

A few
words.

30 June 2015

Mr Richard Owens
Australian Energy Market Commission
PO Box A2449
Sydney South NSW1235

Lodged via email: richard.owens@aemc.gov.au

Ref: ERC0169/RRC0002

Dear Mr Owens,

RE: Expanding Competition in Metering and Related Services: Outstanding Policy and Drafting issues

AGL Energy Ltd (**AGL**) welcomes the opportunity to provide comments to the Australian Energy Market Commission (**AEMC**) on the revised National Electricity Rules (NER) and National Energy Retail Rules (NERR) (together referred to as "**the Rules**") with respect to the Draft Rule Determination on Expanding Competition in Metering and Related Services (the **Draft Rule**).

We consider this Draft Rule fundamental to enabling metering competition in the National Electricity Market (NEM), such that the regulatory framework developed as a result will continue to support greater access to new technologies and customer choice now and into the future.

Overall, we found the drafting changes across the Rules to be generally reflective of the Draft Rule. We applaud the AEMC's efforts in this regard. As a result, the majority of our proposed changes seek to either make the policy intent clearer (where necessary and in line with our understanding of the Draft Rule), correct language, grammar or clause cross-referencing, and highlight minor technicalities or policy gaps. A copy of AGL's proposed changes is set out in Appendix A.

Key to the Draft Rule and therefore the Rules is the role, responsibility and interactions of the Metering Coordinator (MC). In our view, references to this newly created role does not accurately reflect the policy intent set out in the Draft Rule. The revised draft Rules seem to confuse the responsibilities/obligations of the outgoing monopoly Responsible Person (RP) role with the incoming contestable MC role, such that some responsibilities assigned to the MC in the draft Rules should more appropriately sit with other party such as the Metering Provider (MP) or Metering Data Provider (MDP).

We therefore wish to confirm that our understanding of the MC role, accurately reflects the AEMC's policy intent. Specifically that:

- for each connection point, the:



- financially responsible Market Participant (FRMP) must appoint the MC (except in the case of large customers or generators);
- MC will assume all existing responsibilities and obligations of the RP, in addition to the new “gatekeeper” function;
- MC is responsible for the appointment of a service provider (i.e. an MP and MDP) who must:
 - provide, install and maintain the metering installation; and
 - collect, process, retain and deliver metering data for market settlement; and
- gatekeeper function includes managing access to, and the security of, the:
 - metering installation (including energy data);
 - metering data services database; and
 - supply services provided by the metering installation.

Summing up our understanding, the MC provides a negotiations, coordination and contracts management function only. It therefore will not undertake or participate in service transactions – which is the responsibility of the appointed MP and MDP – but does assume overall responsibility for the at the connection point. AGL would appreciate if the AEMC could confirm if our view is correct, or further clarify its intent, where different.

AGL also notes that there are several outstanding unresolved policy and drafting issues with respect to the Draft Rule. As a result, the Rules currently do not reflect the full set of AEMC proposed changes, particular with respect to the procedural rules¹.

Outstanding issues include:

- *the concept and operation of “network devices” for network operations and management purposes;*
- *development of the distribution business ring-fencing guidelines;*
- *interactions of the Draft Rule and the procedural rules effected in Chapter 7 of the NER, particularly the degree of detail directed to the procedures; and*
- *interactions of the Draft Rule and other Power of Choice rule changes under consideration, including with respect to Meter Replacement Processes, Embedded Networks and the Shared Market Protocol/Platform.*

AGL holds serious concern that any delays to the implementation timeline as a result of these outstanding issues will heavily impact on a market-led approach to enabling smart services and its benefits.

Should you have any questions in relation to this submission or our drafting suggestions, please contact Dan Mascarenhas on (03) 8633 7874 or DMascare@agl.com.au.

Yours sincerely,



Stephanie Bashir
Manager, Metering Policy and Development

¹ which rely on the finalisation of this Draft Rule and other related Power of Choice reforms.

AEMC Proposed Changes to NER and NERR (re: Metering Competition Rule):
AGL Drafting Changes & Comments

General comment: The AEMC must confirm the intended functions and responsibilities of the Metering Coordinator role. From the drafting it is not clear the scope of the role, and in several sections it appears that the Metering Coordinator has been provided with additional responsibilities which were never intended (and should sit with the service providers it appoints or the FRMP).

AGL suggest the AEMC do a walkthrough of every instance in the NER and NERR where the Metering Coordinator is referenced and confirm their intent.

Red = Change proposed by AEMC

Green = Additional change suggested by AGL

Yellow highlight = AGL comment or question

Change No	Proposed Text	Proposed with AGL tracks	Comment
1	N/A	<p>Clause 2.4A.1: Metering Coordinator – Registration</p> <p>(a) A Metering Coordinator is a person so accredited and registered with AEMO who is appointed by a financially responsible Market Participant or a large customer to engage in the access to, and coordination and provision of, metering services at a connection point;</p> <p>(c) AEMO must not register a Market Customer as a Metering Coordinator.</p>	<p>(a) The definition does not seem to full capture the role and responsibilities of the MC, nor does it capture the inherited liabilities from DBs. Suggest new text may be necessary to cover off on these points (if not covered off elsewhere).</p> <p>(c) The retailer obligation to set up a separate legal entity should equally apply to all parties selling energy to end users, including those holding retail authorisations and exemptions from registering as a retailer.</p>
2	N/A	<p>Clause 2.4A.2: Metering Coordinator – Eligibility</p> <p>To be eligible for registration as a Metering Coordinator, a person must:</p> <p>(a) Not be a Market Customer</p>	As above in Change No 1(c).
3	<p>Clause 6.17.2: Distribution Ring Fencing Guidelines</p> <p>(a) Guidelines may be developed by the AER for the accounting and functional separation of the provision of direct control services by Distribution Network Service Providers from the provision of other services by Distribution Network Service Providers (the Distribution Ring-Fencing Guidelines). The guidelines may vary in application as between different participating jurisdictions.</p>	<p>Clause 6.17.2</p> <p>(a) Guidelines may must be developed by the AER, in consultation with industry, for the accounting and functional separation of the provision of direct control services by Distribution Network Service Providers from the provision of other services by Distribution Network Service Providers (the Distribution Ring-Fencing Guidelines). The guidelines may vary in application as between different participating jurisdictions.</p>	<p>6.17.2 (a) – Remove reference to “The guidelines may vary in application as between different participating jurisdictions”. The DB ring-fencing guidelines must be applied nationally – this aligns with the policy intent of the Draft Determination.</p> <p>Add “in consultation with industry” as these guidelines must be developed by the AER based on industry consultation. Specifying this makes it clear to the AER how they should develop the document.</p>

	<p>(b) The Distribution Ring-Fencing Guidelines may include, but are not limited to:</p> <p>(1) provisions defining the need for and extent of:</p> <ul style="list-style-type: none"> (i) legal separation of the entity through which a Distribution Network Service Provider provides network services from any other entity through which it conducts business; and (ii) the establishment and maintenance of consolidated and separate accounts for standard control services, alternative control services and other services provided by the Distribution Network Service Provider; and (iii) allocation of costs between standard control services, alternative control services and other services provided by the Distribution Network Service Provider; and (iv) limitations on the flow of information between the Distribution Network Service Provider and any other person; and (v) limitations on the flow of information where there is the potential for a competitive disadvantage between those parts of the Distribution Network Service Provider's business which provide direct control services and parts of the provider's business which provide any other services; and <p>(2) provisions allowing the AER to add to or to waive a Distribution Network Service Provider's obligations under the Distribution Ring-Fencing Guidelines.</p> <p>(c) In developing or amending the Distribution Ring-Fencing Guidelines the AER must consider, without limitation, the need, so far as practicable, for consistency between the Distribution Ring-Fencing Guidelines and the Transmission Ring-Fencing Guidelines.</p> <p>(d) In developing or amending the Distribution Ring-Fencing Guidelines, the AER must consult with participating jurisdictions, Registered Participants, AEMO and other</p>	<p>(b) The Distribution Ring-Fencing Guidelines may must include, but are not limited to:</p> <p>(1) provisions defining the need for and extent of:</p> <ul style="list-style-type: none"> (i) legal and physical separation of the entity through which a Distribution Network Service Provider provides network services from any other entity through which it conducts business; and (ii) the establishment and maintenance of consolidated and separate accounts for standard control services, alternative control services and other services provided by the Distribution Network Service Provider; and (iii) allocation of costs between standard control services, alternative control services and other services provided by the Distribution Network Service Provider; and (iv) limitations on the flow of information between the Distribution Network Service Provider and any other person; and (v) limitations on the flow of information where there is the potential for a competitive disadvantage between those parts of the Distribution Network Service Provider's business which provide direct control services and parts of the provider's business which provide any other services; and <p>(2) provisions allowing the AER to add to or to waive a Distribution Network Service Provider's obligations under the Distribution Ring-Fencing Guidelines.</p> <p>(c) In developing or amending the Distribution Ring-Fencing Guidelines the AER must consider, without limitation, the need, so far as practicable, for consistency between the Distribution Ring-Fencing Guidelines and the Transmission Ring-Fencing Guidelines.</p> <p>(d) In developing or amending the Distribution Ring-Fencing Guidelines, the AER must consult with participating jurisdictions, Registered Participants, AEMO and other</p>	<p>6.17.2 (b) – Omit “may” and substitute for “must”.</p> <p>6. 17.2 (b)(1)(i) – Add “ and physical” between the words “legal separation”.</p> <p>6.17.2 (b)(2) – Under what circumstances would the AER have the ability to waive DB ring-fencing guideline obligations?? This point has not been included in previous policy development</p>
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	interested parties, and such consultation must be otherwise in accordance with the distribution consultation procedures.	interested parties, and such consultation must be otherwise in accordance with the distribution consultation procedures.	
4	<p>Clause 9.9C.2: Expiry Date</p> <p>This clause 9.9C expires on the earlier of:</p> <p>(a) the commencement in Victoria of:</p> <p>(1) a framework for the competition in metering and related services for residential and small business customers under the Rules; and</p> <p>(2) regulatory arrangements that provide for an orderly transfer of the regulation of relevant metering installations under this clause 9.9C to the regulation of metering installations under the Rules; and</p> <p>(b) 31 December 2016.</p>	<p>Clause 9.9C.2:</p> <p>This clause 9.9C expires on the earlier of:</p> <p>(a) the commencement in Victoria of:</p> <p>(1) a framework for the competition in metering and related services for residential and small business customers under the Rules; and</p> <p>(2) regulatory arrangements that provide for an orderly transfer of the regulation of relevant metering installations under this clause 9.9C to the regulation of metering installations under the Rules; and</p> <p>(b) 31 December 2016, [1 July 2017].</p>	<p>The new connections (greenfield sites) market in Victoria should be open to competition immediately post the AEMC's final determination. It is not covered by the Victorian AMI scheme or the Victorian Order in Council and therefore there is no risk to existing Victorian DB smart meters.</p> <p>Also clause (a) must be strengthened such that no further extension to the proposed expiry date is possible.</p>
5	<p>Clause 5.3.7: Finalisation of Connection Agreements</p> <p>(g) Within 20 business days of execution of the connection agreement, the Network Service Provider responsible for the connection point and the Registered Participant must jointly notify AEMO that a connection agreement has been entered into between them and forward to AEMO relevant technical details of the proposed plant and connection, including as applicable:</p> <p>(1) details of all performance standards that form part of the terms and conditions of the connection agreement;</p> <p>(2) if a Generator, the arrangements for:</p> <p>(i) updating the releasable user guide and other information required under clause S5.2.4(b); and</p> <p>(ii) informing AEMO when the connection agreement expires or is terminated;</p> <p>(3) the proposed metering installation;</p> <p>(4) arrangements to obtain physical access to the metering installation for the Metering Provider and the Metering Data Provider for metering installations type 5 and 6; and</p> <p>(5) the terms upon which a Registered Participant is to supply any ancillary services under the connection agreement.</p>	<p>Clause 5.3.7</p> <p>(g) Within 20 business days of execution of the connection agreement, the Network Service Provider responsible for the connection point and the Registered Participant must jointly notify AEMO that a connection agreement has been entered into between them and forward to AEMO relevant technical details of the proposed plant and connection, including as applicable:</p> <p>(1) details of all performance standards that form part of the terms and conditions of the connection agreement;</p> <p>(2) if a Generator, the arrangements for:</p> <p>(i) updating the releasable user guide and other information required under clause S5.2.4(b); and</p> <p>(ii) informing AEMO when the connection agreement expires or is terminated;</p> <p>(3) the proposed metering installation;</p> <p>(4) arrangements to obtain physical access to the metering installation for the Metering Provider and the Metering Data Provider for metering installations type 4A, 4B, 5 and 6; and</p> <p>(5) the terms upon which a Registered Participant is to supply any ancillary services under the connection agreement.</p>	<p>(g) The AEMC has inserted "Type 4A" to denote Type 4 with MSS that has an AEMO exemption applied, however AGL also considers that a new category type for existing Type 4 metering systems installed prior to the commencement of the rule (i.e. Type 4B or Type 8 etc.) should also be introduced to clearly delineate between the various categories (and therefore capability requirements) of Type 4 metering installations.</p> <p>If this is not introduced, it will be problematic from a compliance monitoring and enforcement perspective, and also for retailers to ascertain the capabilities of the meter (when a site is won), and therefore the products and services that may be offered to customers at the site.</p> <p>Therefore the proposed text from the rule commencement should refer to the following:</p> <p>Type 4 = new type 4 with MSS Type 4A = type 4 with MSS, but with telecoms exemption Type 4B = existing type 4 (with no MSS requirement)</p> <p>No suggested change to (h).</p>

	<p>Note This clause is classified as a civil penalty provision under the National Electricity (South Australia) Regulations. (See clause 6(1) and Schedule 1 of the National Electricity (South Australia) Regulations.)</p> <p>(h) AEMO must, within 20 business days of receipt of the notice under paragraph (g), advise the relevant Network Service Provider and the Registered Participant of whether the proposed metering installation is acceptable for those metering installations associated with those connection points which are classified as metering installation types 1, 2, 3 and 4 as specified in schedule 7.2.</p>	<p>Note This clause is classified as a civil penalty provision under the National Electricity (South Australia) Regulations. (See clause 6(1) and Schedule 1 of the National Electricity (South Australia) Regulations.)</p> <p>(h) AEMO must, within 20 business days of receipt of the notice under paragraph (g), advise the relevant Network Service Provider and the Registered Participant of whether the proposed metering installation is acceptable for those metering installations associated with those connection points which are classified as metering installation types 1, 2, 3 and 4 as specified in schedule 7.2 schedule 7.4.</p>	
6	<p>Schedule 5.6: Terms and Conditions of Connection Agreements</p> <p>(l) terms and conditions of access to the metering installation for the Metering Provider and access to metering installations type 5 and 6 for the Metering Data Provider.</p>	<p>Schedule 5.6</p> <p>(l) terms and conditions of access to the metering installation for the Metering Provider and access to metering installations type 4A, 4B, 5 and 6 for the Metering Data Provider.</p>	As above in Change No 5.
7	<p>Clause 5A.A1: Definitions</p> <p>“connection service” means either or both of the following:</p> <p>(a) a service relating to a new connection for premises; (b) a service relating to a connection alteration for premises.</p>	<p>Clause 5A.A1</p> <p>“connection service” means either or both of the following:</p> <p>(a) a service relating to a new connection for premises; (b) a service relating to a connection alteration for premises.</p> <p>But, to avoid doubt, does not include a service of providing, installing or maintaining a metering installation for premises.</p>	No comments.
8	<p>Clause 5A.B.2: Proposed model standing offer for basic connection services</p> <p>(a) A Distribution Network Service Provider must submit for the AER’s approval a proposed model standing offer to provide basic connection services for each class (or subclass) of basic connection services on specified terms and conditions.</p> <p>(b) The terms and conditions of the proposed model standing offer must cover:</p> <p>(1) a description of the connection (and the premises connection assets of which it is to be comprised) including a statement of its maximum capacity; and</p> <p>(2) timeframes for commencing and completing the work; and</p> <p>(3) the qualifications required for carrying out the work involved in providing a contestable service (including reference to the jurisdictional or other legislation and</p>	<p>Clause 5A.B.2: Proposed model standing offer for basic connection services</p> <p>(a) A Distribution Network Service Provider must submit for the AER’s approval a proposed model standing offer to provide basic connection services for each class (or subclass) of basic connection services on specified terms and conditions.</p> <p>(b) The terms and conditions of the proposed model standing offer must cover:</p> <p>(1) a description of the connection (and the premises connection assets of which it is to be comprised) including a statement of its maximum capacity; and</p> <p>(2) timeframes for commencing and completing the work; and</p> <p>(3) the qualifications required for carrying out the work involved in providing a contestable service (including reference to the jurisdictional or other legislation and</p>	No comments.

	<p>statutory instruments under which the qualifications are required); and</p> <p>(4) the safety and technical requirements (including reference to the jurisdictional or other legislation and statutory instruments under which the requirements are imposed) to be complied with by the provider of a contestable service or the retail customer (or both); and</p> <p>(5) details of the connection charges (or the basis on which they will be calculated) including details of the following (so far as applicable):</p> <ul style="list-style-type: none"> (i) the cost of any necessary extension to the distribution system for which provision has not already been made through existing distribution use of system charges or a tariff applicable to the connection; (ii) meter type and cost; (iii) the cost of any other relevant premises connection assets; (iv) the costs of common components of minor variations from the standard specifications; (v) any other incidental costs; and 	<p>statutory instruments under which the qualifications are required); and</p> <p>(4) the safety and technical requirements (including reference to the jurisdictional or other legislation and statutory instruments under which the requirements are imposed) to be complied with by the provider of a contestable service or the retail customer (or both); and</p> <p>(5) details of the connection charges (or the basis on which they will be calculated) including details of the following (so far as applicable):</p> <ul style="list-style-type: none"> (i) the cost of any necessary extension to the distribution system for which provision has not already been made through existing distribution use of system charges or a tariff applicable to the connection; (ii) meter type and cost; (iii) the cost of any other relevant premises connection assets; (iv) the costs of common components of minor variations from the standard specifications; (v) any other incidental costs; and 	
9	<p>Clause 6.20.1: Billing for distribution services</p> <p>(e) Charges for distribution services based on metered kW, kWh, kVA, or kVAh for:</p> <ul style="list-style-type: none"> (1) Embedded Generators that are Market Generators; and (2) Market Customer; and (3) Second-Tier Customers; <p>must be calculated by the Distribution Network Service Provider from:</p> <ul style="list-style-type: none"> (1) settlements ready data obtained from AEMO's metering database, for those Embedded Generators, Market Customers and Second-Tier Customers with connection points that have a type 1, 2, 3 or 4 metering installation; and 	<p>Clause 6.20.1</p> <p>(e) Charges for distribution services based on metered kW, kWh, kVA, or kVAh for:</p> <ul style="list-style-type: none"> (1) Embedded Generators that are Market Generators; and (2) Market Customer; and (3) Second-Tier Customers; <p>must be calculated by the Distribution Network Service Provider from:</p> <ul style="list-style-type: none"> (1) settlements ready data obtained from AEMO's metering database, for those Embedded Generators, Market Customers and Second-Tier Customers with connection points that have a type 1, 2, 3, 4, or 4B, metering installation; and 	<p>Added reference to Type 4B - comments in Change No 5.</p>

	(2) metering data, in accordance with a metrology procedure that allows the Distribution Network Service Provider to use energy data for this purpose, or otherwise settlements ready data obtained from AEMO's metering database, for those Embedded Generators, Market Customers and Second-Tier Customers with connection points that have a type 5, 6 or 7 metering installation	7 (2) metering data, in accordance with a metrology procedure that allows the Distribution Network Service Provider to use energy data for this purpose, or otherwise settlements ready data obtained from AEMO's metering database, for those Embedded Generators, Market Customers and Second-Tier Customers with connection points that have a type 4A 5, 6 or metering installation	
10	Clause 8.2.1: Dispute Resolution – Application and Guiding Principle (h) Rule 8.2 does not apply to: (10) a decision by AEMO under clause 7.1.2(b) to refuse to permit a Market Participant to participate in the market in respect of a connection point; (11) a decision by AEMO whether or not to deregister a Metering Provider or Metering Data Provider under clause 7.4.3(d) or to suspend a Metering Provider or Metering Data Provider from a category of registration under clause 7.4.3(c) or to impose agreed constraints on the continued operation of a Metering Provider or Metering Data Provider;	Clause 8.2.1 (h) Rule 8.2 does not apply to: (10) a decision by AEMO under clause 7.1.2(b) 7.2.1(b) to refuse to permit a Market Participant to participate in the market in respect of a connection point; (11) a decision by AEMO whether or not to deregister a Metering Provider or Metering Data Provider under clause 7.4.3 (d) (e) or to suspend a Metering Provider or Metering Data Provider from a category of registration under clause 7.4.3 (e) (d) or to impose agreed constraints on the continued operation of a Metering Provider or Metering Data Provider;	Changes to correct a typo error referencing an incorrect clause. No other change.
11	N/A	Clause 8.6.1A: Application (Part C – Registered Participants confidentiality obligations) For the purposes of this Part C only, “Registered Participant” is deemed to include not just Registered Participants but also Metering Providers and Metering Data Providers.	No comments.
12	N/A	Chapter 10 New Definitions “Large customer” (a) In a participating jurisdiction where the National Energy Retail Law applies as a law of that participating jurisdiction, has the meaning given in the National Energy Retail Law in each participating jurisdiction. (b) Otherwise, has the meaning given in jurisdictional electricity legislation. “Metering Coordinator” a person who is registered by AEMO as a Metering Coordinator under Chapter 2.	See change to “large customer” definition – current language is circular. No change to “MC” definition assuming changes made under Change No 1.
13	PART B - 7.2.1: Obligations of FRMP to Establish Metering Installations	PART B - 7.2.1	

	<p>(a) Except as otherwise specified in paragraph (c), before participating in the market in respect of a connection point, and for so long as the financially responsible Market Participant continues to participate in the market in respect of a connection point the financially responsible Market Participant must ensure that:</p> <ul style="list-style-type: none"> (1) the connection point has a metering installation and that the metering installation is registered with AEMO; (2) a Metering Coordinator is appointed with respect to the connection point in accordance with clause 7.6.2; and (3) prior to registration, a NMI has been obtained by the Metering Coordinator appointed with respect to the connection point. <p>(b) AEMO may refuse to permit a financially responsible Market Participant to participate in the market in respect of any connection point in relation to which that financially responsible Market Participant is not in compliance with its obligations under paragraph (a).</p>	<p>(a) Except as otherwise specified in paragraph (c), before participating in the market in respect of a connection point, and for so long as the financially responsible Market Participant continues to participate in the market in respect of a connection point the financially responsible Market Participant must ensure that:</p> <ul style="list-style-type: none"> (1) a Metering Coordinator is appointed with respect to the connection point in accordance with clause 7.6.2; (2) the connection point has a metering installation and that the metering installation is registered with AEMO; and (3) prior to registration, a NMI has been obtained by the Metering Coordinator appointed with respect to the connection point. <p>(b) AEMO may refuse to permit a financially responsible Market Participant to participate in the market in respect of any connection point in relation to which that financially responsible Market Participant is not in compliance with its obligations under paragraph (a).</p>	<p>Suggest the AEMC switches (a)(1) and (a)(2) around as this then aligns with the logical steps taken at each connection point.</p> <p>Re (a)(3) a NMI for the connection point under current rules is obtained by the Responsible Person (who for small sites, is the DB), who has been appointed . However given the MC role is contestable, it is not appropriate for the MC to obtain the NMI from a DB for a connection point.</p> <p>Instead, the FRMP must obtain the NMI for a connection point and provide to the RP/MC.</p>
14	<p>Clause 7.3.1: Responsibility of the Metering Coordinator</p> <p>(a) For the term of its appointment in respect of a connection point, the Metering Coordinator is the person responsible for the:</p> <ul style="list-style-type: none"> (1) provision, installation and maintenance of a metering installation; (2) except as otherwise specified in clause 7.5.1(a), collection of metering data with respect to each metering installation for which it is responsible, the processing of that data, retention of metering data in the metering data services database and the delivery of the metering data to the metering database; and (3) managing access to and the security of the metering installation, metering data services database, services provided by the metering installation and energy data held in the metering installation. 	<p>Clause 7.3.1</p> <p>(a) For the term of its appointment in respect of a connection point, the Metering Coordinator is the person responsible for coordination of the:</p> <ul style="list-style-type: none"> (1) provision, installation and maintenance of a metering installation; (2) except as otherwise specified in clause 7.5.1(a), collection of metering data with respect to each metering installation for which it is responsible, the processing of that data, retention of metering data in the metering data services database and the delivery of the metering data to the metering database; and (3) managing access to and the security of the metering installation, metering data services database, services provided by the metering installation and energy data held in the metering installation; and (4) commercial terms associated with access in accordance with paragraph (a)(3), and management of executed agreements with market parties. 	<p>The MC role is a coordination and gatekeeper function – it does not undertake activities for a site directly.</p> <p>Suggested changes link to the coordination role outlined in 2.4A.1 (see Change No 1) and 7.6.1(b) which adds in the management of commercial service level agreements between the MC and various parties seeking access to the metering installation and its services.</p>
15	<p>Clause 7.3.2: Role of Metering Coordinator</p> <p><u>Metering data services</u></p>	<p>Clause 7.3.2</p> <p><u>Metering data services</u></p>	

	<p>(g) Except as specified in clause 7.5.1(a), the Metering Coordinator must, for each metering installation for which it is responsible:</p> <p>(5) arrange for the provision of relevant metering data to the Metering Data Provider if remote acquisition, if any, becomes unavailable.</p> <p>(f) The Metering Coordinator must, for each small customer metering installation for which it is responsible, ensure that energy data is retrieved from that small customer metering installation via remote access.</p> <p><u>Metering data services</u></p> <p>(g) Except as specified in clause 7.5.1(a), the Metering Coordinator must, for each metering installation for which it is responsible:</p> <p>(1) ensure that the Metering Data Provider appointed under paragraph (d) accommodates any special site or technology related conditions determined by AEMO in accordance with clause 7.8.12(c), and where necessary the Metering Coordinator must clarify any matters with AEMO in order to choose a Metering Data Provider for that metering installation that is mutually suitable to all parties;</p> <p>(2) ensure that metering data services are provided in accordance with the Rules and procedures authorised under the Rules;</p> <p>(3) for any type 5 metering installation where the annual flow of electricity through the connection point is greater than the type 5 accumulation boundary, ensure that interval energy data is collected;</p> <p>(4) for any type 4A metering installation, ensure that interval energy data is collected; and</p> <p>(5) arrange for the provision of relevant metering data to the Metering Data Provider if remote acquisition, if any, becomes unavailable.</p> <p><u>Access to small customer metering installation</u></p> <p>(h) The Metering Coordinator must, for each small customer metering installation for which it is responsible:</p> <p>(1) ensure that a service listed in the minimum services specification in column 1 of table S7.5.1.1 is only accessed by an access party;</p>	<p>(g) Except as specified in clause 7.5.1(a), the Metering Coordinator must, for each metering installation for which it is responsible:</p> <p>(5) arrange for the provision of relevant metering data to the Metering Data Provider if remote acquisition, if any, becomes unavailable.</p> <p>(f) The Metering Coordinator must, for each small customer metering installation for which it is responsible, ensure that energy data is retrieved from that small customer metering installation via remote access by the Metering Data Provider appointed under paragraph (d).</p> <p><u>Metering data services</u></p> <p>(g) Except as specified in clause 7.5.1(a), the Metering Coordinator must, for each metering installation for which it is responsible:</p> <p>(1) ensure that the Metering Data Provider appointed under paragraph (d) accommodates any special site or technology related conditions determined by AEMO in accordance with clause 7.8.12(c), and where necessary the Metering Coordinator must clarify any matters with AEMO in order to choose a Metering Data Provider for that metering installation that is mutually suitable to all parties;</p> <p>(2) ensure that metering data services are provided in accordance with the Rules and procedures authorised under the Rules;</p> <p>(3) for any type 5 metering installation where the annual flow of electricity through the connection point is greater than the type 5 accumulation boundary, ensure that interval energy data is collected and allocated to the financially responsible Market Participant;</p> <p>(4) for any type 4A metering installation, ensure that interval energy data is collected and allocated to the financially responsible Market Participant; and</p> <p>(5) arrange for the provision of relevant metering data to the Metering Data Provider if remote acquisition, if any, becomes unavailable.</p> <p><u>Access to small customer metering installation</u></p> <p>(h) The Metering Coordinator must, for each small customer metering installation for which it is responsible:</p> <p>(1) ensure that a service listed in the minimum services specification in column 1 of table S7.5.1.1 is only accessed by an access party;</p>	<p>Fixed typo.</p> <p>New text to cover off on the requirement to meet jurisdictional safety obligations.</p> <p>Suggest adding a new definition for “Jurisdictional Safety Regulator”.</p> <p>Re (g)(5) – The arrangement of meter data where remote acquisition is unavailable is a function of the MDP, not MC.</p>
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	<p>(2) ensure that access to the metering installation, the services provided by the metering installation and energy data held in the metering installation is only granted to persons entitled to access that metering installation, or the services provided by the metering installation or energy data held in the metering installation in accordance with this Chapter 7; and</p> <p>(3) not disconnect or reconnect a metering installation except:</p> <ul style="list-style-type: none"> (i) on the request of the financially responsible Market Participant or Local Network Service Provider; (ii) where such disconnection or reconnection is effected via remote access; and (iii) in accordance with the emergency priority procedures. 	<p>(2) ensure that access to the metering installation, the services provided by the metering installation and energy data held in the metering installation is only granted to persons entitled to access that metering installation, or the services provided by the metering installation or energy data held in the metering installation in accordance with this Chapter 7; and</p> <p>(3) not arrange for the disconnection or reconnection of a metering installation by the appointed Meter Provider except:</p> <ul style="list-style-type: none"> (i) on the request of the financially responsible Market Participant or Local Network Service Provider; (ii) where such disconnection or reconnection is effected via remote access in accordance with paragraph 3(i); and (iii) in accordance with the emergency priority procedures and any additional jurisdictional safety procedures as set by the relevant Jurisdictional Safety Regulator. <p>(i) the Metering Coordinator obligations under paragraph (h) should be reviewed no later than [1 July 2020].</p>	<p>Re: (i) new text to enforce the AEMC’s decision to review the MC’s role in three years with respect to small customers. Date is bracketed in case the rule commencement date is altered.</p>
16	<p>Clause 7.6.1: Commercial nature of the Metering Coordinator appointment and service provision</p> <p>(a) A Metering Coordinator assumes responsibility in respect of a connection point under this Chapter 7 on terms and conditions (including as to price) to be commercially agreed between the Metering Coordinator and the financially responsible Market Participant or large customer who appoints the Metering Coordinator under clause 7.6.2.</p> <p>(b) In accordance with the Rules and procedures authorised under the Rules, a Metering Coordinator may supply services with respect to a metering installation including access to the services provided by the metering installation and metering data from the metering installation on terms and conditions (including as to price) to be commercially agreed between the Metering Coordinator and the requesting party.</p>	<p>Clause 7.6.1:</p> <p>(a) A Metering Coordinator assumes responsibility in respect of a connection point under this Chapter 7 on terms and conditions (including as to price) to be commercially agreed between the Metering Coordinator and the party appointing the financially responsible Market Participant or large customer who appoints the Metering Coordinator under clause 7.6.2.</p> <p>(b) In accordance with the Rules and procedures authorised under the Rules, a Metering Coordinator may supply services with respect to a metering installation for which it has been appointed in accordance with clause 7.6.2, including access to the services provided by the metering installation and metering data from the metering installation on terms and conditions (including as to price) to be commercially agreed between the Metering Coordinator and the requesting party. For the avoidance of doubt, any access granted to metering data from the metering installation must only be provided with the explicit informed consent of the customer.</p>	<p>(a) New text seeks to remove ambiguity where the FRMP and the MC do not have an existing relationship (outside of this commercial agreement. I.e. Where Origin Energy does not appoint Acumen Metering)</p> <p>(b) New text strengthens customer protections.</p>

17	<p>7.6.2 – Appointment by financially responsible Market Participant or large customer</p> <p>(a) A Metering Coordinator may only be appointed with respect to a connection point by:</p> <p>(1) the Market Participant which is financially responsible for the connection point; or</p> <p>(2) the large customer whose premises are supplied at the connection point.</p> <p>(b) A financially responsible Market Participant or large customer making an appointment under paragraph (a) must do so in accordance with the Rules and procedures authorised under the Rules.</p> <p>(c) The Market Settlements and Transfer Solution Procedures may specify that an incoming Metering Coordinator is responsible for the metering installation:</p> <p>(1) on the day that a market load transfers from one financially responsible Market Participant to another financially responsible Market Participant for the period within that day; or</p> <p>(2) on any other day</p>	<p>Clause 7.6.2</p> <p>(a) A Metering Coordinator may only be appointed with respect to a connection point by the following parties:</p> <p>(1) the Market Participant which is financially responsible for the connection point;</p> <p>(2) the large customer whose premises are supplied at the connection point; or</p> <p>3) for a generation connection point:</p> <p>(i) the generator participant;</p> <p>(ii) exempt generator; or</p> <p>(iii) as agreed between the generator participant and parties exempted in relation to the same installation.</p> <p>(b) A party financially responsible Market Participant or large customer making an appointment under paragraph (a) must do so in accordance with the Rules and procedures authorised under the Rules.</p> <p>(c) The Market Settlements and Transfer Solution Procedures may specify that an incoming Metering Coordinator is responsible for the metering installation:</p> <p>(1) on the day that a market load transfers from one financially responsible Market Participant to another financially responsible Market Participant for the period within that day; or</p> <p>(2) on any other day.</p>	<p>Subclause (c) has been amended to reflect AEMO’s amendment to the Meter Churn Procedure which will take effect from 1 September 2015.</p> <p>New text added to cover MC’s at generation sites.</p> <p>Re (c) ERM Power’s Meter Replacement Rule may require changes to this section, where the rule is approved.</p> <p>The AEMC should also clarify how (1) and (2) works when (2) could be interpreted as at any time, therefore overrides any instance of (1).</p>
18	<p>Clause 7.7.1: Obligations of financially responsible Market Participants on Metering Coordinator default event and end of contract.</p> <p>(a) Without limiting the obligations of a financially responsible Market Participant under clause 7.2.1(a)(2), the financially responsible Market Participant must appoint a new Metering Coordinator in respect of a connection point in circumstances where:</p> <p>(1) a Metering Coordinator default event occurs with respect to the existing Metering Coordinator for the connection point; or</p> <p>(2) the contract under which the existing Metering Coordinator is appointed by a large customer in accordance with clause 7.6.2(a)(2) is terminated or expires and the</p>	<p>Clause 7.7.1</p> <p>(a) Without limiting the obligations of a financially responsible Market Participant under clause 7.2.1(a)(2), the financially responsible Market Participant must appoint a new Metering Coordinator in respect of a connection point in circumstances where:</p> <p>(1) a Metering Coordinator default event occurs with respect to the existing Metering Coordinator for the connection point; or</p> <p>(2) the contract under which the existing Metering Coordinator is appointed by a large customer in accordance with clause 7.6.2(a)(2) is terminated or expires and the large customer does not appoint a new Metering Coordinator</p>	<p>(a) Clarity is required on the types of events that would constitute a MC default event under subparagraph (d) of the “Metering Coordinator default event” definition.</p> <p>We suggest that the AEMC makes this clearer.</p>

	<p>large customer does not appoint a new Metering Coordinator within the period specified by AEMO in procedures authorised under the Rules,</p> <p>as soon as practicable after the Metering Coordinator default event occurs or the period referred to in subparagraph (a)(2) has elapsed (as the case may be).</p> <p>(b) If:</p> <p>(1) the financially responsible Market Participant is required to appoint a new Metering Coordinator in respect of a connection point for a large customer in accordance with paragraph (a); and</p> <p>(2) the existing contract between the financially responsible Market Participant and the large customer does not deal with the appointment of a Metering Coordinator in these circumstances, the terms and conditions of the contract between the financially responsible Market Participant and the large customer relating to the appointment of the Metering Coordinator (including as to price) must be fair and reasonable.</p> <p>(c) The contract between a financially responsible Market Participant or a large customer and the Metering Coordinator entered into in accordance with clause 7.6.2(a)(1) or (2), respectively, must include terms to the effect that the appointment of the Metering Coordinator will terminate on the appointment of a new Metering Coordinator following the occurrence of a Metering Coordinator default event in respect of the Metering Coordinator.</p>	<p>within the period specified by AEMO in procedures authorised under the Rules,</p> <p>as soon as practicable after the Metering Coordinator default event occurs or the period referred to in subparagraph (a)(2) has elapsed (as the case may be).</p> <p>(b) If:</p> <p>(1) the financially responsible Market Participant is required to appoint a new Metering Coordinator in respect of a connection point for a large customer in accordance with paragraph (a); and</p> <p>(2) the existing contract between the financially responsible Market Participant and the large customer does not deal with the appointment of a Metering Coordinator in these circumstances, the terms and conditions of the contract between the financially responsible Market Participant and the large customer relating to the appointment of the Metering Coordinator (including as to price) must be fair and reasonable.</p> <p>(c) The contract between a financially responsible Market Participant or a large customer and the Metering Coordinator entered into in accordance with clause 7.6.2(a)(1) or (2), respectively, must include terms to the effect that the appointment of the Metering Coordinator will terminate on the appointment of a new Metering Coordinator following the occurrence of a Metering Coordinator default event in respect of the Metering Coordinator.</p>	
19	<p>Clause 7.8.2: Metering Installation Components</p> <p>(a) A Metering Provider must ensure that a metering installation (other than a type 7 metering installation) must:</p> <p>(1) either contain a device that has a visible or an equivalently accessible display of the cumulative total energy measured by that metering installation (at a minimum);</p> <p>(3) in the case of metering installations types 1, 2, 3, or 4, have electronic data transfer facilities from the metering installation to the metering data services database;</p>	<p>Clause 7.8.2</p> <p>(a) A Metering Provider must ensure that a metering installation (other than a type 7 metering installation) must:</p> <p>(1) either contain a device that has a visible or an equivalently accessible display of the cumulative total energy measured by that metering installation (at a minimum);</p> <p>(2) be accurate in accordance with clause 7.8.8;</p> <p>(3) in the case of metering installations types 1, 2, 3, 4 or 4B, have electronic data transfer facilities from the metering installation to the metering data services database;</p>	<p>As Per Change No 5, suggest AEMC spell out the differences between type 4, 4A and 4B, where:</p> <p>4 = type 4 metering installation with MSS 4A = 4 without comms (based on AEMO exemption) 4B = existing type 4 metering installation prior to metering competition rule commencement.</p>

	<p>(4) include a communications interface to meet the requirements of clause 7.3.2(e)(4);</p> <p>(9) include facilities for storing interval energy data for a period of at least 35 days if the metering installation is registered as a type 1, 2, 3 or 4 metering installation;</p> <p>(10) include facilities for storing interval energy data for a period of at least 200 days or such other period as specified in the metrology procedure if the metering installation is registered as a type 4A or type 5 metering installation; and</p> <p><u>Requirements for metering installations for a small generating unit classified as a market generating unit</u> (g) In addition to the requirements for metering installations for non-market generating units in paragraph (f), a metering installation for a small generating unit classified as a market generating unit must: (1) be a metering installation that is classified as a type 1, 2, 3 or 4 metering installation; and (2) be capable of recording interval energy data relevant to settlements.</p>	<p>(4) include a communications interface to meet the requirements of clause 7.3.2(e)(4);</p> <p>(9) include facilities for storing interval energy data for a period of at least 35 days if the metering installation is registered as a type 1, 2, 3, 4 or 4B metering installation;</p> <p>(10) include facilities for storing interval energy data for a period of at least 200 days or such other period as specified in the metrology procedure if the metering installation is registered as a type 4A or type 5 metering installation;</p> <p><u>Requirements for metering installations for a small generating unit classified as a market generating unit</u> (g) In addition to the requirements for metering installations for non-market generating units in paragraph (f), a metering installation for a small generating unit classified as a market generating unit must: (1) be a metering installation that is classified as a type 1, 2, 3, or 4, 4A or 4B metering installation; and (2) be capable of recording interval energy data relevant to settlements.</p>	
20	<p>Clause 7.8.3: Small customer metering installations</p> <p>(a) Except as specified in clause 7.8.4, a Metering Coordinator must ensure that any new or replacement metering installation in respect of the connection point of a small customer is a type 4 metering installation that meets the minimum services specification.</p> <p>(b) Except where a Metering Coordinator has obtained an exemption under clause 7.8.4 in respect of a connection point, a Metering Provider must ensure that any metering installation installed or proposed to be installed in respect of a new connection for a small customer at that connection point is a type 4 metering installation that meets the minimum services specification.</p>	<p>Clause 7.8.3</p> <p>(a) Except as specified in clause 7.8.4, a Metering Coordinator must ensure that any new or replacement metering installation in respect of the connection point of a small customer is a type 4 metering installation that meets the minimum services specification.</p> <p>(b) Except where a Metering Coordinator has obtained an exemption under clause 7.8.4 in respect of a connection point, a Metering Provider must ensure that any metering installation installed or proposed to be installed in respect of a new connection for a small customer at that connection point is a type 4 metering installation that meets the minimum services specification.</p>	<p>Re (a) Suggest that “new or” is deleted as the structure of the sub-clause seems to refer to replacement connections only, and (b) seems to refer to new connections only. Both are linked to clause 7.8.4 (a).</p> <p>If AGL view is incorrect, we suggest that the AEMC make clear why both (a) and (b) reference “new”.</p> <p>AGL’s understanding is reference to “new” refers to greenfield sites.</p>
21	<p>Clause 7.8.4: Type 4A metering installation</p> <p>(a) AEMO may exempt a Metering Coordinator from complying with clause 7.8.3(a) in respect of a connection point for one or more periods of up to 5 years each if the Metering Coordinator demonstrates to AEMO’s reasonable satisfaction that there is no existing telecommunications network which enables remote access in respect of the metering installation at that connection point.</p> <p>(b) A Metering Coordinator that is exempt from complying with clause 7.8.3(a) in respect of a connection point under paragraph (a) must ensure that any new or replacement metering installation in respect of</p>	<p>Clause 7.8.4</p> <p>(a) AEMO may exempt a Metering Coordinator from complying with clause 7.8.3(a) or (b) in respect of a connection point for one or more periods of up to 5 years each if the Metering Coordinator demonstrates to AEMO’s reasonable satisfaction that there is no existing telecommunications network which enables remote access in respect of the metering installation at that connection point.</p> <p>(b) A Metering Coordinator that is exempt from complying with clause 7.8.3(a) or (b) in respect of a connection point under paragraph 7.8.4(a) must ensure that any new or replacement metering installation in</p>	<p>Added in reference to (b) to account for new and replacement metering installations which are covered by AGL’s suggested change to clause 7.8.3 - See Change 20 above.</p>

	<p>that connection point including, for the avoidance of doubt, a metering installation at a new connection is a type 4A metering installation that has the capability of providing the services in table S7.5.1.1.</p> <p>(c) On and from an exemption under paragraph (a) ceasing to apply in respect of a connection point, the Metering Coordinator must ensure that the metering installation at that connection point is a type 4 metering installation that meets the minimum services specification.</p>	<p>respect of that connection point including, for the avoidance of doubt, a metering installation at a new connection is a type 4A metering installation that has the capability of providing the services in table S7.5.1.1.</p> <p>(c) On and from the date an exemption under paragraph (a) ceasing to apply in respect of a connection point, the Metering Coordinator must ensure that the metering installation at that connection point is a type 4 metering installation that meets the minimum services specification.</p>	<p>Re (c): Added reference to “the date” to strengthen the text around when an exemption is enforced.</p>
22	<p>7.8.6: Network devices</p> <p>(a) A Local Network Service Provider may install a network device at or adjacent to a metering installation for the purposes of monitoring or operating its network.</p> <p>(b) A Metering Coordinator:</p> <p>(1) must cooperate with a Local Network Service Provider who wishes to install a network device under paragraph (a) and provide all reasonable assistance to facilitate the installation of the network device at or adjacent to the metering installation; and</p> <p>(2) must not remove, damage or render inoperable a network device that has been installed at or adjacent to a metering installation except with the consent of the Local Network Service Provider.</p> <p>(c) A Local Network Service Provider must not:</p> <p>(1) use a network device except in connection with the operation or monitoring of its network;</p> <p>(2) without limiting subparagraph (1), use a network device to reconnect or disconnect a metering installation via remote access;</p> <p>(3) remove, damage or render inoperable a metering installation; or</p> <p>(4) disclose any information obtained from a network device to any person except as permitted in the Rules.</p> <p>(d) Information obtained from a network device is confidential and must be treated as confidential information in accordance with the Rules.</p>	<p>7.8.6</p> <p>(a) A Local Network Service Provider may install a network device at or adjacent to a metering installation for the purposes of monitoring or operating its network where it can demonstrate:</p> <p>(1) it has entered into unsuccessful or unresolvable commercial negotiation with the Metering Coordinator/s in respect of a connection point;</p> <p>(2) requires access to supply services in respect of a connection point; and</p> <p>(3) the connection point is located in the jurisdiction of Victoria.</p> <p>(b) Any network device installed in accordance with paragraph (a) must be suitably ring-fenced away from the services provided by the metering installation installed at the site, including, for the avoidance of doubt, any third parties accessing the metering installation.</p> <p>(c) If the Local Network Service Provide meets the requirements in accordance with paragraph 7.8.6(a), the Metering Coordinator with respect to the connection point:</p> <p>(1) must cooperate with a Local Network Service Provider who wishes to install a network device under paragraph (a) and provide all reasonable assistance to facilitate the installation of the network device at or adjacent to the metering installation; and</p> <p>(2) must not remove, damage or render inoperable a network device that has been installed at or adjacent to a metering installation except with the consent of the Local Network Service Provider.</p> <p>(c) A Local Network Service Provider must not:</p>	<p>New text added to support AGL’s submission. Makes clear that network devices should only be installed in Victoria (where there is a risk to meter displacement, and the existing meter has the capability to provide smart meter services), and that it should only be used for network operations.</p> <p>The network device is not a contestable service (i.e. it is a regulated service), therefore it should not be used for load management or the provision of other services to third parties.</p> <p>Network devices must also form part of the AER’s network pricing determination process.</p>

		<p>(1) use a network device except in connection with the operation or monitoring of its network;</p> <p>(2) without limiting subparagraph (1), use a network device to reconnect or disconnect a metering installation via remote access;</p> <p>(3) remove, damage or render inoperable a metering installation; or</p> <p>(4) record or disclose any information obtained from a network device to any person except as permitted in the Rules.</p> <p>(d) Information obtained from a network device is confidential and must be treated as confidential information in accordance with the Rules.</p>	
23	<p>Clause 7.8.9: Meter Churn</p> <p>(a) Any alteration or replacement of a metering installation under this Chapter 7 must be managed in accordance with the meter churn procedures.</p> <p>(b) A Metering Coordinator may alter a type 5 or 6 metering installation in accordance with paragraph (a) to make it capable of remote acquisition where the Metering Coordinator decides that operational difficulties reasonably require the metering installation to be capable of remote acquisition.</p> <p>(c) An alteration of a metering installation by a Metering Coordinator in accordance with paragraph (b) does not alter the classification of that installation to a type 4 or 4A metering installation.</p> <p>(d) For the purposes of paragraph (b), operational difficulties may include locational difficulties where the metering installation is:</p> <p>(1) at a site where access is difficult; or</p> <p>(2) on a remote rural property.</p> <p>(e) A metering installation must not be altered or replaced by the Metering Coordinator under paragraph (a) until the transfer of the relevant market load has been effected by AEMO in accordance with the Market Settlement and Transfer Solution Procedures.</p> <p>(f) AEMO must establish, maintain and publish procedures for the Metering Coordinator, Metering Provider, Metering Data Provider and financially responsible Market Participant to consider in managing the</p>	<p>Clause 7.8.9</p> <p>(a) Any alteration or replacement of a metering installation under this Chapter 7 must be managed in accordance with the meter churn procedures.</p> <p>(b) A Metering Coordinator may alter a type 5 or 6 metering installation in accordance with paragraph (a) to make it capable of remote acquisition where the Metering Coordinator decides that operational difficulties reasonably require the metering installation to be capable of remote acquisition.</p> <p>(c) An alteration of a metering installation by a Metering Coordinator in accordance with paragraph (b) does not alter the classification of that installation to a type 4B or 4A metering installation.</p> <p>(d) For the purposes of paragraph (b), operational difficulties may include locational difficulties where the metering installation is:</p> <p>(1) at a site where access is difficult; or</p> <p>(2) on a remote rural property.</p> <p>(e) A metering installation must not be altered or replaced by the appointed Meter Provider on instruction from the Metering Coordinator under paragraph (a), until the transfer of the relevant market load has been effected by AEMO in accordance with the Market Settlement and Transfer Solution Procedures.</p> <p>(f) AEMO must establish, maintain and publish procedures for the Metering Coordinator, Metering Provider, Metering Data Provider and</p>	<p>Suggest the AEMC confirm the intention of (b) and (c) – what is this trying to achieve and how it would work in practice (i.e. operationally).</p> <p>The sub-clauses seem to be limited to some SME’s and residential customers with existing type 5 or 6 metering installations. However, given the Draft Determination mandates that all new and replacement metering installations be type 4 with MSS, these sub-clauses could only refer to an existing type 5 or 6 being upgraded to an equivalent type 4B but without a change to the classification.</p> <p>In addition, it is technically impossible to upgrade a type 6 accumulation meter to enable remote acquisition. This can only be done with “smart” interval meters.</p> <p>Subclause (d) seems to limit ‘operational difficulties’ to location issues without being explicit. AGL queries the value of this subclause (as currently drafted) and what other issues this term will cover.</p> <p>Re subclause (e) is drafted in line with AEMO’s revised meter churn procedures which take effect 1 September 2015. It may need to be amended where the ongoing Meter Replacement Rule is approved. Additional language added to clarify that the MP is the party taking action at a site, not the MC.</p> <p>Typo fixed in subclause (f). May also be amended where the Meter Replacement Rule is approved.</p>

	<p>meter churn resulting from an alteration or replacement of a metering installation under paragraph (d) (the 'meter churn procedures').</p> <p>(g) AEMO may from time to time and in accordance with the Rules consultation procedures, amend or replace the meter churn procedures</p>	<p>financially responsible Market Participant to consider in managing the meter churn resulting from an alteration or replacement of a metering installation under paragraph (g)(e) (the 'meter churn procedures').</p> <p>(g) AEMO may from time to time and in accordance with the Rules consultation procedures, amend or replace the meter churn procedures</p>	
24	<p>Clause 7.9.1: Responsibility for Testing</p> <p>(a) A person that carries out testing of a metering installation under this clause 7.9.1 must do so in accordance with:</p> <ol style="list-style-type: none"> (1) this clause 7.9.1; and (2) the relevant inspection and testing requirements set out in Schedule 7.6. <p>(b) A Registered Participant may request that the Metering Coordinator make arrangements for the testing of a metering installation and if the request is reasonable, the Metering Coordinator must:</p> <ol style="list-style-type: none"> (1) not refuse the request; and (2) make arrangements for the testing. <p>(c) Where the Metering Coordinator does not undertake the testing requested under paragraph (b), the Metering Coordinator must advise AEMO that the requested testing has not been undertaken and AEMO must make the arrangements for the testing where, in AEMO's reasonable opinion, it is practicable for AEMO to do so.</p> <p>(d) The Registered Participant who requested the tests under paragraph (b) may make a request to the Metering Coordinator to witness the tests.</p> <p>(e) The Metering Coordinator must not refuse a request received under paragraph (d) and must no later than 5 business days prior to the testing, advise:</p> <ol style="list-style-type: none"> (1) the party making the request; and (2) the financially responsible Market Participant, of: (3) the location and time of the tests; and (4) the method of testing to be undertaken. <p>(f) The Metering Coordinator and AEMO must co-operate for the purpose of making arrangements for AEMO to inspect or test the metering installation where:</p> <ol style="list-style-type: none"> (1) the Metering Coordinator must give AEMO access to the metering installation; and (2) AEMO must: 	<p>Clause 7.9.1:</p> <p>(a) A person that carries out testing of a metering installation under this clause 7.9.1 must do so in accordance with:</p> <ol style="list-style-type: none"> (1) this clause 7.9.1; and (2) the relevant inspection and testing requirements set out in Schedule 7.6. <p>(b) A Registered Participant may request that the Metering Coordinator make arrangements for the testing of a metering installation and if the request is reasonable, the Metering Coordinator must:</p> <ol style="list-style-type: none"> (1) not refuse the request; and (2) make arrangements with the appointed Meter Provider for the testing. <p>(c) Where the Metering Coordinator does not arrange undertake the testing requested under paragraph (b), the Metering Coordinator must advise AEMO that the requested testing has not been arranged undertaken and AEMO must make the arrangements for the testing where, in AEMO's reasonable opinion, it is practicable for AEMO to do so.</p> <p>(d) The Registered Participant who requested the tests under paragraph (b) may make a request to the Metering Coordinator to witness the tests.</p> <p>(e) The Metering Coordinator must not refuse a request received under paragraph (d) and must no later than 5 business days prior to the testing, advise:</p> <ol style="list-style-type: none"> (1) the party making the request; and (2) the financially responsible Market Participant, of: (3) the location and time of the tests; and (4) the method of testing to be undertaken. <p>(f) The Metering Coordinator and AEMO must co-operate for the purpose of making arrangements for AEMO to inspect or test the metering installation where:</p> <ol style="list-style-type: none"> (1) the Metering Coordinator must give AEMO access to the metering installation; and 	<p>Suggested changes to clarify that the role of MC is coordination of services and arranging access to the connection point.</p> <p>AGL suggests that the AEMC review all references to MC to determine whether they align with intended responsibilities and obligations.</p>

	<p>(i) no later than seven business days prior to the testing or inspection, give the Metering Coordinator notice of:</p> <p>(A) its intention to access the metering installation for the purpose of inspection or testing;</p> <p>(B) the name of the representative who will be conducting the test or inspection on behalf of AEMO; and</p> <p>(C) the time when the test or inspection will commence and the expected time when the test or inspection will conclude; and</p> <p>(ii) where reasonable, comply with the security and safety requirements of the Metering Coordinator.</p> <p>(g) Where AEMO or the Metering Coordinator has undertaken testing of a metering installation under this clause 7.9.1 and Schedule 7.6, AEMO or the Metering Coordinator (as the case may be) must:</p> <p>(1) inform the financially responsible Market Participant that testing has been undertaken in respect of the metering installation in accordance with this clause 7.9.1; and</p> <p>(2) make the test results available in accordance with paragraphs (h) and (i) and, on request of the financially responsible Market Participant, to the financially responsible Market Participant.</p> <p>(h) If the test results referred to in paragraph (g) indicate deviation from the technical requirements for that metering installation, the results must be made available as soon as practicable to the persons who are entitled to that metering data under clauses 7.15.5(a) .</p> <p>(i) If the test results referred to in paragraph (g) indicate compliance with the technical requirements for that metering installation, the test results must be made available as soon as practicable:</p> <p>(1) in circumstances where the tests were requested by a Registered Participant, to the Registered Participant and persons who are entitled to that metering data under clauses 7.15.5(a) ; or</p>	<p>(2) AEMO must:</p> <p>(i) no later than seven business days prior to the testing or inspection, give the Metering Coordinator notice of:</p> <p>(A) its intention to access the metering installation for the purpose of inspection or testing;</p> <p>(B) the name of the representative who will be conducting the test or inspection on behalf of AEMO; and</p> <p>(C) the time when the test or inspection will commence and the expected time when the test or inspection will conclude; and</p> <p>(ii) where reasonable, comply with the security and safety requirements set out by the appointed Meter Provider and as instructed by of the Metering Coordinator.</p> <p>(g) Where the Metering Coordinator has arranged testing of, or AEMO has undertaken or the Metering Coordinator has undertaken testing of a metering installation under this clause 7.9.1 and Schedule 7.6, AEMO or the Metering Coordinator (as the case may be) must:</p> <p>(1) inform the financially responsible Market Participant that testing has been undertaken in respect of the metering installation in accordance with this clause 7.9.1; and</p> <p>(2) make the test results available in accordance with paragraphs (h) and (i) and, on request of the financially responsible Market Participant, to the financially responsible Market Participant.</p> <p>(h) If the test results referred to in paragraph (g) indicate deviation from the technical requirements for that metering installation, the results must be made available as soon as practicable to the persons who are entitled to that metering data under clauses 7.15.5(a) .</p> <p>(i) If the test results referred to in paragraph (g) indicate compliance with the technical requirements for that metering installation, the test results must be made available as soon as practicable:</p>	
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	<p>(2) to a Registered Participant if requested by that Registered Participant, where the tests are not the result of a request for testing.</p> <p>(j) AEMO must check test results recorded in the metering register by arranging for sufficient audits annually of metering installations and to satisfy itself that the accuracy of each metering installation complies with the requirements of this Chapter 7.</p> <p>(k) The Metering Coordinator must store the test results in accordance with clause 7.9.5 and provide a copy to AEMO upon request or as part of an audit.</p> <p>(l) The cost of any test under paragraph (b) must be borne by:</p> <ol style="list-style-type: none"> (1) if paragraph (h) applies, the Metering Coordinator; and (2) otherwise, the Registered Participant who requested the test. 	<p>(1) in circumstances where the tests were requested by a Registered Participant, to the Registered Participant and persons who are entitled to that metering data under clauses 7.15.5(a) ; or</p> <p>(2) to a Registered Participant if requested by that Registered Participant, where the tests are not the result of a request for testing.</p> <p>(j) AEMO must check test results recorded in the metering register by arranging for sufficient audits annually of metering installations and to satisfy itself that the accuracy of each metering installation complies with the requirements of this Chapter 7.</p> <p>(k) The Metering Coordinator must store the test results in accordance with clause 7.9.5 and provide a copy to AEMO upon request or as part of an audit.</p> <p>(l) The cost of any test under paragraph (b) must be borne by:</p> <ol style="list-style-type: none"> (1) if paragraph (h) applies, the Metering Coordinator; and (2) otherwise, the Registered Participant who requested the test. 	
25	<p>Clause 7.10.1: Metering Data Services</p> <p>(a) Metering Data Providers must provide metering data services in accordance with the Rules and procedures authorised under the Rules, including:</p> <ol style="list-style-type: none"> (1) collecting metering data by local access or by remote acquisition; (2) the validation and substitution of metering data for a type 1, 2, 3 and 4 metering installation; (3) the validation, substitution and estimation of metering data for a type 4A, 5 and 6 metering installation; (4) the calculation, estimation and substitution of metering data for a type 7 metering installation; 	<p>Clause 7.10.1</p> <p>(a) Metering Data Providers must provide metering data services in accordance with the Rules and procedures authorised under the Rules, including:</p> <ol style="list-style-type: none"> (1) collecting metering data by local access or by remote acquisition; (2) the validation and substitution of metering data for a type 1, 2, 3 and 4, 4B metering installation; (3) the validation, substitution and estimation of metering data for a type 4A, 5 and 6 metering installation; (4) the calculation, estimation and substitution of metering data for a type 7 metering installation; 	See Change No 5
26	<p>Clause 7.10.4: Periodic Energy Metering</p> <p>(a) The Metering Data Provider must, for type 1, 2, 3, 4, 4A and 5 metering installations, collate metering data relating to:</p> <ol style="list-style-type: none"> (1) the amount of active energy; and (2) reactive energy (where relevant) passing through a connection point, 	<p>Clause 7.10.4</p> <p>(a) The Metering Data Provider must, for type 1, 2, 3, 4, 4A, 4B and 5 metering installations, collate metering data relating to:</p> <ol style="list-style-type: none"> (1) the amount of active energy; and (2) reactive energy (where relevant) passing through a connection point, 	See Change No 5

	in trading intervals within a metering data services database unless it has been agreed between AEMO, the Local Network Service Provider and the financially responsible Market Participant that metering data may be recorded in sub-multiples of a trading interval.	in trading intervals within a metering data services database unless it has been agreed between AEMO, the Local Network Service Provider and the financially responsible Market Participant that metering data may be recorded in sub-multiples of a trading interval.	
27	<p>Clause 7.11.3: Changes to energy data or to metering data</p> <p>(a) The Metering Coordinator must ensure that energy data held in a metering installation is not be altered except when the meter is reset to zero as part of a repair or reprogramming.</p>	<p>Clause 7.11.3</p> <p>(a) The Metering Coordinator must ensure that energy data held in a metering installation is not to be altered except when the meter is reset to zero as part of a repair or reprogramming.</p>	Fixed typo
28	<p>Clause 7.15.2: Security of metering installations</p> <p>(c) If a Local Network Service Provider, financially responsible Market Participant, Metering Provider or Metering Data Provider becomes aware that a seal protecting metering equipment has been broken, it must notify the Metering Coordinator within 5 business days.</p> <p>(d) If a broken seal has not been replaced by the person who notified the Metering Coordinator under paragraph (c), the Metering Coordinator must replace the broken seal no later than:</p> <ol style="list-style-type: none"> (1) the first occasion on which the metering equipment is visited to take a reading; or (2) 100 days, after receipt of notification that the seal has been broken. <p>(e) The costs of replacing broken seals as required by paragraph (d) are to be borne by:</p> <ol style="list-style-type: none"> (1) the financially responsible Market Participant if the seal was broken by a retail customer of that Market Participant; (2) a Registered Participant if the seal was broken by the Registered Participant; (3) the Metering Provider if the seal was broken by the Metering Provider; (4) the Metering Data Provider if the seal was broken by the Metering Data Provider; or (5) otherwise by the Metering Coordinator. <p>(f) If it appears that as a result of, or in connection with, the breaking of a seal referred to in paragraph (c) that the relevant metering equipment may no longer meet the relevant minimum standard, the</p>	<p>Clause 7.15.2</p> <p>(c) If a Local Network Service Provider, financially responsible Market Participant, Metering Provider or Metering Data Provider becomes aware that a seal protecting metering equipment has been broken, it must notify the Metering Coordinator within 5 business days.</p> <p>(d) If a broken seal has not been replaced by the person who notified the Metering Coordinator under paragraph (c), the Metering Coordinator must replace the broken seal no later than:</p> <ol style="list-style-type: none"> (1) the first occasion on which the metering equipment is visited to take a reading; or (2) 100 days, after receipt of notification that the seal has been broken. <p>(e) The costs of replacing broken seals as required by paragraph (d) are to be borne by:</p> <ol style="list-style-type: none"> (1) the financially responsible Market Participant if the seal was broken by a retail customer of that Market Participant; (2) a Registered Participant if the seal was broken by the Registered Participant; (3) the Metering Provider if the seal was broken by the Metering Provider; (4) the Metering Data Provider if the seal was broken by the Metering Data Provider; or (5) otherwise by the Metering Coordinator. <p>(f) If it appears that as a result of, or in connection with, the breaking of a seal referred to in paragraph (c) that the relevant metering equipment may no longer meet the relevant minimum standard, the Metering Coordinator must ensure that the metering equipment is tested.</p>	<p>Subclause (d) infers that the metering installation is an interval or accumulation metering installation, and therefore cannot be remotely read. Therefore neither (1) nor (2) works.</p> <p>Re subclause (g) - AGL considers that currently drafting restricts a retailer's ability (through its MC) to remotely reconnect or disconnect a metering installation. The intent of the rule is that both DBs and Retailers are able to undertake these actions remotely but that they must inform the other where they take action. Additionally, there is no link back to 7.3.2.</p>

	<p>Metering Coordinator must ensure that the metering equipment is tested.</p> <p>(g) A Metering Coordinator must not prevent, hinder or otherwise impede a Local Network Service Provider from locally accessing a metering installation or connection point for the purposes of reconnecting or disconnecting the connection point</p>	<p>(g) A Metering Coordinator must not prevent, hinder or otherwise impede a Local Network Service Provider from locally accessing a metering installation or connection point for the purposes of reconnecting or disconnecting the connection point</p>	
29	<p>Clause 7.15.3: Security controls for energy data</p> <p>(e) The Metering Provider must forward a copy of the passwords held under paragraph (d) to AEMO on request by AEMO for metering installations types 1, 2,3 and 4.</p>	<p>Clause 7.15.3</p> <p>(e) The Metering Provider must forward a copy of the passwords held under paragraph (d) to AEMO on request by AEMO for metering installations types 1, 2,3, and 4, 4A, and 4B.</p>	See Change No 5
30	<p>Clause 7.15.5: Access to data</p> <p>(a) The only persons who may be granted access to energy data or may receive metering data, NMI Standing Data, settlements ready data or data from the metering register for a metering installation are:</p> <ol style="list-style-type: none"> (1) Registered Participants with a financial interest in the metering installation or the energy measured by that metering installation; (2) the Metering Coordinator appointed with respect to that metering installation; (3) the Metering Provider who has been appointed with respect to that metering installation in accordance with clause 7.3.2(a); (4) financially responsible Market Participants in accordance with the meter churn procedures; (5) the Network Service Provider or providers associated with the connection point; (6) AEMO and its authorised agents; (7) the energy ombudsman in accordance with paragraphs (f), (g) and (h); (8) a retail customer or customer authorised representative, upon request by that retail customer or its customer authorised representative to the financially responsible Market Participant or Distribution Network Service Provider in relation to that retail customer's metering installation; 	<p>Clause 7.15.5:</p> <p>(a) The only persons who may be granted access to energy data or may receive metering data, NMI Standing Data, settlements ready data or data from the metering register for a metering installation are: (1) Registered Participants with a financial interest in the metering installation or the energy measured by that metering installation;</p> <ol style="list-style-type: none"> (2) the Metering Coordinator appointed with respect to that metering installation in accordance with clause 7.3 and 7.6; (3) the Metering Provider who has been appointed with respect to that metering installation in accordance with clause 7.3.2(a); (4) financially responsible Market Participants in accordance with the meter churn procedures; (5) the Network Service Provider or providers associated with the connection point; (6) AEMO and its authorised agents; (7) the energy ombudsman in accordance with paragraphs (f), (g) and (h); (8) a retail customer or customer authorised representative, upon request by that retail customer or its customer authorised representative to the financially responsible Market Participant or Distribution Network Service Provider in relation to that retail customer's metering installation; 	<p>AGL is not clear on the difference between subclauses (a)(8) and (a)(10)/(a)(9).</p> <p>We also query what is the definition of "retail customer" in this context.</p>

	<p>(9) if a small customer has consented to a person accessing the metering data from its small customer metering installation in accordance with clause 7.15.4(b)(2), to that person;</p> <p>(10) a large customer or a customer authorised representative, in relation to data from the metering installation in respect of the connection point of the large customer;</p> <p>(11) the AER or Jurisdictional Regulators upon request to AEMO; and</p> <p>(12) the Metering Data Provider who has been appointed to provide metering data services with respect to that metering installation in accordance with clause 7.3.2(d).</p>	<p>(9) if a small customer has consented to a person accessing the metering data from its small customer metering installation in accordance with clause 7.15.4(b)(2), to that person;</p> <p>(10) a large customer or a customer authorised representative, in relation to data from the metering installation in respect of the connection point of the large customer;</p> <p>(11) the AER or Jurisdictional Regulators upon request to AEMO; and</p> <p>(12) the Metering Data Provider who has been appointed to provide metering data services with respect to that metering installation in accordance with clause 7.3.2(d).</p>	
31	<p>Clause 7.16.3: Requirements of the metrology procedure</p> <p>(c) The metrology procedure must include:</p> <p>(1) information on the devices and processes that are to be used to:</p> <p>(i) measure, or determine by means other than a device, the flow of electricity in a power conductor;</p> <p>(ii) convey the measured or determined data under subparagraph (i) to other devices;</p> <p>(iii) prepare the data using devices or algorithms to form metering data; and</p> <p>(iv) provide access to the metering data from a telecommunications network;</p> <p>(2) the requirements for the provision, installation and maintenance of metering installations;</p> <p>(3) the obligations of Metering Coordinators, financially responsible Market Participants, Local Network Service Providers, Metering Providers and Metering Data Providers;</p>	<p>Clause 7.16.3</p> <p>(c) The metrology procedure must include:</p> <p>(1) information on the devices and processes that are to be used to:</p> <p>(i) measure, or determine by means other than a device, the flow of electricity in a power conductor;</p> <p>(ii) convey the measured or determined data under subparagraph (i) to other devices;</p> <p>(iii) prepare the data using devices or algorithms to form metering data; and</p> <p>(iv) provide access to the metering data from a telecommunications network;</p> <p>(2) the requirements for the provision, installation and maintenance of metering installations;</p> <p>(3) the obligations of Metering Coordinators, financially responsible Market Participants, Local Network Service Providers, Metering Providers and Metering Data Providers;</p>	<p>AGL queries what obligations subclause (c)(3) will include.</p>
32	<p>Part G - 7.16: Procedures</p> <p>Covers the following clauses:</p>	<p>Clause 7.16</p> <p>Areas of concern:</p>	<p>References to "Information Exchange Committee" are dependent on the proposed AEMC Rule on the Shared Market Protocol (SMP). Where changes are undertaken, clauses 7.16.1(c),</p>

	<ul style="list-style-type: none"> 7.16.1: Obligation to establish, maintain and publish procedures 7.16.2: Market Settlement and Transfer Solution (MSATS) procedure 7.16.3: Requirements of the metrology procedure 7.16.4: Jurisdictional metrology material in metrology procedure 7.16.5: Additional metrology procedure matters 7.16.6: Requirements of the service level procedures 7.16.7: Amendment of procedures in the Metering Chapter <p>Part H – 7.17: B2B Requirements</p> <p>Covers the following clauses:</p> <ul style="list-style-type: none"> 7.17.1: B2B e-Hub 7.17.2: Information Exchange Committee 7.17.3: Method of making and changing B2B Procedures 7.17.4: Content of the B2B Procedures 7.17.5: Cost Recovery 	<ul style="list-style-type: none"> All references to “Information Exchange Committee” re proposed changes to introduce the Shared Market Protocol. All references to “Ministers of the MCE” re changes taken by COAG to amend the operations and mandates of their ministerial councils. Clause 7.16.5 <p>(a) The metrology procedure may:</p> <p>(1) clarify the operation of the Rules in relation to:</p> <p>(i) load profiling;</p> <p>(ii) the provision and maintenance of meters;</p> <p>(iii) the provision of metering data services;</p> <p>(iv) metrology for a market load connected to a network where the owner or operator of that network is not a Registered Participant;</p> <p>(v) the accreditation of Metering Providers and Metering Data Providers; and</p> <p>(vi) with respect to the provision, installation and maintenance of metering installations and the provision of metering data services, the obligations of Metering Coordinators, financially responsible Market Participants, Local Network Service Providers, AEMO, Metering Providers and Metering Data Providers;</p>	<p>7.16.1(d) and Part H – clause 7.17 will also need to be amended. Any amended to NER and NERR should happen on the same time to minimise impact to industry.</p> <p>AGL also queries how all proposed changes to NER Chapter 7 will be introduced and work with existing market functions.</p> <p>Reference to “Ministers of the MCE” under the NER means: <i>“Ministers of the participating jurisdictions acting as the MCE where MCE has the same meaning as in the National Electricity Law.”</i></p> <p>Where MCE under the National Electricity (SA) Act 1996 means: <i>“the Ministerial Council on Energy established on 8 June 2001, being the Council of Ministers with primary carriage of energy matters at national level comprising the Ministers representing the Commonwealth, the States, the Australian Capital Territory and the Northern Territory, acting in accordance with its own procedures”</i></p> <p>Given there is no reference to changes to the definition of “MCE” under the National Electricity Act 1996, there is already a breach (albeit minor) under the NER as the MCE was replaced with the Standing Council on Energy and Resources. This needs to be amended immediately.</p> <p>Again, AGL is unclear what that “obligations of Metering Coordinators” reference in subclause 7.16.5(a)(vi) refers.</p>
33	<p>Clause S7.2.2: Categories of Registration</p> <p>(a) Registrations for Metering Providers in relation to the provision, installation and maintenance of metering installation types 1, 2, 3, 4 and 4A must be categorised in accordance with Tables S7.2.2.1, S7.2.2.2 and S7.2.2.3, or other procedures approved by AEMO.</p>	<p>Clause S7.2.2:</p> <p>(a) Registrations for Metering Providers in relation to the provision, installation and maintenance of metering installation types 1, 2, 3, 4, and 4A and 4B must be categorised in accordance with Tables S7.2.2.1, S7.2.2.2 and S7.2.2.3, or other procedures approved by AEMO.</p>	<p>Refer to Change No 5</p>
34	<p>Clause S7.2.3: Capabilities of Metering Providers for metering installations type 1,2,3,4 and 4A</p>	<p>Clause S7.2.3: Capabilities of Metering Providers for metering installations type 1,2,3,4, and 4A and 4B</p>	<p>Change of heading to include 4B metering installations. Refer to Change No 5</p>
35	<p>Clause S7.2.6: Capabilities of the Accredited Service Provider category</p>	<p>Clause s7.2.6</p>	<p>Refer to Change No 5</p>

		(a) The Accredited Service Providers categories established by AEMO under clause S7.2.2(d) may perform work relating to the installation of any types 1, 2, 3, 4, 4A, 4B, 5 or 6 metering installations.	
36	Clause S7.3.2: Categories of registration Refer to Table S7.3.2.1	Clause S7.3.2.1 Refer to Table S7.3.2.1 – Add metering installation 4B to first row under header “Metering installation type”.	Refer to Change No 5
37	Schedule 4: Amendment to the NER Chapter 10: Omitted Definitions Chapter 10: Substituted Definitions Chapter 10: New Definitions	Schedule 4: Amendment to the NER Chapter 10: Omitted Definitions Chapter 10: Substituted Definitions Chapter 10: New Definitions (Sections too long to insert – review from revised NER).	AGL supports the omission of the “unmetered connection point” definition. However, we are not clear re the “Substituted definitions” section. The AEMC’s drafting does not make clear what replacement definitions will be introduced in place of these existing definitions (which are important to Chapter 7 – old and new clauses). AGL also queries how the “New Definitions have been developed.” AGL disputes the definition of “network device” (in line with our submission to the draft rule). Some new definitions such as “Jurisdictional Safety Regulator” is missing, and there is no mention of the policy definitions introduced in the Draft Determination around types of metering installations such as “new meter deployment” etc. These definitions only appear in the NERR and are out of place.
38	Clause 11.78.6: New and Amended Procedures (a) By 1 April 2016, AEMO must amend and publish the following procedures to take into account the Amending Rule: (i) service level procedures; (ii) Market Settlement and Transfer Solution Procedures; (iii) metrology procedure; (iv) meter churn procedures; and (v) RoLR Procedures. (b) By 1 April 2016, AEMO must develop and publish the following procedures to take into account the Amending Rule: (i) emergency priority procedures; and (ii) procedures relating to the minimum service specification in accordance with clause 7.8.3(c) of new Chapter 7.	Clause 11.78.6: (a) By 1 April 2016, AEMO must amend, consult with industry and publish the following procedures to take into account the Amending Rule: (i) service level procedures; (ii) Market Settlement and Transfer Solution Procedures; (iii) metrology procedure; (iv) meter churn procedures; and (v) RoLR Procedures. (b) By 1 April 2016, AEMO must develop, consult with industry and publish the following procedures to take into account the Amending Rule: (i) emergency priority procedures; and	Re subclauses 11.78.6 (a) to (d) – AGL suggests the addition of “consult with industry” to ensure that AEMO consults with industry with respect to the amendment or creation of procedures. Re subclause 11.78.6(e) – note that the IEC may not be the appropriate body to manage B2B procedures, dependent on where the Shared Market Protocol advice differs to current operations. Refer and align position with Change No 31.

	<p>(c) AEMO in its complete discretion may amend the service level procedures to make provision for the procedures listed in paragraph (b) instead of developing new procedures.</p> <p>(d) By 1 October 2016, AEMO must develop and publish information relating to the process by which persons can apply for registration as Metering Coordinators under rule 2.4A to take into account the Amending Rule.</p> <p>(e) The Information Exchange Committee must ensure that the B2B Procedures are amended to take into account the Amending Rule and published by 1 April 2016.</p>	<p>(ii) procedures relating to the minimum service specification in accordance with clause 7.8.3(c) of new Chapter 7.</p> <p>(c) AEMO in its complete discretion may, but in consultation with industry, amend the service level procedures to make provision for the procedures listed in paragraph (b) instead of developing new procedures.</p> <p>(d) By 1 October 2016, AEMO must develop, consult with industry and publish information relating to the process by which persons can apply for registration as Metering Coordinators under rule 2.4A to take into account the Amending Rule.</p> <p>(e) The Information Exchange Committee must ensure that the B2B Procedures are amended to take into account the Amending Rule and published by 1 April 2016.</p>	
39	<p>Clause 11.78.7: Metering Coordinator for type 5 or 6 metering installations from effective date</p> <p>(a) On and from the effective date, a Local Network Service Provider that was the responsible person for a type 5 or 6 metering installation connected to, or proposed to be connected to, the Local Network Service Provider's network under clause 7.2.3(a)(2) or clause 9.9C.3 immediately before the effective date must be appointed as the Metering Coordinator by the financially responsible Market Participant.</p> <p>(b) At least 3 months prior to the effective date, the Local Network Service Provider must provide each financially responsible Market Participant with a standard set of terms and conditions on which it will agree to act as the Metering Coordinator with respect to a type 5 or type 6 metering installation referred to in paragraph (a).</p> <p>(c) Unless the financially responsible Market Participant and Local Network Service Provider agree other terms and conditions to apply to the Local Network Service Provider's appointment as the Metering Coordinator under paragraph (a) prior to the effective date, the Local Network Service Provider will be deemed to be appointed as the Metering Coordinator on the standard terms and conditions of appointment referred to in paragraph (b) on and from the effective date.</p> <p>(d) The terms and conditions on which a Local Network Service Provider is appointed as Metering Coordinator under paragraph (a) or</p>	<p>Clause 11.78.7:</p> <p>(a) On and from the effective date, a Local Network Service Provider that was the responsible person for a type 5 or 6 metering installation connected to, or proposed to be connected to, the Local Network Service Provider's network under clause 7.2.3(a)(2) or clause 9.9C.3 immediately before the effective date must be appointed as the Metering Coordinator by the financially responsible Market Participant.</p> <p>(b) At least 3 months prior to the effective date, the Local Network Service Provider must provide each financially responsible Market Participant with a standard set of terms and conditions on which it will agree to act as the Metering Coordinator with respect to a type 5 or type 6 metering installation referred to in paragraph (a).</p> <p>(c) Unless the financially responsible Market Participant and Local Network Service Provider agree other terms and conditions to apply to the Local Network Service Provider's appointment as the Metering Coordinator under paragraph (a) prior to the effective date, the Local Network Service Provider will be deemed to be appointed as the Metering Coordinator on the standard terms and conditions of appointment referred to in paragraph (b) on and from the effective date.</p> <p>(d) The terms and conditions on which a Local Network Service Provider is appointed as Metering Coordinator under paragraph (a) or deemed to be appointed as Metering Coordinator under paragraph (c) must:</p> <p>(1) include terms as to price which are consistent with Chapter 6 and, where relevant, Chapter 11;</p>	<p>AGL does not support the addition of subclause 11.78.7 (e) – we consider there should be no ability for the FRMP to pay the LNSP an exit fee for the termination of initial MC functions.</p> <p>The only exception is where an exit fee is either agreed as part of the commercial terms between the two parties or appears in the LNSP's standard terms and conditions. This is a commercial issue and should not appear in the NER.</p> <p>AGL has also suggested new text in subclause 11.78.7(h) to clearly allow the FRMP to appoint a new MC.</p>

<p>deemed to be appointed as Metering Coordinator under paragraph (c) must:</p> <p>(1) include terms as to price which are consistent with Chapter 6 and, where relevant, Chapter 11;</p> <p>(2) include a scope of services which is consistent with the responsibilities of the Metering Coordinator with respect to the connection point under Chapter 7;</p> <p>(3) provide that the financially responsible Market Participant may terminate the appointment or deemed appointment on reasonable notice to the Metering Coordinator; and</p> <p>(4) subject to paragraph (e), must not prevent, hinder or otherwise impede a financially responsible Market Participant from appointing a person other than the Local Network Service Provider as Metering Coordinator on any day following the effective date.</p> <p>(e) Subparagraph (d)(4) does not prevent the terms and conditions on which a Metering Coordinator is appointed under paragraph (a) from including a requirement for the financially responsible Market Participant to pay the Local Network Service Provider an exit fee when the appointment ceases, provided that the exit fee is consistent with Chapter 6 and, where relevant, Chapter 11.</p> <p>(f) An agreement between a Local Network Service Provider and the financially responsible Market Participant relating to the appointment of the Local Network Service Provider as Metering Coordinator under paragraph (a) may include agreed terms and conditions that are in addition to those required by paragraph (d), provided the additional terms and conditions are consistent with paragraph (d).</p> <p>(g) For the avoidance of doubt:</p> <p>(1) any Metering Coordinator appointed under paragraph (a) or deemed to be appointed under paragraph (c) must comply with Chapter 2 of the Rules, including the requirement that a Metering Coordinator be accredited and registered with AEMO as a Metering Coordinator under new clause 2.4A.1(a) of Chapter 2 of the Rules; and</p> <p>(2) to the extent of any inconsistency between this clause 11.78.7 and clause 7.6.1(a), this clause 11.78.7 prevails.</p>	<p>(2) include a scope of services which is consistent with the responsibilities of the Metering Coordinator with respect to the connection point under Chapter 7;</p> <p>(3) provide that the financially responsible Market Participant may terminate the appointment or deemed appointment on reasonable notice to the Metering Coordinator; and</p> <p>(4) subject to paragraph (e), must not prevent, hinder or otherwise impede a financially responsible Market Participant from appointing a person other than the Local Network Service Provider as Metering Coordinator on any day following the effective date.</p> <p>(e) Subparagraph (d)(4) does not prevent the terms and conditions on which a Metering Coordinator is appointed under paragraph (a) from including a requirement for the financially responsible Market Participant to pay the Local Network Service Provider an exit fee when the appointment ceases, provided that the exit fee is consistent with Chapter 6 and, where relevant, Chapter 11.</p> <p>(f) An agreement between a Local Network Service Provider and the financially responsible Market Participant relating to the appointment of the Local Network Service Provider as Metering Coordinator under paragraph (a) may include agreed terms and conditions that are in addition to those required by paragraph (d), provided the additional terms and conditions are consistent with paragraph (d).</p> <p>(g) For the avoidance of doubt:</p> <p>(1) any Metering Coordinator appointed under paragraph (a) or deemed to be appointed under paragraph (c) must comply with Chapter 2 of the Rules, including the requirement that a Metering Coordinator be accredited and registered with AEMO as a Metering Coordinator under new clause 2.4A.1(a) of Chapter 2 of the Rules; and</p> <p>(2) to the extent of any inconsistency between this clause 11.78.7 and clause 7.6.1(a), this clause 11.78.7 prevails.</p> <p>(h) An appointment under paragraph (a) or a deemed appointment under paragraph (c) will continue until the earlier of:</p> <p>(1) the services provided with respect to the metering installation ceasing to be classified by the AER as direct control services; or and</p>	
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	<p>(h) An appointment under paragraph (a) or a deemed appointment under paragraph (c) will continue until the earlier of:</p> <p>(1) the services provided with respect to the metering installation ceasing to be classified by the AER as direct control services; and</p> <p>(2) another Metering Coordinator being appointed with respect to that connection point under new Chapter 7.</p>	<p>(2) another Metering Coordinator being appointed by the financially responsible Market Participant in accordance with clause 11.78.7(d)(4), with respect to that connection point under new Chapter 7.</p>	
40	<p>Clause 11.78.8: Distribution Ring Fencing Guidelines</p> <p>(a) AER must by 1 July 2016 publish Distribution Ring-Fencing Guidelines.</p>	<p>Clause 11.78.8:</p> <p>(a) AER must:</p> <p>(1) develop the Distribution Ring-Fencing Guidelines and consult appropriately with industry;</p> <p>(2) publish the Distribution Ring-Fencing Guidelines by [1 July 2016]; and</p> <p>(3) meet all requirements in accordance with clause 6.17.2.</p>	<p>AGL has redrafted subclause 11.78.8(a) to tie in more closely with clause 6.17.2</p>
	NERR Changes		
41	<p>3 Definitions</p> <p><u>maintenance replacement</u> means the replacement of a small customer's existing electricity meter by a retailer that is based on the results of sample testing of a meter population carried out in accordance with Chapter 7 of the NER:</p> <p>(a) which indicates that it is necessary or appropriate, in accordance with good electricity industry practice, for the meter to be replaced to ensure compliance with the metering rules; and</p> <p>(b) details of which have been provided to the retailer under Chapter 7 of the NER, together with the results of the sample testing that support the need for the replacement.</p>	<p>maintenance replacement means the replacement of a small customer's existing electricity meter by a retailer that is based on the results of sample testing of a meter population carried out in accordance with Chapter 7 of the NER:</p> <p>(a) which indicates that it is necessary or appropriate, in accordance with good electricity industry practice, for the meter to be replaced to ensure compliance with the metering rules; and</p> <p>(b) details of which have been provided to the retailer under Chapter 7 of the NER, together with the results of the sample testing that support the need for the replacement.</p> <p>maintenance replacement, in the case of electricity - has the same meaning as "maintenance replacement" in the NER;</p>	<p>AGL suggests that "Maintenance Replacement" should be defined elsewhere - probably in the NER as it refers to a metrology process that doesn't sit with the function of the NERR.</p> <p>The NER can then choose to defer this definition to AEMO's Procedures. This means we can also remove other definitions that are only useful for explaining this definition (i.e. good electricity industry practice)</p>
42	<p>3 Definitions</p> <p><u>new meter deployment</u> means the replacement of the existing electricity meter of one or more small customers which is implemented by a retailer other than where the replacement is:</p>	<p>new meter deployment means the replacement of the existing electricity meter of one or more small customers which is implemented by a retailer other than where the replacement is:</p>	<p>AGL suggests that "New Meter Deployment" should be defined elsewhere - probably in the NER as it refers to a metrology process that doesn't sit with the function of the NERR.</p> <p>The NER can then choose to defer this definition to AEMO's Procedures. This means we can also remove other definitions that</p>

	<p>(a) at the request of the relevant small customer or to enable the provision of a product or service the customer has agreed to acquire;</p> <p>(b) a maintenance replacement; or</p> <p>(c) as a result of a metering installation malfunction;</p>	<p>(a) at the request of the relevant small customer or to enable the provision of a product or service the customer has agreed to acquire;</p> <p>(b) a maintenance replacement; or</p> <p>(c) as a result of a metering installation malfunction;</p> <p>new meter deployment, in the case of electricity - has the same meaning as "new meter deployment" in the NER;</p>	<p>are only useful for explaining this definition (i.e. good electricity industry practice, maintenance replacement)</p>
43	<p>3 Definitions</p> <p><u>responsible person</u>, in the case of gas - means the person who, under the applicable Retail Market Procedures, is responsible for meter reading</p>	<p>Review usage throughout Rules</p>	<p>The concept of a responsible person does not exist in the gas Procedures. The term "responsible person" was drafted into the NERR as it took from the electricity Rules. If the term is to be removed on the basis of it having no further relevance for electricity, then we should question why it is being used for gas.</p> <p>There may be some merit to simply replacing the term with Distributor throughout the Rules. However, it may equally be useful to keep a separate term for gas customers in the event that competitive metering arrangements eventually extend to gas installations also.</p> <p>It may be the case that the term "metering coordinator" can also extend to gas installations, to the extent that a gas metering coordinator "<i>in the case of gas—means the person who, under the applicable Retail Market Procedures, is responsible for meter reading</i>".</p> <p>In any event, retaining the term simply for gas customers seems to be a bit unnecessary and adds undue complexity.</p>
44	<p>20 Basis for bills (SRC and MRC)</p> <p>(2) The retailer must use its best endeavours to ensure that actual readings of the meter are carried out as frequently as is required to prepare its bills consistently with the metering rules and in any event at least once every 12 months.</p>	<p>20 Basis for bills (SRC and MRC)</p> <p>(2)</p> <p>(a) The retailer must use its best endeavours to ensure that actual readings of the meter are carried out as frequently as is required to prepare its bills consistently with the metering rules and in any event at least once every 12 months.</p> <p>(b) The metering coordinator or responsible person (as applicable) must use its best endeavours to ensure that the retailer is able to meet its obligations under (a).</p>	<p>AGL suggests a new subclause (2)(b) regarding provision of metering data to a retailer. This ties the metering obligation back to the metering coordinator, as under the proposed Rules, the MC could withhold from this obligation without any consequence.</p>
45	<p>25 Contents of bills (SRC and MRC)</p>	<p>25 Contents of bills (SRC and MRC)</p>	

	(2) The retailer must include amounts billed for goods and services (other than the sale and supply of energy (including the provision, installation and maintenance of a meter)) in a separate bill or as a separate item in an energy bill.	(2) The retailer must include amounts billed for goods and services (other than the sale and supply of energy and (including the provision, installation and maintenance of a meter)) in a separate bill or as a separate item in an energy bill.	AGL considers that this subclause (25)(2) is awkwardly worded. We are unsure of the intention here. Is it that metering charges will or will not be included as a separate line item in a bill? The drafting of this clause will depend on whether or not metering charges are bundled or unbundled and how they are passed through to the customer. The NERR needs to be particularly clear on this point.
46	46 Tariffs and charges (1) This rule sets out some minimum requirements that are to apply in relation to the terms and conditions of market retail contracts (other than a prepayment meter market retail contract). (2) A retailer must set out in a market retail contract with a small customer all tariffs and charges payable by the customer. (3) The retailer must give notice to the customer of any variation to the tariffs and charges that affects the customer. (4) The notice must be given as soon as practicable, and in any event no later than the customer's next bill. (5) The retailer must set out in the market retail contract the obligations with regard to notice that the retailer must comply with where the tariffs and charges are to be varied.		AGL queries how variations to metering charges will be communicated and passed through to the customer? Again, this depends in part on whether or not metering charges are bundled or unbundled or passed through to the customer as a separate charge. There are very strict NERR regarding notifying customer of price variations and changes. How will any changes to metering charges as a result of different pass through costs from MPs, MDPs, and MCs be communicated to the customer? Do basic metering charges need to be disclosed to the customer at sign up?
47	56 Provision of information to customers (1) A retailer must publish on its website a summary of the rights, entitlements and obligations of small customers, including: (a) the retailer's standard complaints and dispute resolution procedure; (b) the contact details for the relevant energy ombudsman; and (c) in respect of electricity, details of applicable energisation and re-energisation timeframes.	56 Provision of information to customers (1) A retailer must publish on its website a summary of the rights, entitlements and obligations of small customers, including: (a) the retailer's standard complaints and dispute resolution procedure; (b) the contact details for the relevant energy ombudsman; and (c) in respect of electricity, details of applicable energisation and re-energisation timeframes.	AGL queries this obligation. Will these be different for each MC or standardised? If standard, what is the point of publishing the timeframes? This is something that is out of the retailer's control and may vary depending on commercial arrangements between the MC and the MDP. In any event, this could be something that could be left in a guideline rather than a Rule and provided (if required) once arrangements and service level arrangements between parties have been finalised.
48	59A Notice to small customers on deployment of new electricity meters (SRC and MRC) (3) A notice under subrule (2)(a) and (b) must state:	59A Notice to small customers on deployment of new electricity meters (SRC and MRC) (3) A notice under subrule (2)(a) and (b) must state the information in subrule (4).	AGL considers that there is a potential timing issues with opting-out by writing. For example, does this mean that the retailer needs to have <u>received</u> communication regarding the customer's decision three days prior to the meter exchange?

	<p>(a) that the customer may opt out of having its meter replaced by informing the retailer:</p> <p>(i) in writing, electronically or by telephone; or</p> <p>(ii) by any other method made available by the retailer in addition to the methods specified in subrule (3)(a)(i),</p> <p>at any time up to the date specified in the notice as being the last day on which customers may exercise their right to opt out (referred to in this rule as the last opt-out date);</p> <p>(4) The customer may opt out of the proposed new meter deployment by informing the retailer:</p> <p>(a) in writing, electronically or by telephone; or</p> <p>(b) by any other method the retailer specifies in a notice under subrule (2)(a) or (b),</p> <p>to the address or other contact details specified in the notice at any time after receiving the first notice up until the last opt-out date.</p>	<p>(a) that the customer may opt out of having its meter replaced by informing the retailer:</p> <p>(i) in writing, electronically or by telephone; or</p> <p>(ii) by any other method made available by the retailer in addition to the methods specified in subrule (3)(a)(i);</p> <p>at any time up to the date specified in the notice as being the last day on which customers may exercise their right to opt out (referred to in this rule as the last opt-out date);</p> <p>(4) The customer may opt out of the proposed new meter deployment by informing the retailer:</p> <p>(a) in writing, electronically or by telephone; or</p> <p>(b) by any other method the retailer specifies in a notice under subrule (2)(a) or (b),</p> <p>to the address or other contact details specified in the notice at any time after receiving the first notice up until the last opt-out date (and where the notification of the customer's decision to opt-out is written it must be received by the retailer prior to the opt-out date).</p> <p>(6) If a customer has not opted out of the proposed new meter deployment in the manner outlined in subrule (4), then the retailer may proceed to arrange with a new meter deployment in accordance with the relevant energy laws.</p>	<p>AGL's preference would be to make it clear that it needs to have received notification from the customer by the opt-out date.</p> <p>More clarity that there is no obligation to cancel meter exchange after opt-out date has elapsed could also be put into the Rule.</p> <p>In terms of drafting, subclause (4) duplicates subclause (3) and this should be tidied up.</p>
49	<p>59A Notice to small customers on deployment of new electricity meters (SRC and MRC)</p> <p>(6) The retailer is not required to comply with this rule if, under the terms of customer's market retail contract, the retailer is authorised to undertake the new meter deployment.</p>	<p>59A Notice to small customers on deployment of new electricity meters (SRC and MRC)</p> <p>(6) The retailer is not required to comply with this rule if, under the terms of a customer's market retail contract, the retailer is authorised to undertake the new meter deployment with the previous consent of the customer.</p>	<p>AGL is unsure of the intention here.</p> <p>Clause 59A seems to lack utility if it can be amended by contract with the customer.</p> <p>If the intention here is that customer consent is not required for a metering replacement, then this should be made clearer. Suggested text included.</p>
50	<p>Division 2 Customer connection services</p> <p>79 Application for customer connection services</p>		<p>AGL considers that Clause 79 is not clear with respect to the requirements on the MC to provide metering services and energisation services to the customer.</p> <p>Is there an obligation for an MC to provide an energisation? If so, this should be included in this section.</p>
51	<p>Division 6 Distributor interruption to supply</p> <p>89 Distributor's right to interrupt supply</p> <p>A distributor may, subject to and in accordance with any requirements of the energy laws, interrupt the supply of energy at any time, including for a planned interruption or an unplanned interruption.</p>	<p>Division 6 Distributor interruption to supply</p> <p>89 Distributor's Right to interrupt supply</p> <p>(1) A distributor may, subject to and in accordance with any requirements of the energy laws, interrupt the supply of energy at any time, including for a planned interruption or an unplanned interruption.</p>	<p>AGL considers that interruption to supply obligations should probably consider MCs as well, given that they have the right to exchange a meter, which is clearly a planned interruption.</p>

		(2) A metering coordinator may, subject to and in accordance with any requirements of the energy laws, interrupt the supply of energy for a meter replacement.	<p>The best way of doing this would be to include a right under Rule 89.</p> <p>However, this raises the question of whether or not an MC needs to comply with notification requirements under Rule 90, and if they do, whether or not this should be in addition to the two notices that already need to be provided under the proposed Rule 59A.</p> <p>In addition, would a MP need to provide a 24 hour telephone number for enquiries? This seems completely unnecessary given the limited planned outages that will occur.</p>
52	<p>Division 6 Distributor interruption to supply</p> <p>planned interruption means an interruption of the supply of energy for:</p> <p>(a) the planned maintenance, repair or augmentation of the transmission system; or</p> <p>(b) the planned maintenance, repair or augmentation of the distribution system, including planned or routine maintenance of metering equipment; or</p> <p>(c) the installation of a new connection or a connection alteration;</p>	<p>Division 6 Distributor interruption to supply</p> <p>planned interruption means an interruption of the supply of energy for:</p> <p>(a) the planned maintenance, repair or augmentation of the transmission system; or</p> <p>(b) the planned maintenance, repair or augmentation of the distribution system, including planned or routine maintenance of metering equipment; or</p> <p>(c) the installation of a new connection, meter replacement, or a connection alteration;</p>	<p>AGL suggests that the text makes clear that this includes hanging a new meter by an MP.</p>
53	<p>90 Planned interruptions</p> <p>(1) Notice to be given In the case of a planned interruption, a distributor must notify each affected customer by any appropriate means of the interruption at least 4 business days before the date of the interruption.</p> <p>(2) Contents of notification The notification must:</p> <p>(a) specify the expected date, time and duration of the interruption; and</p> <p>(b) include a 24 hour telephone number for enquiries (the charge for which is no more than the cost of a local call); and</p> <p>(c) include a statement that any enquiries regarding planned interruptions are to be directed to the distributor.</p> <p>(3) Restoration of supply The distributor must use its best endeavours to restore the customer's supply as soon as possible.</p>	<p>90 Planned interruptions</p> <p>(1) Notice to be given In the case of a planned interruption, a distributor or metering coordinator (as applicable) must notify each affected customer by any appropriate means of the interruption at least 4 business days before the date of the interruption.</p> <p>(2) Contents of notification The notification must:</p> <p>(a) specify the expected date, time and duration of the interruption; and</p> <p>(b) in the case of a interruption by a distributor, include a 24 hour telephone number for enquiries (the charge for which is no more than the cost of a local call); and</p> <p>(c) include a statement that any enquiries regarding planned interruptions are to be directed to the distributor party responsible for performing interruption.</p> <p>(3) Restoration of supply The distributor or metering coordinator (as applicable) must use its best endeavours to restore the customer's supply as soon as possible.</p>	<p>In AGL's view, a single notice under Rule 59A followed by an outage notification would be sufficient.</p> <p>Alternately, two notices under 59A (one of which describes information relating to the outage) and no requirement to provide an outage notification would be appropriate.</p>

54	<p>91A Metering coordinator and distributor to assist and cooperate – electricity</p> <p>Where the installation, maintenance, repair or replacement of metering equipment is to be undertaken by the metering coordinator and requires an interruption of supply to the customer's premises: (a) the metering coordinator must provide such information and assistance as the distributor may reasonably require to enable the distributor to carry out its obligations under rules 90 and 91; and (b) the distributor must effect the interruption and provide such assistance as the metering coordinator may reasonably require to enable the metering coordinator to carry out the installation, maintenance, repair or replacement of metering equipment; and (c) the distributor and the metering coordinator must give all other reasonable assistance to each other, and cooperate with each other, in relation to the interruption and their respective obligations under these Rules.</p>	<p>91A Metering coordinator and distributor to assist and cooperate – electricity</p> <p>Where the installation, maintenance, repair or replacement of metering equipment is to be undertaken by the metering coordinator and requires an interruption of supply to the customer's premises: (a) the metering coordinator must provide such information and assistance as the distributor may reasonably require to enable the distributor to carry out its obligations under rules 90 and 91; and (b) the distributor must effect the interruption and provide such assistance as the metering coordinator may reasonably require to enable the metering coordinator to carry out the installation, maintenance, repair or replacement of metering equipment; and (c) The distributor and the metering coordinator must give all other reasonable assistance to each other, and cooperate with each other, in relation to the interruptions and their respective obligations under these Rules.</p>	<p>AGL considers this incorrect. For the purposes of a metering replacement, the Distributor will not be effecting an outage or providing an outage notification. This will be the MC's responsibility.</p> <p>As such, the intention of this section needs to be completely reviewed with reference to the proposed changes above relating to NERR clause 90.</p> <p>The only relevant obligation here appears to be subclause (c), whereby the MC and the distributor should provide assistance to each other regarding information pertaining to interruptions at sites, whether they be distributor or MC-initiated interruptions.</p>
55	<p>Part 5 Relationship between distributors and retailers—retail support obligations</p>	<p>Division 2 Assistance and cooperation 94 Assistance and cooperation</p> <p>(5) Market participants under the NGR and NER must use best endeavours to ensure that the retailer and the distributor can meet their obligations under the Law, the Regulations, these Rules and the Retail Market Procedures.</p>	<p>AGL suggests that this clause could consider other market participants under the NER and NGR, where those participants have a function that supports either the retailer or distributor from meeting their obligation under the NERR.</p> <p>Increasingly, the MDP, MC and MP have important roles to the effective operation of the NERR. It may be the case that they should be included in the effective operation of the NERR by reference.</p>
56	<p>97 Distributor and retailer contact details</p> <p>(1) The distributor must provide the distributor's contact details to the retailer. (2) The retailer must provide to the distributor: (a) the retailer's contact details; and (b) the name and contact details of the retailer's NEM Representative (if applicable); and (c) the name and contact details of the metering coordinator appointed by the retailer or the large customer in respect of each shared customer (if applicable).</p>	<p>97 Distributor and retailer contact details</p> <p>(1) The distributor must provide the distributor's contact details to the retailer. (2) The retailer must provide to the distributor: (a) the retailer's contact details; and (b) the name and contact details of the retailer's NEM Representative (if applicable); and (c) the name and contact details of the metering coordinator appointed by the retailer or the large customer in accordance with the relevant energy laws in respect of each shared customer (if applicable).</p>	<p>Subclause (c) should read, appointed in accordance with the NER rather than "by retailer or large customer"</p>
57	<p>Division 4 Shared customer enquiries and complaints 101 Enquiries or complaints relating to the retailer</p> <p>(1) If a shared customer makes an enquiry or complaint to the distributor about an issue relating to the sale of energy, including an</p>	<p>Division 4 Shared customer enquiries and complaints 101 Enquiries or complaints relating to the retailer</p> <p>(1) If a shared customer makes an enquiry or complaint to the distributor about an issue relating to the sale of energy, including an</p>	<p>AGL considers this to be an unnecessary addition. How do distributors discern between an issue with "connection services" and an issue with the meter?</p>

	enquiry or complaint relating to the customer's electricity meter, the distributor must:	enquiry or complaint relating to the customer's electricity meter, the distributor must:	Not all perceived metering issues will be able to be resolved by the retailer.
58	104 Notification of de-energisation (2) If the retailer arranges to de-energise a customer's premises remotely in accordance with the energy laws, the retailer must notify the distributor of the remote de-energisation, and the reason for the de-energisation, as soon as practicable.	104 Notification of de-energisation [Delete], or (2) If the retailer arranges to de-energise a customer's premises remotely in accordance with the energy laws, the retailer must notify the distributor of the remote de-energisation, and the reason for the de-energisation, as soon as practicable upon completion of the de-energisation.	AGL does not agree with the word "arranges". What if the de-energisation is arranged and it never happens? Surely this should just a notification requirement from the MC to the DB, which can be considered by B2B Procedures rather than any requirement in the NERR. This should be redrafted or included in the Retail Market Procedures as a simple notification requirements between participants.
59	106A Re-energisation - electricity (1) If, in accordance with the energy laws, the retailer is required to arrange for the re-energisation of a customer's electricity supply, the retailer must deal with the requirement in accordance with those energy laws. (2) If the retailer does not arrange the re-energisation of a customer's electricity supply by the distributor, the retailer must notify the distributor that the premises have been re-energised as soon as practicable. (3) A retailer must not arrange re-energisation of a customer's electricity supply by a person other than the distributor if the premises were de-energised by the distributor. (4) If, in accordance with energy laws, the distributor is required to re-energise a customer's electricity supply, the distributor must deal with the requirement in accordance with those energy laws. (5) If the distributor has re-energised a customer's electricity supply, the distributor must notify the retailer that the premises have been re-energised as soon as practicable. (6) A distributor must not re-energise a customer's electricity supply if the premises were de-energised by a retailer unless a retailer requests the distributor to re-energise the premises.	106 Re-energisation (1) If, in accordance with the energy laws, the retailer is required to arrange for the re-energisation of a customer's premises, the retailer and the distributor must deal with the request in accordance with those energy laws. (2) If the retailer does not arrange the re-energisation of a customer's electricity supply by the distributor, the retailer must notify the distributor that the premises have been re-energised as soon as practicable. (3) A retailer must not arrange re-energisation of a customer's electricity supply by a person other than the distributor if the premises were de-energised by the distributor. (4) If, in accordance with energy laws, the distributor is required to re-energise a customer's electricity supply, the distributor must deal with the requirement in accordance with those energy laws. (5) If the distributor has re-energised a customer's electricity supply, the distributor must notify the retailer that the premises have been re-energised as soon as practicable. (6) A distributor must not re-energise a customer's electricity supply if the premises were de-energised by a retailer unless a retailer requests the distributor to re-energise the premises. Note: This rule is a civil penalty provision for the purposes of the Law. (See the National Regulations, clause 6 and Schedule 1.)	This section is generally awkwardly drafted. Also, is the intention that this section remain a civil penalty provision? In any event, the detail of this section seems to refer to simple notification requirements between parties and rights to raise service orders, which should clearly be outlined in the Retail Market Procedures rather than the NERR. AGL suggests leaving this section as it is and putting the detail of reenergisation in the Procedures, where it makes much more sense.
60	120 When distributor must not de-energise premises (1) Restrictions on de-energisation Despite any other provisions of this Division but subject to subrules (2), (3) and (4), a distributor must not de-energise a customer's premises:	120A When metering coordinator must not remotely de-energise premises (1) Restrictions on remote de-energisation Despite any other provisions of this Division, a metering coordinator must not de-energise a customer's premises:	AGL queries what the MCs obligations in respect of Rule 120 (a), (d), and (e) are for remote deenergisation? The retailer cannot directly control these occurrences and liability for remote de-energisation by the MC should site with the MC or MDP rather than the retailer.

	<p>(a) where the premises are registered under Part 7 as having life support equipment; or</p> <p>(b) where the customer has made a complaint, directly related to the reason for the proposed de-energisation, to the distributor under the distributor's standard complaints and dispute resolution procedures, and the complaint remains unresolved; or</p> <p>(c) where the customer has made a complaint, directly related to the reason for the proposed de-energisation, to the energy ombudsman and the complaint remains unresolved; or</p> <p>(d) where the customer's premises are to be de-energised under rule 111—during an extreme weather event; or</p> <p>(e) during a protected period.</p>	<p>(a) where the premises are registered under Part 7 as having life support equipment; or</p> <p>(b) where the customer's premises are to be de-energised under rule 111—during an extreme weather event; or</p> <p>(c) during a protected period.</p>	<p>There is no way that the retailer can retain liability for this as it is not within their compliance control.</p>
61	<p>124 Retailer obligations</p> <p>(1) Life support equipment</p>		<p>The current life support framework uses the retailer and distributor as a redundancy to ensure that disconnection will not occur if either party has a customer listed as being on life support.</p> <p>If retailers are directly disconnecting through the MC, then this redundancy in the distributor systems disappears. The Rules should consider this issue.</p>
62	<p>Part 10 Retail market performance reports</p>		<p>Will reporting frameworks need to be changed as a result of this obligation? Will MCs have any reporting obligations under the NERR.</p>
63	<p>5.2 What is not covered by this contract?</p> <p>This contract does not cover the physical connection of your premises to the distribution system, including the maintenance of that connection and the supply of energy to your premises and, where we sell you gas, provision of metering equipment. This is the role of your distributor under a separate contract called a customer connection contract.</p>	<p>This contract does not cover the physical connection of your premises to the distribution system, including metering equipment and the maintenance of that connection and the supply of energy to your premises. This is the role of your distributor under a separate contract called a customer connection contract.</p>	<p>The changes to the standard connection contract purport to cover the electricity metering obligations.</p> <p>However, AGL considers that lots missing. This needs to be reworked.</p>
64	<p>9.2 Calculating the bill</p> <p>Bills we send to you ('your bills') will be calculated on:</p> <p>(a) the amount of energy consumed at your premises during the billing cycle (using information obtained from reading your meter or otherwise in accordance with the Rules); and</p> <p>(b) the amount of fees and charges for any other services provided under this contract during the billing cycle; and</p> <p>(c) the charges payable for services provided by your distributor, including connection charges if you have asked for a new connection</p>	<p>9.2 Calculating the bill</p> <p>Bills we send to you ('your bills') will be calculated on:</p> <p>(a) the amount of energy consumed at your premises during the billing cycle (using information obtained from reading your meter or otherwise in accordance with the Rules); and</p> <p>(b) the amount of fees and charges (including charges relating to metering services) for any other services provided under this contract during the billing cycle; and</p>	<p>AGL suggests that there should probably include a clear right to charge for metering charges, or "services provided by your metering coordinator or responsible person".</p>

	or connection alteration and have not made alternative arrangements with your distributor.	(c) the charges payable for services provided by your distributor, including connection charges if you have asked for a new connection or connection alteration and have not made alternative arrangements with your distributor.	
65	<p>DEEMED STANDARD CONNECTION CONTRACTS</p> <p>10 INTERRUPTION TO SUPPLY</p> <p>10.1 Distributor may interrupt supply We may interrupt the supply of energy to your premises where permitted under the energy laws, including for a planned interruption or where there is an unplanned interruption or in accordance with the conditions of any applicable tariff or under a contract with your retailer.</p> <p>10.2 Planned interruptions (maintenance, repair, etc)</p> <p>(a) We may make planned interruptions to the supply of energy to the premises under the Rules for the following purposes:</p> <p>(i) for the maintenance, repair or augmentation of the transmission system or the distribution system, including maintenance of metering equipment; or</p> <p>(ii) for the installation of a new connection or a connection alteration to another customer.</p> <p>(b) If your energy supply will be affected by a planned interruption, we will give you at least 4 business days notice by mail, letterbox drop, press advertisement or other appropriate means.</p>		Retailers will need a similar right to interrupt supply to hang a meter in their standard retail contract if this is no longer applicable to electricity installations.