised in Previous Consultation Phase

The Draft Determination and Draft Rule do not deal with a number of the items raised in our submission on the Rule Change Proposal.

We acknowledge that some of the items in our submission have been incorporated in the Draft Rule, and also that the AEMC has specifically identified some other items as being out of scope. A number of items which were included in our original submission which were of a broad nature and were included because we considered it important for AEMC to understand the context of the proposed changes in the wider context of metrology change. We accept that a number of these items could be considered out of scope for this round of Chapter 7 Rule changes.

However having reviewed the Draft Rule we remain of the view that there are many Items in our submission that deal with material issues or documentation detail that need to be addressed. We have therefore raised these issues again in this submission, and have cross-referenced these against the

related items in our original submission. We have attempted to provide more understanding of the impact of the issue raised, and have more often suggested wording changes to overcome the issue.

SP AusNet would welcome the opportunity to discuss these items with the AEMC.

Additionally, as a member of the MRG we would welcome the opportunity to discuss the approach to overall development of the metrology Rules package, to facilitate the efficient utilisation of resources and ultimately a clear, workable Rules package.

3 SP AusNet Drafting Convention

To facilitate the drafting of our comments we have used the following terminology for the two type 4 meter "sub types":

| | | |
|--------------|---|--|
| type 4 large | = | a Type 4 meter meeting the requirements of clause 7.11.1 (b) ie daily delivery capability and actual/substituted data to support all settlements |
| type 4 small | = | a Type 4 meter meeting the requirements of clause 7.11.1 (c) ie daily delivery not required and forward estimates to support some settlements |

B SP AusNet Comments on Specific Clauses

The following table provides detailed comments on specific provisions and offers suggested amendments:

| SP AusNet Item No | Clause | Previous Submission Item No | Impact L/M/H | Issue/concern | Suggested Wording |
|-------------------|-----------|-----------------------------|--------------|--|--|
| 1 | 7.2.2 (a) | - | L | <p>If under clause 7.2.4 the installation is a “joint metering installation” then a party other than the Market Participant (the Retailer) may be the RP.</p> <p>If addition is not made to current wording this exception could be overlooked.</p> | <p>(a) <i>A Market Participant</i> may elect to be the <i>responsible person</i> for a type 1, 2, 3 or 4 metering installation <u>except for a joint metering installation where another Market Participant may be agreed or nominated by NEMMCO.</u></p> |
| 2 | 7.2.2 (b) | 11 | M | <p>Whereas this clause is applicable for a type 1, 2, 3, 4 installation it is not applicable to a type 5, 6, 7 installation. If the Market Participant breaches the agreement then the LNSP as the RP can “appeal” to the Regulator but must continue to be the RP. The role for a type 5, 6, 7 installation cannot fall back to the Market Participant.</p> <p>If left as currently drafted the clause will NOT be consistent with current accepted practice.</p> | <p>(b) <i>A Market Participant</i> will be the <i>responsible person</i> for a <i>metering installation</i> if an agreement under clause 7.2.3 <u>for a type 1, 2, 3, 4 metering installation</u> is terminated due to a breach by the <i>Market Participant</i>.</p> |
| 3 | 7.2.3 (a) | 3 | H | <p>Whilst SP AusNet recognise that, although significantly reworded, the fundamental meaning of this Clause has not changed, SP AusNet have concerns re its potentially misleading nature in that it implies that the LNSP is the “default” RP for all meter types.</p> <p>This would imply that if:</p> <ul style="list-style-type: none"> a Retailer approached a LNSP for a connection with a requirement for a Type 1-4 meter but did not nominate an RP, that the LNSP must nominate themselves as the RP. SP AusNet does not consider that should be the case. SP AusNet would push the request back to the Retailer in this case, but if ultimately the customer needed supply then SP | <p>The <i>Local Network Service Provider</i> is the <i>responsible person</i> for :</p> <p>(a) <u>any type 5, type 6, or type 7 metering installations</u> connected to, or proposed to be connected to, the <i>Local Network Service Provider’s</i> network <u>in accordance with clause 7.2.2 (d) to (h)</u></p> <p>(b) <u>any type 1, type 2, type 3 or type 4 metering installation</u> connected to, or proposed to be connected to, the <i>Local Network Service Provider’s</i> network <u>where the Market Participant has accepted the Local Network Service Provider’s offer made in accordance with clause 7.2.2 (b) and (c)</u></p> |

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| | | | | <p>AusNet might create the NMI with the <i>FRMP</i> as the RP.</p> <ul style="list-style-type: none"> the LNSP through error may accepted a connection request and established a NMI without a <i>FRMP</i> nominated RP however even then the NMI could <u>not</u> enter the market as the RP field is a mandatory one in MSATS. a customer established a connection by illegal means that the LNSP would be the RP <p>SP AusNet consider that in each of these scenarios the LNSP should NOT be the RP.</p> <p>If left as currently drafted the clause will NOT be consistent with current accepted practice and impose undesirable responsibilities onto the LNSP.</p> | |
| 4 | 7.2.3 (d) to (h) | 7 | M | <p>Whilst SP AusNet recognise that the content of this Clause has been taken largely from the derogation, and hence represents a “soft” change, the wording is a long way off describing the actual processes which are applicable for meter installations which are the responsibility of the LNSP (types 5, 6, 7).</p> <p>If left as currently drafted the clause will NOT be consistent with current accepted practice and would leave the B2B Procedures inconsistent with the Rules and, given the rules hierarchy, in breach of the Rules.</p> | These processes are defined in the B2B Procedures and can be loosely mapped to the AEMC drafted words as per the Appendix A table in this submission. This table provides suggested wording for new clauses which are more consistent with the B2B processes used by industry. |
| 5 | 7.2.3 (b) and (d) and | Refer SP AusNet | H | In the Victorian Advance Interval Meter Rollout (AIMRO) initiative the meter being rollout out will, under this Rules | It is unclear to SP AusNet how this will be established in the Rules. This could perhaps be via a <i>jurisdictional meterology</i> |

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| | headings | comments re AIMRO support in Item 3 | | change, be defined as a type 4 meter. However under the proposed Order in Council being drafted by the Victorian Government the LNSPs must establish in conjunction with the Regulator a fair and reasonable price for the rolled out meters. Hence the process detailed in (d) to (h) will be applicable to these type 4 meters and not restricted to type 5, 6, 7 as per current wording. | <p><i>material</i> submission by the Victorian minister, however SP AusNet consider that a more integrated set of words should be included in this drafting effort.</p> <p>This would better provide the long term support for the LNSPs role in the rollout. If this is considered out of scope of this Rules change then SP AusNet's expectation would be for AEMC to indicate to industry its preferred approach so that this can be appropriately covered in the next round of Chapter 7 changes.</p> |
| 6 | 7.2.3 (h)(2) | 8 | H | <p>This sub clause should be relocated and redrafted:</p> <ul style="list-style-type: none"> the LNSP's obligation to provide NMI is applicable irrespective of whether the Market Participant accepts the offer from the LNSP, or rejects the offer and becomes the RP themselves. The reworded clause should hence be relocated to become new clause 7.2.3 (ab). A NMI is allocated to a <i>connection point</i> not to a metering installation The 10 days from "connection agreement" is inconsistent with other regulatory documents and inconsistent with current practice <p>In Victoria the Distribution License requires the NMI to be issued prior to connection.</p> <p>The Electricity Customer Metering Code states</p> <p>(2) each <i>distributor</i> is required to provide to <i>NEMMCO</i> the <i>NMI</i> and each item of <i>NMI standing data</i> in respect of each <i>supply point</i> for which it is the</p> | <p>7.2.3 (ab) The <i>Local Network Service Provider</i> must provide <i>NEMMCO</i> with the <i>NMI</i> for the metering installation <i>connection point</i> within <u>two business days of the minimum required data for initiation of the appropriate Change Request in MSATS becoming available</u>. 10 business days of entry into a connection agreement under rule 5.3.7 with that Market Participant.</p> |

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| | | | | <p><i>distributor</i>;</p> <p>(3) a <i>distributor</i> must supply the information referred to in sub-paragraph 3.1(a)(2) as soon as practicable and in any event <u>within two Victorian business days</u> of becoming aware of a change to an item of data;</p> <p>This has been interpreted as within two days of it being generated for a new connection.</p> <p>The CATS Procedure states</p> <p>new LNSP must:</p> <p>(a) Create a NMI master record for each consumer supplied within its area with the minimum required data for initiation of the appropriate Change Request in MSATS. This must be done <u>within two business days</u> of the minimum required data becoming available.</p> <ul style="list-style-type: none"> • “connection agreement” is not a concept which makes “practical” sense with respect to the majority of customers/connection points which are covered not be any specific dated agreement but rather by the deemed connection agreement. <p>If the clause is left as currently drafted the clause will NOT be consistent with current accepted practice and would leave other regulatory documents inconsistent with the Rules and, given the rules hierarchy, without Rules “support”.</p> | |

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| 7 | 7.2.5 (a)(1) | - | L | If the LNSP is an accredited Metering Provider then they do not require to “engage a metering provider” | <p>(a) The <i>responsible person</i> must, for each <i>metering installation</i> for which it is responsible:</p> <p>(1) <u>unless the responsible person is the Local Network Service Provider and a Metering Provider</u>, engage a <i>Metering Provider</i> for the provision, installation and maintenance of that installation; or</p> |
| 8 | 7.2.5 (a)(2) | 4 | L | <p>If the concept of Accredited Service Providers (ASP) is going to be recognised in the <i>Rules</i> by virtue of Schedule S7.4.2 and S7.4.5 then SP AusNet consider that this clause should more specifically recognise that ASPs are the exception and state this clearly.</p> <p>This will establish the new category of Metering Provider accreditation of ASP more clearly.</p> | <p>(a) The <i>responsible person</i> must, for each <i>metering installation</i> for which it is responsible:</p> <p>(2) subject to the <i>metrology procedure</i>, allow another person to engage a <u>Accredited Service Provider</u> Metering Provider to install that installation.</p> |
| 9 | 7.2.5 (b)(ii) | 6 | M | <p>If an ASP installs the meter it is obvious that the RP then has to appoint a MP to carry out the ongoing maintenance of the installation; however SP AusNet consider that the other two “aspects” of the installation need to be also specifically covered.</p> <ul style="list-style-type: none"> • The meter needs to be provided by a <i>Metering Provider</i>, and • the installation needs to be tested, including tested into service/commissioned, by a <i>Metering Provider</i>. | <p>(b) Where a <i>Metering Provider</i> has been engaged under paragraph (a), the <i>responsible person</i> must:</p> <p>(1) enter into an agreement with a <i>Metering Provider</i>:</p> <p>(i) for the provision, installation and maintenance of the <i>metering installation</i> by the <i>Metering Provider</i>, where the <i>responsible person</i> has engaged the <i>Metering Provider</i>; or</p> <p>(ii) for the <u>provision, testing, and</u> maintenance of the <i>metering installation</i>, where another person has engaged the <u>Accredited Service Provider</u> Metering Provider;</p> |

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| 9 | 7.2.5 (a) & (b) | - | L | <p>Wording is convoluted and not consistent.</p> <p>Also the wording could suggest that “engage” and “enter into an agreement” are different action. SP AusNet would consider that an RP would engage a Metering Provider by entering into an agreement with them.</p> <p>Clause (2) re provision of metering installation details to</p> | <p>Engagement of a Metering Provider</p> <p>(a) <i>The responsible person</i> must, for each <i>metering installation</i> for which it is responsible:</p> <p>(1) <u>enter into an agreement with</u> engage a <i>Metering Provider</i> for the provision, installation <u>if appropriate under paragraph (b)</u>, and maintenance of that installation; or</p> <p>(2) subject to the <i>metrology procedure</i>, allow another person to <u>enter into an agreement with</u> engage a <u>Accredited Service Provider</u> Metering Provider to install that installation.</p> <p>(b) <u>The agreement reached</u> Where a Metering Provider has been engaged under paragraph (a), the responsible person must <u>be for</u>:</p> <p>(1) — enter into an agreement with a Metering Provider;</p> <p><u>(1)(i)</u> for the provision, installation and maintenance of the <i>metering installation</i> by the <i>Metering Provider</i>, where the <i>responsible person</i> has engaged the <i>Metering Provider</i>; or</p> <p><u>(2)(ii)</u> for the <u>provision, testing, and</u> maintenance of the <i>metering installation</i>, where another person has engaged the <u>Accredited Service Provider</u> Metering Provider; and</p> <p>(2) — provide NEMMCO with the relevant details of the metering installation as specified in schedule 7.5 within 10 business days of entering into an agreement</p> |

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| | | | | NEMMCO is not associated with “ Engagement of a metering provider ” and should be relocated to (d) under Metering installations | under subparagraph (1) for that connection point. |
| 10 | 7.2.5 (c) | - | M | SP AusNet are concerned that this clause could imply that the Rules overwrite commercial agreements which are the basis of the RP and Metering Provider relationship. | The <i>responsible person</i> may negotiate elect to terminate an agreement entered into under paragraph (b)(1)(i) after the the <i>metering installation</i> is installed and may enter into a new agreement with another <i>Metering Provider</i> for the maintenance of the <i>metering installation</i> . |
| 11 | 7.2.5 (d) | - | L | Clause (2) re provision of metering installation details to NEMMCO is not associated with “ Engagement of a metering provider ” and should be relocated to (d) under Metering installations | (?) provide <i>NEMMCO</i> with the relevant details of the metering installation as specified in schedule 7.5 within 10 <i>business days</i> of entering into an agreement under paragraphs (a) and (b) for that connection point. |
| 12 | 7.2.5 (d) | 12 | M | The Rules must be more specific in the use of “provide” and “ensure” with respect to the RP role: <ul style="list-style-type: none"> eg subparagraph (6) The responsibility for providing and maintaining security controls for metering installations is allocated to the <i>metering provider</i> in clause 7.4.1(b) and hence this clause should be for the RP to “<u>ensure</u> provision and maintenance” rather than the actual “provide and maintain”. Similar changes should be made to subparagraphs (5), (6), (7) <p>SP AusNet considers that it is important to ensure that the RP responsibilities are clearly and specifically defined.</p> | Change wording to “ensure” rather than “provide” |
| 13 | 7.2.5 (d)(9) | 14 | H | SP AusNet are concerned re the current wording in these Rules with respect to meter changes. The concept of “allow” is unclear when used in conjunction with the practical processes involved. Does this mean “must not | Changes in clause 7.3.4 should be reflected into this subparagraph. |

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| | | | | <p>object to a <i>Market Settlements and Transfer Solution Procedures</i> change request or ??</p> <p>Refer comments under clause 7.3.4</p> | |
| 14 | 7.2.5 (e) | 15 | H | <p>Refer SP AusNet's comments with respect to meter change before transfer in Appendix B</p> <p>In Appendix B SP AusNet have detailed the issues associated with RP, meter, Metering Provider, and FRMP not all changing on the same day, and the implications on Rules compliance during the period when these parties are out of alignment.</p> <p>SP AusNet consider that there is a regulatory risk during this period which must be overcome by appropriate Rules wording.</p> <p>SP AusNet are unclear what is intended by the words in (e)(1): "for the period within the day"</p> | <p>Refer SP AusNet proposed wording in Appendix B Section (i) RP role during meter churn period</p> <p>Revised wording to clarify meaning.</p> |
| 15 | 7.3.1 (e) | - | L | <p>The requirement for the LNSP to issue a NMI is more appropriately relocated to clause 7.2.3.</p> | <p>The requirement is incorporated in the SP AusNet suggested revised wording to 7.2.3 (h)(2) Refer Item 06. Note the comment under that Item that a NMI is allocated to a connection point not a metering installation</p> |
| 16 | 7.3.1 (f) | - | L | <p>The LNSP registers the NMI with NEMMCO NOT the RP.</p> <p>Current Draft Rules wording is inconsistent with obligations and practice.</p> | <p>Remove the clause.</p> |

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| 17 | 7.3.1 (g) | - | M | A metering installation is fundamentally, and mostly only, used to provide metering data to NEMMCO AND to the relevant market Participants (FRMP, LR, LNSP). The intent of this clause is to ensure no interference to the fundamental uses, if there are other uses. If the clause is left as drafted, although probably not incorrect, the key emphasis regarding "additional" use of data is somewhat dissipated. | Where a <i>metering installation</i> is used for purposes in addition to the provision of <i>metering data</i> to NEMMCO <u>or to relevant market Participants</u> then: <ul style="list-style-type: none"> (1) that use must not cause an infringement of the requirements of the <i>Rules</i>; (2) the <i>responsible person</i> must co-ordinate with the persons who use the <i>metering installation</i> for such other purposes; and (3) the <i>metering installation</i> must comply with the requirements for operational <i>metering</i> as detailed in Chapter 4 <u>and Chapter 7</u> of the <i>Rules</i>. |
| 18 | 7.3.4 (e) (h) and (i) | 14 | H | <p>SP AusNet still have a range of issues associated with this aspect of the Rules as currentlyrafted.</p> <p>SP AusNet recognises that, unless prevented by Jurisdictional policy,</p> <ul style="list-style-type: none"> (i) The <i>FRMP</i> for a site (ie current MSATS nominated Retailer) must be able to arrange for: <ul style="list-style-type: none"> (a) the "upgrading" of a metering installation from type 5 or type 6 (where the LNSP is the RP) to a type 4 "large", type 4 "small" or "better" metering installation (where the RP role is "contestable"). (b) the change of a contestable meter (ii) The industry expectation is that a "pending <i>FRMP</i>" or "incoming <i>FRMP</i>" for a site must also have the same ability, to carry out both (a) and (b) above, <u>before</u> the retailer transfer date. | Refer Appendix B for detailed analysis of existing clauses and SP AusNet recommended wording changes. |

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| | | | | <p>Although the change of a meter before transfer has a number of issues, we pragmatically recognise that this is a current industry standard practise and that the clauses in the <i>Rules</i> need to support these requirements.</p> <p>We consider that the Rules must recognise the issues and ensure there are no “regulatory” barriers, whilst protecting the “rights” of all involved parties.</p> <p>Refer Appendix B for detailed analysis of existing clauses and SP AusNet recommended wording changes.</p> | |
| 19 | 7.3.6 (f) | 19 | M | <p>Whilst SP AusNet welcomes the new clause (g) which recognises the potential impact on the regulated LNSP of meter changes, we have had some more thoughts with respect to this clause 7.4.3(f) re FRMP responsibilities for meter installation costs. We cannot understand how the costs of meter provision would be met by other than the FRMP. Even if the costs of metering was not subject to an identifiable metering excluded service or prescribed service fee and was therefore part of the DuoS charge the costs would still be paid by the FRMP (prior to their possible recovery of these costs from the customer).</p> | Eliminate clause 7.3.6 (f) as the FRMP will always meet metering costs. |
| 20 | 7.9.4(b) + 7.9.4(d) + 7.9.5 (a) to (c) | 23 | M | <p>Whilst the redrafting has added “estimation” to “clarify the breadth of these procedures” this clause and the others notated above fail to recognise that most of the validation, estimation and substitution is carried out not in the metering database by NEMMCO and their agents, but in the metering installation database by the RP and their <i>metering providers</i>.</p> | Add new clause 7.9.4 (ab) defining the RP and Metering Provider role in validation and substitution, and revise other clauses to recognise that they are applicable to NEMMCO or to the RP. |

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| | | | | <p>SP AusNet recognise that NEMMCO do have the responsibility for higher level validation, and do estimation and substitution if the RP's <i>metering provider</i> fails to deliver to meet settlements. SP AusNet consider that these aspects must be recognised separately in the <i>Rules</i> to the roles of the RP and the <i>metering provider</i>.</p> <p>If the Rules current wording remains unchanged the data validation and substitution process currently done by the RP and the Metering Providers for type 5, 6 and 7 meter installations has no Rules support!</p> | |
| 21 | 7.11.1 (a) | - | M | Refer to SP AusNet comments on definition of <i>remote acquisition</i> which currently leaves it unclear that remote acquisition applies only to interval meter installations not to remotely acquired consumption data. | Refer suggested changes to definition of <i>remote acquisition</i> . |
| 22 | 7.11.1 (b) | 26 | M | <p>SP AusNet consider that these two clause, whilst copied directly from the current <i>Rules</i>, are not a rigorous and technically correct definition of the timeframes expected for delivery of interval data for a type 4 large metering installation.</p> <p>These were discussed in the MRG and none of the group were able to define what the measures meant ; <i>metering providers</i> in the group who are accredited for type 1-4 meters have not been audited against these measures, but rather against measures more directly related to actual reads undertaken and delivered.</p> <p>(b) Where <i>NEMMCO</i> requires actual <i>metering data</i> </p> | |

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| | | | | <p>(2) within the timeframe required for <i>settlements</i> and prudential requirements specifiedat a level of availability of at least 99% per annum for <i>instrument transformers</i> and other components of the <i>metering installations</i>, not including the <i>communication link</i>;</p> <p>and</p> <p>(3) within the timeframe required for <i>settlements</i> and prudential requirements specified.....at a level of availability of at least 95% per annum for the <i>communication link</i>;</p> <p>SP AusNet's strong preference would be for these two clauses to be removed from the Rules and replaced by clauses the same as used to define the performance of other meter types (type 4 small in clause 7.11.1 (c) and type 5 & 6 in clause 7.11.1 (d)).</p> <p>This would enable the debate re actual performance standards for <u>all</u> meter types to be conducted together during the development of these procedures. This debate could embrace the consideration of actual metering data delivery standards which, as specified in the Metrology Procedure, are also not technically sound or practical and different in approach to those in this clause of the <i>Rules</i></p> | <p>(2) within the timeframe required for <i>settlements</i> specified in the procedures established by <i>NEMMCO</i> under clause 7.14.1(c)(4)</p> <p>(3) in accordance with the performance standards specified in the procedures established by <i>NEMMCO</i> under clause 7.14.1(c)(4).</p> |
| 23 | 7.11.1 (b) | 27 | L | <p>SP AusNet were pleased that our comments re validation and substitution for type 4 large meters were included; however on further thought "estimation" is NOT applicable to type 4 large meters.</p> | Remove "estimation" from 7.11.1 (b) |
| 24 | 7.11.1 (b) | 26 | L | <p>This clause includes the following:</p> <p>or as otherwise agreed between <i>NEMMCO</i> and the</p> | We consider this phrase should be removed. If however there is a specific reason why this option is available, then why is it not available for the other meter types covered within clause |

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| | | | | <p><i>responsible person.;</i></p> <p>SP AusNet cannot understand why this is included</p> | 7.11.1? |
| 25 | 7.11.1 (c) | - | L | <p>Under clause 7.14.1 and specifically subclause (c)(4)(ii) and (iii) the details of timeframe and performance standards for type 4 small meter installations will be in the Metrology Procedure</p> | <p>(c) (2) within the timeframe required for <i>settlements</i> specified in the Metrology Procedure procedures established by NEMMCO under rule 7.14.1(c)(4);</p> <p>(c)(4) in accordance with the performance standards specified in the Metrology Procedure procedures established by NEMMCO under rule 7.14.1(c)(4);</p> |
| 26 | 7.11.2 | 30 | M | <p>SP AusNet have issues with all installations type 1 to type 5&6 (ie large I&C to domestic) having the same rule with respect to the required timetable and other details of replacement or repair requirements.</p> <p>SP AusNet consider that whilst 2 day turnaround on a larger installation is reasonable, the standard for smaller installations should be extended and specific notification removed.</p> <p>If these changes are not made the current industry performance will continue to put industry in breach of this unworkable clause.</p> | Refer SP AusNet earlier submission for suggested wording. |
| 27 | 7.14.2 | 17 | M/H | <p>SP AusNet understand from clause (f) (1) and (2) that the envisaged process for inclusion of jurisdictional government "policy" into the Metrology Procedure is via material in a "separate part of the Metrology Procedure" ie very similar to a jurisdictional derogation.</p> | Wording needs to make process clearer. |

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|-------------------|------------|-----------------------------|--------------|---|---|
| | | | | <p>Presumably:</p> <ul style="list-style-type: none"> • <i>jurisdictional metrology material</i> can cover any Metrology Procedure matter ie clause (d) is only a guide as to what <i>jurisdictional metrology material</i> <u>may</u> contain and it may also contain other matter • if a government(s) want to change the actual wording of the Metrology Procedure (ie nationally consistent change) they would utilise the Amendment to Metrology Procedure process defined in 7.14.4. <p>The wording however is not clear.</p> | |
| 28 | 7.14.2 (g) | - | M | <p>SP AusNet are concerned re the concept of <i>jurisdictional metrology material</i> "derogations" to the Metrology Procedure expiring on a review date without a process of examination of consequences of the removing of the requirement, consultation on the implications, and consideration of any transitional arrangements or period.</p> <p>Such a change could have a major impact on industry Participants systems and processes, and the impacts could lead to a downgrading of performance and/or compliance.</p> | <p>The <i>jurisdictional metrology material</i>, as included in the <i>metrology procedure</i> by NEMMCO, <u>must be reviewed by expires on the review date unless the Ministers of the MCE (or the jurisdictional minister if before 1 January 2009). The amended material will continue to apply until the Ministers of the MCE (or the jurisdictional minister if before 1 January 2009) submit to NEMMCO new <i>jurisdictional metrology material</i> in accordance with this clause 7.14.2 <u>to remove or modify the requirements.</u></u></p> |
| 29 | 7.14.2(a) | - | M | <p>Under current wording the <i>jurisdictional metrology material</i> can only cover type 5, 6, 7 <i>metering installations</i>.</p> <p>A likely requirement as Victoria and other states transition to AIMRO is for jurisdictional changes for type 4 <i>metering installations</i> particularly for type 4 small.</p> | Remove restricting words. |

| SP AusNet Item No | Clause | Previous Submission Item No | Impact L/M/H | Issue/concern | Suggested Wording |
|-------------------|------------------------------|-----------------------------|--------------|--|--|
| 30 | 7.14.2(c)(2) | - | L | SP AusNet are unclear of the meaning and intent of this clause: (2) be provided to <i>NEMMCO</i> within sufficient time for <i>NEMMCO</i> to meet its obligations under this clause 7.14.2; | Clarify wording. |
| 31 | 7.14.3 | 16 | M | The items in 7.14.3 are mandatory coverage of the <i>Metrology procedure</i> and hence the item should be relocated to 7.14.1(c) | The items in 7.14.3 should commence with the "leader phrase" The Metrology Procedure must include: |
| 32 | S7.3.2 Table S7.2.3.1 | 32 | M | Type 4 volume limit The introduction of type 4 small and the related consumption limit above which a type 4 small cannot be used (refer clause 7.14.2 (c)(4)(i)) leads to the situation that the new sub-type of type 4 (ie the type 4 small) cannot to used up to 750 MWh. | Hence the type 4 row in the table must be split into two rows: <ul style="list-style-type: none"> • One for type 4 large with the existing volume limit ie "less than 750MWh", and • One for type 4 small with a volume limit of "crossover volume limit MWh" as determined by NEMMCO as per clause 7.14.2 (c)(4)(i) |
| 33 | S7.3.2 Table S7.2.3.1 | 33 | M | maximum allowable error SP AusNet considers as a principle that the fundamental accuracy and other "fundamental" metrology parameters of a type 4 small and a type 5 should be the same. The aim of having type 4 small is to enable remote reading. There was no drive in the ACCC derogation to improve accuracy etc for what under the Victorian AMI, and probably ultimately nationally, is the mass market meter type. | Hence SP AusNet consider that that Item 3b should be revised by adding the wording "or type 4 small" after type 5 in the clause and adding "(Item 3b)" to type 4 small row in Table S7.2.3.1 |

| SP AusNet Item No | Clause | Previous Submission Item No | Impact L/M/H | Issue/concern | Suggested Wording |
|-------------------|------------------------------------|-----------------------------|--------------|--|--|
| 34 | S7.3.2 Table S7.2.3.1 Items | 34 | L | <p>SP AusNet consider the following wording changes are required to ensure consistency of wording between different Notes covering similar matters:</p> <ul style="list-style-type: none"> i) Item 2a and Item 3a cover identical matters for different meter type and hence should be fundamentally the same. ii) Item 3 and Item 4 cover identical matters for different meter type and hence should be fundamentally the same. <p>Note 3 suggested changes</p> <p>Item 3: The following requirements apply in relation to a type 5 <i>metering installation</i>:</p> <ul style="list-style-type: none"> (1) the installation must comply with the <i>metrology procedure</i> when converting active energy into <i>metering data</i>; (2) the value of “x” must be determined by each <i>Minister of a participating jurisdiction</i> and must be provided to <i>NEMMCO</i> for inclusion in the <i>metrology procedure</i>; (3) the maximum acceptable value of “x” determined under subparagraph (2) must be 750 MWh per annum; (4) the installation may provide delays in transferring the <i>interval energy data</i> to a remote location where access to a telecommunications network has been established; (5) delays under subparagraph (4) must be approved by the relevant <i>Minister of the participating jurisdiction</i> and the approval provided to <i>NEMMCO</i> for inclusion in the <i>metrology procedure</i>; and (6) the <i>metrology procedure</i> must: <ul style="list-style-type: none"> (i) record the value of “x” for each participating jurisdiction, (ii) and identify the method by which estimated energy data is to be prepared <u>indicate how interval energy</u> | <p>Change “relaxed by NEMMCO” in Item 3b “relaxed in the <i>Metrology procedure</i>” as per Item 3a</p> <p>Note 4 suggested changes:</p> <p>Item 4: The following requirements apply in relation to a type 6 <i>metering installation</i>:</p> <ul style="list-style-type: none"> (1) a <i>metrology procedure</i> must include a procedure relating to converting <i>active energy</i> into <i>metering data</i>; (2) the value of “y” must be determined by each <i>Minister of a participating jurisdiction</i> and be provided to <i>NEMMCO</i> for inclusion in the <i>metrology procedure</i>; (3) the maximum acceptable value of “y” determined under subparagraph (2) must be 750 MWh per annum; (4) <u>the installation may provide delays in transferring the accumulated energy data</u> can be transferred to a remote location where access to a <i>telecommunication network</i> has been established; (5) <u>delays under subparagraph (4) must be approved by the relevant Minister of the participating jurisdiction and the approval provided to NEMMCO for inclusion in the metrology procedure; and</u> (56) the <i>metrology procedure</i> must: <ul style="list-style-type: none"> (i) record the value of “y” for each participating jurisdiction; (ii) identify the method by which <i>accumulated energy data</i> is to be converted into trading <i>interval data</i> in accordance with rule 7.9.3(b), and (iii) <u>identify</u> the method by which estimated <i>energy data</i> is to |

| SP AusNet Item No | Clause | Previous Submission Item No | Impact L/M/H | Issue/concern | Suggested Wording |
|-------------------|----------------------|-----------------------------|--------------|--|--|
| 35 | Table 7.2.3.1 Item 6 | 35 | L | <p>Item 6 states that the calculated energy data from a type 7 installation is <i>estimated energy data</i> whereas the definition of <i>estimated energy data</i> in Chapter 10 as stated below specifically rules out estimates being applicable to type 7 non-metered connection points.</p> <p>estimated energy data</p> <p>The data that results from an estimation of the flow of electricity in a power conductor where the data applies to a <i>trading interval</i> or a period in excess of a <i>trading interval</i>. The estimation is made in relation to a <i>market load</i> and would <u>not apply to a metering point</u> where <i>accumulated energy data</i> or <i>interval energy data</i> is not available, or a <u><i>non-metered connection point</i></u>.</p> | SP AusNet consider that Item 6 and the Chapter 10 definition must be consistent. |
| 36 | S7.3.1 Table S7.3.1 | 37 | M | As stated in Item 33 SP AusNet would expect that the type 4 and type 5 meter specs would fundamentally be the same: SP AusNet therefore cannot understand the difference in this table for one parameter. | Relax In Laboratory Maximum Allowable Level of Testing Uncertainty to 0.3/cosΦ% |
| 38 | S 7.4.2(b) | 20 & 38 | M | <p>SP AusNet consider that the <i>metering provider</i> accreditation for a type 4 small metering installation would be different to a type 4 large metering installation.</p> <p>Whilst a type 4 large accreditation is that pertaining to current type 4 installations, the new type 4 small meter data provider <i>metering providers</i> would need to have forward estimating capability, lesser communications standards, ability to deal with next scheduled read date etc (similar to some extent to a manual read meter data provider)</p> | Add another Category to Table S7.4.2 |

| SP AusNet Item No | Clause | Previous Submission Item No | Impact L/M/H | Issue/concern | Suggested Wording |
|-------------------|-------------|-----------------------------|--------------|---|---|
| | | | | <p>There will hence be different service levels associated with the differences between type 4 large and type 4 small metering installations. This would appear to require a new Category 4? to be added to Table S7.4.2</p> <p>Without this NEMMCO would presumably not be compliant with clause S7.4.2(b)</p> | |
| 39 | S 7.4.2(c) | - | M | <p>As a Victorian LNSP, SP AusNet does not have experience of working with ASPs however it would appear reasonable that this vital role in establishing compliant metering installations in NSW must be covered by a Rules "endorsed" NEMMCO accreditation. This is what is stated in S7.4.5(b) ie there is a "must" obligation on NEMMCO to establish a ASP accreditation "process". We cannot understand therefore the wording in S 7.4.2(c) which does not consistently reflect this obligation.</p> | <p>Revise wording to</p> <p>NEMMCO may<u>must</u> establish an Accredited Service Provider category of registration of Metering Provider</p> |
| 40 | S 7.4.5 (a) | - | M/H | <p>SP AusNet's understanding is that the use of ASPs is currently restricted to type 6 (and type 5 ?) installations on the basis that metering installation at this level does not require specialist metering knowledge above that expected of a competent and experienced "electrician".</p> <p>The concept of extending the use of ASPs to the installation of more complex and advanced metering installations with large market loads, where the impact of installation "errors" on market settlement is more severe, appears to be an issue.</p> <p>Testing into service of these more advanced installations with remote communications requires a high level of co-</p> | <p>Remove meter types 1, 2, 3 and 4 <u>large</u> from the list of installations which can be handled by ASPs.</p> |

| SP AusNet Item No | Clause | Previous Submission Item No | Impact L/M/H | Issue/concern | Suggested Wording |
|-------------------|-------------------------|-----------------------------|--------------|---|---|
| | | | | <p>ordination with the meter data service provider which is unlikely to be obtained from "external" provider.</p> <p>The concept however would appear to be extendable to type 4 small meters which will become the new mass meter.</p> | |
| 41 | S 7.4.5 (c)(2) | - | L | <p>SP AusNet is concerned that this clause appears to support jurisdictional variations between the competencies of ASPs.</p> <p>It would appear inconsistent with the drive to national consistency epitomised by the metrology harmonisation project to allow variation of a Metering Provider registration category.</p> | Remove clause re variations. |
| 42 | Glossary and 7.11.1 (a) | 25 | M | <p>SP AusNet consider that clause 7.11.1 (a) refers only to interval capable metering installations. However our assessment is that the only specific reference to this, and hence the only exclusion of metering installations remotely delivering accumulated metering data, is within the Glossary definition of <i>remote acquisition</i>. However this fact is not prominent or clear within the definition.</p> <p>SP AusNet recommend that the glossary definition be reworded to remove the issue identified above.</p> | <p>remote acquisition: The acquisition of <u>interval metering data</u> from a <i>metering installation</i>, where the acquisition process is designed to transmit the <i>metering data</i> from the site of the <i>metering point</i> to the <i>metering database</i>, and does not, at any time, require the presence of a person at, or near, the <u>interval meter</u> 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). <u>Remote acquisition</u>, and includes but is not limited to <u>methods</u> an interval meter that transmits <i>metering data</i> via:</p> <ol style="list-style-type: none"> (1) direct dial-up; (2) satellite; (3) the internet; (4) a general packet radio service; (5) power line carrier; or (6) any other equivalent technology |

| SP AusNet Item No | Clause | Previous Submission Item No | Impact L/M/H | Issue/concern | Suggested Wording |
|-------------------|-----------|-----------------------------|--------------|---|---|
| 43 | 11.6.1(e) | Part of Section 2 | H | <p>The use of type 4 small meters will not have a full metrology basis until the matters outlined in 7.14.1(c) (and in particular 7.14.1 (c)(4)), and Metering Provider registration requirements as required by clause S7.4.2, are in place. To establish these details the Metrology Procedure and the Metering Provider accreditation documentation (the Service Level Rules (SLR) etc) must be revised to incorporate type 4 small meters. Until then the Rules clauses which establish the new type 4 small meters do not the required metrology "technical" details to support them.</p> <p>SP AusNet therefore cannot understand the content of 11.6.1(c)(4):</p> <ul style="list-style-type: none"> In its first part, which states: "the initial Metrology Procedure is not required to incorporate the matters referred to in rule 7.14.1(c)(4) until 30 June 2008" it appears to give NEMMCO until 30 June 2008 to develop the necessary Metrology Procedure revisions which presumably puts the installation of any type 4 small meters on hold until that date however in its second part, which states: "and NEMMCO may develop a separate procedure for these matters until 30 June 2008", it appears to give NEMMCO the choice of developing another document sometime before mid 2008 to detail type 4 small metrology. <p>If the AEMC expects that type 4 small meters are to be "operational" before mid 2008 then SP AusNet would</p> | <p>SP AusNet suggest the following wording:</p> <p>(e) NEMMCO must ensure that the Metrology Procedure incorporates the matters referred to in rule 7.14.1(c)(4) by ??????? [date determined between NEMMCO and AEMC with industry consultation].</p> <p>(f) NEMMCO must ensure that accreditation and registration categories as required by clause S7.4.2(b) (and associated service level requirements revisions) are in place for meter installations as defined in clause 7.11.1(c) by ??????? [date determined between NEMMCO and AEMC with industry consultation].</p> |

| SP AusNet Item No | Clause | Previous Submission Item No | Impact L/M/H | Issue/concern | Suggested Wording |
|-------------------|--------|-----------------------------|--------------|---|-------------------|
| | | | | <p>expect a “must” obligation to be placed on NEMMCO for the production of the necessary metrology document. We also cannot understand why a “separate procedure” would be able to be produced by NEMMCO any faster than a revision of the Metrology Procedure as it would require Rules consultation.</p> <p>Further if type 4 small meters are to be “operational” at a particular date then NEMMCO must produce the necessary accreditation documentation and SLR changes.</p> <p>Note similar requirements exist for changes to the CATS Procedures</p> | |

Appendix A

SP AusNet issues and suggested wording re
Clauses 7.2.3 (d) – (h) re establishing relationship for type 5 or 6 metering installation

| Clause | AEMC Drafting | AEMC Drafting “interpretation” | Closest equivalent B2B Process step | B2B Process step “interpretation” | Suggested Wording |
|--------|--|--|--|--|---|
| (d) | A <i>Market Participant</i> must request an offer from the <i>Local Network Service Provider</i> to act as the <i>responsible person</i> where a type 5, 6 or 7 <i>metering installation</i> is, or is to be installed. | Retailer must request an offer from the LNSP | Retailer submits a B2B Service Order for connection and meter installation. | The Retailer accepting the “standing offer” of the LNSP for the work requested. | A <i>Market Participant</i> must request the Local Network Service Provider to act as the <i>responsible person</i> where a type 5, 6 or 7 <i>metering installation</i> is, or is to be installed. In making this request the Market Participant deems acceptance of the Local Network Service Provider’s published terms and conditions for the service. |
| (e) | The <i>Local Network Service Provider</i> must, within 15 <i>business days</i> of receipt of the request under paragraph (d), make an offer to a <i>Market Participant</i> setting out the terms and conditions on which it will agree to act as the <i>responsible person</i> . | LNSP must make an offer | LNSP acknowledges work request (indicates reasonable endeavours will be taken to carry out the work) or rejects work for one of a number of defined reasons. | LNSP indicates to retailer that work will be carried out for the applicable “standard fee” | The <i>Local Network Service Provider</i> must, within timeframe defined in the B2B Procedures, acknowledge the Market Participant request. In doing so the Local Network Service Provider deems that the published terms and conditions for the service apply. Presumably <i>B2B Procedures</i> |

| Clause | AEMC Drafting | AEMC Drafting "interpretation" | Closest equivalent B2B Process step | B2B Process step "interpretation" | Suggested Wording |
|--------|---|---|--|-----------------------------------|--|
| | | | | | would need to be a defined term. |
| (f) | <p>The terms and conditions of an offer made under paragraph (d) must:</p> <p>(1) be fair and reasonable; and</p> <p>(2) not unreasonably discriminate, or have the effect of discriminating unreasonably, between <i>Market Participants</i>, or between the customers of any <i>Market Participant</i>.</p> | The LNSP's terms and conditions must be fair and reasonable | LNSP's terms and conditions are determined by their access arrangements and approved by the economic regulator | - | <p>Leave wording as is, or make reference to the access arrangements process</p> <p>ie</p> <p><u>The Local Network Service Provider's published terms and conditions for the service must be determined by their access arrangements and approved by the economic regulator</u></p> |
| (g) | <p>A <i>Market Participant</i> may, in relation to the offer made under paragraph (e):</p> <p>(1) accept the offer; or</p> <p>(2) dispute the offer in accordance with rule 8.2.</p> | Retailer accepts or rejects offer | No directly equivalent step; the Retailer can only dispute the Product Code included in the service order response and Network Bill provided after the event on the basis that it is not consistent with the work requested. | NA | <p><u>If the charge for the service carried out to establish the metering installation is inconsistent with the actual service, or inconsistent with the Local Network Service Provider's published terms and conditions for the service the Market Participant may dispute the charge in accordance with rule 8.2.</u></p> <p>(or should this be <u>.....in accordance with the appropriate jurisdictional B2B procedure</u>)</p> |

| Clause | AEMC Drafting | AEMC Drafting "interpretation" | Closest equivalent B2B Process step | B2B Process step "interpretation" | Suggested Wording |
|--------|---|--|--|-----------------------------------|--|
| (h) | <p>If a <i>Market Participant</i> accepts the offer under paragraphs (c) or (e), the <i>Local Network Service Provider</i>:</p> <p>(1) becomes the <i>responsible person</i>; and</p> <p>(2) must provide <i>NEMMCO</i> with the <i>NMI</i> for the <i>metering installation</i> within 10 business days of entry into a connection agreement under rule 5.3.7 with that <i>Market Participant</i>.</p> | <p>If a Retailer accepts the offer the LNSP becomes the RP</p> <p>Refer SP AusNet's separate comments on (h) (2)</p> | <p>The LNSP submits a Change Request to NEMMCO's MSATS system as per the CATS Procedures establishing the NMI with the LNSP nominated as the RP.</p> | - | <p><u>The Local Network Service Provider's in establishing the NMI under clause 7.2.3(ab)</u> [SP AusNet Proposed new clause Refer Item 6] <u>must nominate themselves as the responsible person</u></p> |

Appendix B

SP AusNet issues and suggested wording re Meter upgrade and meter change before transfer

SP AusNet consider that the essential elements of the required *Rules* requirements are:

1. *FRMP* (ie the retailer currently nominated in MSATS) can arrange for changes including "upgrade" from type 5,6,7 to type 1-4, unless prevented by Jurisdictional policy
2. *Pending FRMP* (ie the Retailer with an arrangement with the customer but not yet recognised in MSATS) ¹ cannot arrange for changes including "upgrade" from type 5,6,7 to type 1-4 (ie must wait for transfer) unless MSATS Procedures specify arrangements
3. Notice must be provided by *FRMP* or *pending FRMP* to current RP (unless of course *FRMP* is current RP)

SP AusNet analysis of the Draft Rules clauses is:

- 7.3.4 (e) states the *FRMP* may arrange change to the meter from type 5,6,7 to remote acquisition (ie type 1-4) however clause is specifically limited to the *FRMP* not the *pending FRMP*. Further this clause does not cover type 1-4 to type 1-4

ie partially covers #1 above but not #2

Refer also to SP AusNet's comments on the definition of *remote acquisition*

- 7.3.4 (h) states that a type 5,6,7 meter cannot be altered by a *pending FRMP* ie before the transfer when the Retailer would become the *FRMP* in MSATS. Further this clause does not cover change of type 1-4 to type 1-4 before transfer.

ie disallows #2 above

- 7.3.4 (i) states that *FRMP* must give notice to RP (except where *FRMP* is RP). Again clause is specifically limited to the *FRMP* not the *pending FRMP*. By referencing 7.3.4 (e) it also does not apply to type 1-4 to type 1-4

ie partially covers #3 above

¹ Note: the *Rules* definition of "*financially responsible*" as used in the term *FRMP* is a little uncertain:

In relation to any *market connection point*, a term which is used to describe the *Market Participant* which has either:

1. classified the *connection point* as one of its *market loads*;

.....

When does "classified" occur?

In general usage within the industry and within industry documentation (eg the B2B Procedures) the *FRMP* is not in place until the transfer in MSATS is complete; SP AusNet hence consider that the term "*pending FRMP*" should be included in the *Rules* definitions and used as appropriate:

pending FRMP a Market Participant that has established an arrangement with the Customer but for which the Market Participant has not been registered in MSATS as the *FRMP*

- 7.2.5 (e) states that the “incoming responsible person” may either be responsible for a metering installation:
- from the FRMP actual change date, or
 - on any other day

This clause provides some flexibility for process and MSATS Procedure change to possibly move the date of RP change for a meter change before transfer from the FRMP actual change date, to the meter change date. This would overcome some of the issues with “misalignment” of the MSATS nominated RP with the actual change of Metering Provider as identified in Appendix A Section (i) below.

Refer SP AusNet comments on clause 7.2.5 (e) in Item 14 above.

We therefore consider that these current clauses need to be reworded to overcome the issues identified above.

SP AusNet suggested rewording:

- 7.3.4 (e) Subject to the metrology procedure and this clause 7.3.4, a *financially responsible Market Participant*, or *pending financially responsible Market Participant* if allowed under clause (h), may make arrangements to alter any type 5, 6 or 7 *metering installation* to make the installation capable of *remote acquisition* or replace a type 1-4 metering installation with a different type 1-4 metering installation.

Refer also to SP AusNet’s suggested re-wording of the definition of *remote acquisition* to ensure that the term clearly includes interval meter.

- 7.3.4 (h) A *metering installation* must not be altered under paragraph (e) until the transfer of the relevant market load has been effected by NEMMCO in accordance with the Market Settlement and Transfer Solution Procedures unless the Market Settlement and Transfer Solution Procedures specify arrangements for the alteration of the metering installation to be carried out on a date different to the market load transfer date.

This aligns with clause 7.2.5(e) which allows MSATS Procedures to specify a different RP change date.

- 7.3.4 (i) A *financially responsible Market Participant*, or pending financially responsible Market Participant who is not the responsible person for a *metering installation* that is to be altered under paragraph (e), must advise the responsible person of the proposed date of alteration at such a time that:

- (1) is prior to that alteration being made; and
- (2) is in accordance with any time specified in the *Market Settlement and Transfer Solution Procedures*.

SP AusNet would expect that the MSATS arrangements noted in clause 7.3.4(i) will provide definition of “prior” and that this time period would allow for RP action to verify that details of the specific arrangements in MSATS Procedure in 7.3.4(h) are being met in a satisfactory manner.

SP AusNet have some further concerns with the concept of meter change before transfer as allowed would be allowed under SP AusNet proposed revised clause 7.3.4 (h). Whilst the MSATS Procedures are an appropriate location for the detailed “arrangements” to apply in this scenario (better than the only current definition of the arrangements, which is within a document reference by the Meter Data

Providers Service Level Requirements), SP AusNet consider that there are two aspects of the process which should be defined in the *Rules* as they impact fundamental responsibilities:

(i) **RP role during meter churn period**

The key requirement for the Rules with respect to RP change is for the Rules to recognise that under some circumstances the *Market Settlements and Transfer Solution Procedures* may establish scenarios where:

- the RP may not have an agreement in place with the *Metering Provider* as identified in MSATS. ie will be in breach of clause 7.2.5, and/or
- the RP as identified in MSATS may not be the FRMP as identified in MSATS (nor the LNSP) ie will be in breach of clauses 7.2.1, 7.2.2 and 7.2.3 in that neither the FRMP as recognised in MSATS nor the LNSP will be the RP

The first dot point is the current scenario where a meter is removed before the retailer transfer date; the second dot point is the scenario under a change to the *Market Settlements and Transfer Solution Procedures* currently under consideration by NEMMCO and industry.

SP AusNet consider that the concept of the RP is fundamental to maintaining metering and market date integrity and hence we consider that the situation of the RP during meter change before transfer must be clearly established.

The Rules words regarding meter change before transfer should be:

- For the current situation where the RP does not change before transfer:

Where a FRMP or pending FRMP has arranged to replace a meter before the actual transfer date as per clause 7.3.4(h), then the current RP as then nominated in MSATS will be exempt from having an agreement in place with a Metering Provider and will be exempt from the various clauses of the Rules which the RP cannot meet unless it has such an agreement with a Metering Provider

- For the situation if the change to the *Market Settlements and Transfer Solution Procedures* currently under consideration by NEMMCO and industry is implemented:

Where a FRMP or pending FRMP has arranged to replace a meter before the actual transfer date as per clause 7.3.4(h), then the RP which the FRMP or pending FRMP has nominated for the replacement metering installation will assume the role of RP from the meter replacement date. All the RP responsibilities and roles detailed in the Rules shall become the responsibilities and roles of this nominated RP and the metering provider(s) with which they have an arrangement as of the date of the meter replacement.

(ii) **Failed transfer following meter churn**

Following a meter change before transfer, if the transfer fails and the meter installation remains with the current FRMP, the RP for the current FRMP will have to recover the metering installation. However this RP and their *metering provider(s)* will no longer have access to, or knowledge of, the metering installation as stated above. Hence the *Rules* should detail a fundamental obligation for the *pending FRMP* and their nominated RP to return the metering installation to a condition which enables the current RP to regain their ability to fulfil their *Rules* obligations.

SP AusNet suggest a clause similar to that below be added to the *Rules*; possibly as 7.3.4(hh):

Where a *FRMP* or *pending FRMP* has replaced a meter before the actual transfer date as per clause 7.3.4(h), [as modified by SP AusNet] and the transfer has subsequently failed, the *pending FRMP* must ensure that the metering installation is left in a condition which the *FRMP* and their MP and their metering service providers agree enables them to carry out all the RP responsibilities and roles detailed in the *Rules*.