SP AusNet Submission re Metrology Harmonisation *Rules* Changes

SP AusNet recognises that Chapter 7 of the Rules forms the fundamental basis for metrology arrangements for the market. It was because of this importance of Chapter 7 and its impact on our business, that SP AusNet was an active member of the Metrology Reference Group (MRG) which was established by NEMMCO to provide a forum for the consideration of NEMMCO's drafted changes to the *Rules* (and *Metrology procedure*). It is also the reason why SP AusNet has made this comprehensive submission on the Metrology Harmonisation Rules Changes.

The MRG had a strong influence on the content and wording of these Rules changes however it was a "reference" group only, and whilst every effort was made by NEMMCO to achieve a consensus with respect to the content, extent and wording of the Rules changes, the decision was ultimately NEMMCO's. Further, SP AusNet have had more time since the MRG was actively involved to consider possible impacts and wording details of the Rules changes. Hence this submission contains a number a matters which were previously raised within the MRG drafting process but ultimately not accepted by NEMMCO, and a number of matters not put to the MRG.

SP AusNet Item 1 within Section 4 of this Submission (against Editorial Note 6) points out that there were a number of issues and comments on aspects of Chapter 7 raised by the industry members of the MRG which were decreed by NEMMCO to be outside the scope of the Rules changes being considered in the current process. The MRG industry members agree that these be added to an Issues List to be considered in later Rules changes.

However, as the AEMC consultation papers include neither this Issues List, nor any recognition that future Chapter 7 Rules changes are envisaged, SP AusNet has taken what we consider the prudent course of including in our submission at least the matters on the Issues List which SP AusNet consider are of high importance.

The further significant change of situation with respect to metrology matters since the MRG was involved, and generally since the Metrology Harmonisation Rules Changes were completed and submitted to AEMC, is the release of the Victorian Jurisdictional study into adding to the Victorian regulated interval meter rollout advanced features, including remote reading and other remote capabilities.

This study showed that adding these advance features resulted in a positive benefit and hence the Victorian Jurisdiction has decided to take legislative action to ensure that an Advance Metering Infrastructure (AMI) is put in place by industry. The Victorian Jurisdiction is currently leading a process for establishing, in conjunction with industry, the technical and process details of this AMI.

SP AusNet have detailed in Section 3 below a number of issues associated with potential inconsistencies between the New Rules as drafted, and as being consulted on, and the emerging details of the technical and "operational" basis of the AMI in Victoria. We have made the point in Section 3 that the Victorian Jurisdiction should take the necessary actions to ensure the New *Rules* as finally put into place at the end of this current consultation process reflect the AMI arrangements. SP AusNet recognise however that this could put the timetable for finalisation at risk and potentially result in there being no alternative to the derogations which expire at the end of 2006.

SP AusNet concede that there may need to be an acceptance of a "transitional" New *Rules* which is recognised as being less than consistent with the AMI arrangements, on the basis that a subsequent *Rules* change in 2007 will provide the specific *Rules* support for the AMI.

SP AusNet would be pleased to discuss this submission with the AEMC and/or be involved in Working Groups or Public Hearings if the AEMC consider these necessary.

1 Terminology in SP AusNet Submission

SP AusNet comments have used generally accepted terminology and abbreviations/acronyms in lieu of *Rules* wording:

AMI	=	the Victorian Jurisdictional initiative to rollout an Advanced Metering Infrastructure (AMI)
ASP	=	Authorised Service Provider
Current *Rules*	=	the *Rules* currently in place
FRMP	=	Financially Responsible Market Participant
LNSP	=	Local Network Service Provider
MDA	=	a service provider accredited by NEMMCO to carry out meter data roles on NEMMCO's behalf as NEMMCO's agent
MHP	=	Metrology Harmonisation Project
MRG	=	Metrology Reference Group the group of industry persons utilised by NEMMCO as a review and discussion forum for NEMMCO's drafted changes to the *Rules* (and *Metrology procedure*). Refer further comments above.
New *Rules*	=	the *Rules* as modified by the Metrology Harmonisation *Rules* Changes
Retailer	=	Market Participant (although generally the SP AusNet comments will be applicable to all relevant Market Participants eg Generators)
RP	=	Responsible Person
SLR	=	the Service Level Requirements which establish the service levels required form *metering provider*s to enable them to be accredited and to fulfil their roles in meeting the requirements of these *Rules*
Type 4A Meter	=	a Type 4 meter meeting the requirements of clause 7.11(aa)(4) ie daily delivery capability and actual data to support all settlements
Type 4B Meter	=	a Type 4 meter meeting the requirements of clause 7.11(aa)(5) ie daily delivery not required and forward estimates to support some settlements

In instances where SP AusNet have suggested specific wording changes, we have used ~~strikethrough~~ to designate removed wording and yellow highlighting for additional words.

2 Transitional arrangements

SP AusNet assess that there are a number of metrology documents which must be revised or established in association with the New *Rules*, and which must become effective on the date the New *Rules* become effective.

2.1 *Metrology procedure* Revision

Clause 7.3.2A(a) makes some arrangements for when the initial national *Metrology procedure* will come into effect; this will be when the New *Rules* come into effect. This assumes of course that the *Metrology procedure* consultation is complete and that there are no changes likely to require system changes and hence implementation time for Participants. The proposal being considered for the inclusion of Queensland specific metrology arrangements into the initial national *Metrology procedure* could put this strategy at risk.

2.2 Referenced Changes in the New *Rules*

There are a number of matters raised in the New *Rules* which commit NEMMCO/industry to produce documentation changes or new documentation. This must be established and come into effect co-incident with this version of the *Rules* or transition arrangements presumably need to detailed in the *Rules* to cover any documentation gap. The documentation listed within the New *Rules* includes:

a.	*Metrology procedure*	specific arrangements for replacement to metering installation before transfer. Unless this is established current industry practice of meter change before transfer will not be allowed	7.3.4 (ab)
b.	*Metrology procedure*	restriction of changes by *FRMP* of Type 5,6,7 to Type 4	7.3.4(aa)

Does any Jurisdiction want to take up this option by submitting a Jurisdictional Direction?

c. NEMMCO Guideline — clarification of how the National Measurement Act applies to metering installations. 7.3.2a(e) Are these in place?

d. *Metrology procedure* — refer comments on clause 7.3.4(ac) in which SP AusNet suggest a definition is required in the *Metrology procedure* re the RP notice period required before a meter change is made before transfer

e. *Metrology procedure* or other Procedure

- rules for timeframes for delivery of data for settlements from various meter types 7.11.(a)(5)(B); 7.11.(aa)(2)

- rules for performance standards for energy data from various meter types 7.11.(a)(5)(D); 7.11.(aa)(3)

These requirements for Procedure details are further stated in clause 7.11(ab)(2) &(3)

- rules for volume limits where a Type 4B meter can be used ie the crossover volume limit

SP AusNet consider that this detail is critical to understanding the detailed technical impact of the clauses in section 7.11 and also important in defining the performance of metering systems including the "new" type 4B as will be rolled out through the Victorian Jurisdictional AMI

2.3 Jurisdictional Document Changes

SP AusNet has not done the relevant review, but there are likely to be Jurisdictional documents which will require revision as they will become inconsistent with the New *Rules*, if for no other reason than any specific clause reference to the Current *Rules* could be incorrect. Eg the Electricity Customer Metering Code (ECMC) in Victoria.

SP AusNet notes for example that the ECMC only allows the *FRMP* to change meters to a *Remote acquisition* meter whereas various provisions within the New *Rules* are intended to allow this change to be initiated by the Pending *FRMP* (refer SP AusNet suggested definition in Item 14)

2.4 *Metering provider* SLRs

Again SP AusNet has not done the relevant review, but there are likely to be aspects of the SLRs which will require revision as they will become inconsistent with the New *Rules*; this includes not only the existing SLRs *metering provider*s Category D (ie data service providers) but also the SLR for *metering provider*s Category B (meter providers, installers and maintainers) which are currently being drafted by NEMMCO following extensive industry comments on the first round of consultation on an earlier draft.

2.5 CATS Procedures

There are likely to be significant changes to the CATS Procedures flowing from the detailed considerations with respect to the Victorian AMI meter rollout which are discussed in Section 3 below.

However putting these detailed considerations aside, there is at least one change to the CATS Procedure required with respect to identifying those NMIs with the new sub-type of meter (type 4B) to enable NEMMCO to understand data delivery expectations and to enable retailers to use MSATS as the basis of different billing expectations required for type 4A compared with type 4B

SP AusNet also point to the proposed changes to the transfer process now before the industry working groups with respect to overcoming the issues associated with meter churn before transfer as discussed in this submission Item 14

Changes to any of these documents will generally require extensive consultation and hence there may be risks of their not being established in time, particularly if details of the changes to the documents are made late in the New *Rules* changes consultation process.

2.5 Jurisdictional Policy Directives

Further it is unclear whether formal Jurisdictional Policy Directives must be established to ensure that matters nominated in the New *Rules* as requiring these Jurisdictional Policy Directives are formally established under the New *Rules* eg Jurisdictional Policy Directives for the values of "x" and "y" for type 5 and type 6 metering installations.

3 Victorian Jurisdictional arrangements for Victorian Enhanced Metering Infrastructure initiative.

SP AusNet are unclear how the various governance and regulatory arrangements are to be established to support the Victorian Jurisdictional mass rollout of interval meters with enhanced infrastructure including remote reading. The New *Rules* recognises, and defines albeit at a high level, the type of meters envisaged for the AMI. These are the Type 4B meters as defined in 7.11(aa)(5). However the emerging technical details of the AMI meters and the envisaged roles and responsibilities are not necessarily aligned with the concepts which are the basis of the *Rules* changes. The aspects of non alignment identified by SP AusNet are:

3.1 Performance and technical requirements

In a number of aspects the performance and technical features of the AMI meters would appear likely to be better than those assumed in the New *Rules*. In industry workshops aiming to establish the specifications of the AMI metering installations there has been a strong push for metering data to be available to match settlement timeframes. One view could hence be that this is not an issue as the New *Rules* are setting minimum performance standards. However, the performance standards for AMI are such that they are likely to be capable of providing at least some of the performance levels of Type 4A (eg meeting settlements timeframes) and hence are "blurring" the distinction. The Victorian AMI is hence likely to be more like a third sub-category of type 4 metering installation. This mismatch, if left in place in the New *Rules*, would result in anomalies between the obligations and service provision requirements for RPs and *metering provider*s to comply with the New *Rules*, and, the obligations and service provision expected to be met by RPs and *metering provider*s operating in Victoria.

SP AusNet consider that this is an undesirable outcome. SP AusNet in this submission has generally not suggested changes to the New *Rules* to align them with the currently expected Victorian AMI, particularly as the details of the AMI are not yet finalised, ie SP AusNet has generally commented on the obligations for type 4B based on the "definitions" in 7.11(a)(4) and other New *Rules* clauses. However, SP AusNet recommend that the AEMC and the Victorian Jurisdiction agree on a program for ensuring that the New *Rules* that ultimately are established incorporate type 4B metering installation functionality more in line with the Victorian AMI.

3.2 Additional functionality

The Victorian AMI metering installation functionality is likely to include a range of obligatory features not current specified or expected in market metering installations. These could include:

- Two way communications
- Automated meter setup
- Load switching capability
- Ports for interconnection to external load management and/or display devices
- Capability for integrating gas meter or water meter reading

- Meter alarms handling
- Export metering

Each of these features will dictate certain technical requirements of the AMI metering installations and place obligations on RPs and metering service providers with respect to the operation of these features. Some of these will be relatively closely integrated with the performance of the "base level" meter and service provision, and some may just provide opportunity for additional capabilities to be added.

SP AusNet are unclear where these technical requirements and service obligations are to be specified and documented, and how the associated obligations are to be applied. The *Rules* make specific reference to technical requirements and service obligations and hence SP AusNet assess that the understanding of where, and when, these are to documented must be done in conjunction with the New *Rules* consultation process and outcome must be co-ordinated with the effective date of the New *Rules.*

SP AusNet would be disappointed however if this documentation were not done in a manner that is consistent with the JJR review's and the MHP's thrust to achieve:
- single nationally consistent documentation, and
- nationally consistent standards wherever possible.

SP AusNet also note that these technical requirements and service obligations are likely to require revisions to the obligations with respect to standing data details, and hence will require consideration and consultation with respect to changes to the CATS Procedures.

3b Responsibilities: Retailers, LNSPs, RPs, NEMMCO

Although it is far from clear as to how responsibilities and roles will be allocated within the Victorian Jurisdictional AMI program, it would appear that there is a strong possibility that the retailers will have the choice of RP for the AMI metering installations; but the LNSP is likely to be the default provider of metering services. Whatever the details of how this is achieved, it will almost certainly challenge the fundamental responsibility and roles allocation as established in the Current *Rules* and New *Rules*.

The key features of the current arrangement for type 4 installations are:

- RP is responsible to the meter at site and up to the communications interface

- RP contracts a *Metering provider* to install, maintain and test the meter. Note: has <u>direct</u> relationship and hence can exercise contractual control to ensure *metering provider* meets the RP's obligations

If in the Victorian AMI model:

- the *FRMP* is the RP but the LNSP contracts the *Metering provider*s (meter provision and meter data), then the *FRMP* as RP will not have a *Rules* compliant relationship with the meter provision *metering provider* and will only be able to fulfil their obligations working through the LNSP, or

- the *FRMP* is the RP and contracts the *Metering provider*s (meter provision and meter data) then the relationships will be notionally *Rules* compliant but the LNSP's role is then difficult to understand unless the RP is "forced" to contract the LNSP "preferred" providers. This would leave the RP not much better off in being able to control those contractors and fulfil the *Rules* obligations.

Refer also comments on clause 7.3.6(ac) in Item 19.

SP AusNet would hope that the Victorian Jurisdiction recognise these potential anomalies and that they work directly with AEMC, and through the industry working groups established to progress AMI, to ensure that the approach they implement for AMI is reflected in the New *Rules* as finally put into place at the end of this current consultation process.

4 SP AusNet Comments with Respect to Specific *Rules* Clauses

The remainder of this document details SP AusNet's comments against specific clausea of the New Rules. Each comment is identified by an Item Number.

ATTACHMENT B
Based on a clean copy of the Rules, issued by MCE, in force on 1 July 2005
Proposed Rule changes for Project 1 "metrology procedure" and LNSP derogations

7. Metering{ XE "metering" }

Editorial Notes:

1. The changes to Chapter 7 as proposed in this version have been designed to meet the relevant recommendations contained in the Joint Jurisdictional Regulators Review, dated October 2004 (JJR recommendations).

2. The changes presented in this version represent changes to the content, layout and structure of Chapter 7 that relate to Project 1 only. The changes are made:

   a. to allow the current jurisdictional metrology procedures (5 different documents) and the Type 1 to 4 metrology procedures (4 different documents) to be recognised as a single document, and

   b. to allow the current jurisdictional derogations (as found in Chapter 9 of the Rules) for the LNSP to be the responsible person under certain conditions to be replaced by permanent provisions in Chapter 7 which align to the recommendations arising from the Joint Jurisdictional Regulators review dated October 2004.

3. The major changes in regard to the single NEM metrology procedure are associated with the replacement of the Metrology Coordinator (clause 7.2.1A) with NEMMCO (clause 7.2.1B), and the transfer of paragraphs specific to the metrology procedure from clause 7.3.1 to clause 7.3.2A, including appropriate adjustments.

4. The major changes in regard to the establishment of the LNSP as the exclusive responsible person for metering installations types 5,6,7 are found in changes to the election process (clause 7.2.0, 7.2.2, 7.2.3(aa)), the additional responsibilities assigned in clause 7.2.5 and 7.3.4, and the changes to data delivery performance standards (clauses 7.11(a) and 7.11(aa)). These changes should allow the current derogations in Chapter 9 to fall away in December 2006 without the need for renewal of the derogations.

5. Other changes required by the Joint Jurisdictional Regulators recommendations regarding requirements for meter reversion and interval [illegible]ding (clauses 7.2.5), and reports and reviews (clause 7.13) have been included in [illegible]apter 7 changes.

6. Changes to Chapter 7 that are required to improve the content, layout or structure of the Chapter have been deferred as issues, and will be considered in Project 3 "Restructure of Chapter 7" (that is, after the changes to Chapter 7 have been made for Projects 1 and 2). These issues have been formally registered by NEMMCO. A consolidated summary of the issues will be provided as part of the Project 1 consultation process.

7. The plural term 'metrology procedures' may, in the future, be used to represent a family of procedures. For Project 1, the term 'metrology procedure' has been limited to a single document.

8. For assessment, the relevant clause in the Chapter 9 that are to be deleted as a consequence of the proposed changes to Chapter 7 are referenced after clause 7.13 and before the Glossary terms.

9. For ease of review, the new, altered and deleted Glossary terms that have been introduced by this version of Chapter 7 have been located after clause 7.13 and before Schedule 7.1.]

2

1

Item 1 Editorial Note 6

SP AusNet cannot find as part of the AEMC consultation support documentation this "consolidated summary of the issues" which Editorial Note 6 suggests are changes required to Chapter 7 and which will be done later.

SP AusNet has made comment on all matters where we assess the *Rules* changes do not provide clarity or are not consistent with current or envisaged practice. We know some of these matters are on the industry/NEMMCO Metrology Issues Register. We recognise that some of these matters raised may therefore be on the "consolidated summary of the issues" mentioned in Editorial Note 6 but without the list being formally part of the consultation we have considered it prudent to included all matters.

Item 2 Editorial Note 6

A number of the items we have raised are matters where the *Rules* as drafted for this consultation are not consistent with current practice or are literally not definable and/or implementable. The term "to improve" is not strong enough for these items; "correct" is more consistent with required action.

P2

No comments

ATTACHMENT B
Based on a clean copy of the Rules, issued by MCE, in force on 1 July 2005
Proposed Rule changes for Project 1 "metrology procedure" and LNSP derogations

7.1.4 Obligations of Market Participants{ XE "obligations" } to establish metering installations{ XE "metering installation" }

(a) Before participating in the *market* in respect of a *connection point*, a *Market Participant* must ensure that:

(1) the *connection point* has a *metering installation* and that the *metering installation* is registered with *NEMMCO*;

[Clauses (7.1.4(a) and 7.1.4(a)(1)) have been revised in accordance with the outcomes of the legal review]

(2) it has sought an offer and if accepted, entered into an agreement under clause 7.2.2 or it has complied with clause 7.2.3 in relation to that *metering installation* and has advised the *Local Network Service Provider* accordingly; and

(3) prior to registration a *NMI* has been obtained by the *responsible person* for the *metering installation.*

(b) *NEMMCO* may refuse to permit a *Market Participant* to participate in the *market* in respect of any *connection point* in relation to which that *Market Participant* is not in compliance with its obligations under clause 7.1.4(a).

7.2 Responsibility for Metering Installation

7.2.0 Responsible Person

Each *Local Network Service Provider* is ~~responsible~~ the *responsible person* for the ~~provision of~~ *metering installations* ~~to Market Participants~~ connected to, or ~~proposing~~ proposed to be connected to, the *Local Network Service Provider's* network ~~in its local area and the installation and maintenance of those metering installations unless otherwise elected by the~~ unless a *Market Participant* elects to be the *responsible person* in respect of any type 1, type 2, type 3 or type 4 *metering installation* in accordance with clause 7.2.3(aa).

[Clause 7.2.0 has been relocated from clause 7.2.2(aa) to improve the understanding of the choice available to the Market Participant and the LNSP. The following changes to the original text have been made: (1) the reference to 'responsible for the provision of' has been replaced by direct reference to the *responsible person* to recognise that this clause now has the status of a 'lead-in' clause and the previous relationship with clause 7.2.1(a) has been altered, and (2) additional text has been added to the end of the paragraph to provide a method of controlling the range of metering installations available to both the Market Participant and the LNSP (that is, the additional text defines that the Market Participant can elect to be the responsible person in limited circumstances, as specified in clause 7.2.3(aa))]

3

Item 3 Clause 7.2.0

Whilst SP AusNet recognise that, although significantly reworded, the fundamental meaning of this Clause has not changed, SP AusNet have concerns re its potentially misleading nature in that it implies that the LNSP is the "default" RP for all meter types.

This would imply that if a Retailer approached a LNSP for a connection with a requirement for a Type 1-4 meter but did not nominate an RP, that the LNSP must nominate themselves as the RP. SP AusNet does not consider that should be the case. SP AusNet would push the request back to the Retailer in this case, but if ultimately the customer needed supply then SP AusNet might create the NMI with the *FRMP* as the RP.

The LNSP through error may accepted a connection request and established a NMI without a *FRMP* nominated RP however even then the NMI could not enter the market as the RP field is a mandatory one in MSATS.

SP AusNet suggest rewording:

7.2.0 Responsible Person

Each *Local Network Service Provider* is the *responsible person* for:

(a) any type 5, type 6, or type 7 *metering installations* connected to, or proposed to be connected to, the *Local Network Service Provider's* network

(b) any type 1, type 2, type 3 or type 4 *metering installation* connected to, or proposed to be connected to, the *Local Network Service Provider's* network where the *Market Participant* has accepted the *Local Network Service Provider's* offer made in accordance with clause 7.2.2 (a)

ATTACHMENT B
Based on a clean copy of the Rules, issued by MCE, in force on 1 July 2005
Proposed Rule changes for Project 1 "metrology procedure" and LNSP derogations

7.2.1 Responsible person's responsibilities

(a) The ~~person who has responsibility~~ *responsible person* is responsible for the provision, installation and maintenance of a *metering installation* ~~is the *responsible person*.~~ in accordance with Chapter 7 and the *metrology procedure*;

[This clause has been altered to align with the relocation of clause 7.2.2(aa) to its new position as clause 7.2.0, and the subsequent variation to clause 7.2.0. The original paragraph has been preserved by way of its inclusion in the existing Glossary term 'responsible person', which remains unaltered. Please note that the term 'metering installation' infers reference to the range of Metering Provider services (including metering data services) that are required for types 5, 6,7 metering installations. The diagram in Schedule 7.1 has been modified to convey this underlying meaning. The expression "in accordance with Chapter 7 and the metrology procedure" has been transferred from clause 7.2.2(b)(1) to allow that clause to be deleted]

(b) *NEMMCO* must establish guidelines, in accordance with the *Rules consultation procedures*, on the role of the *responsible person* as required by the *Rules*.

(c) ~~If a *Market Participant* elects not to request an offer from or does not accept the offer of the *Local Network Service Provider* for the provision of a *metering installation* under clause 7.2.2, or if an agreement under clause 7.2.2 is terminated due to breach by the *Market Participant*, the *Market Participant*~~ The *responsible person* must:

[Clause 7.2.1(c) was transferred from clause 7.2.3(a). The changes are consequential to the relocation]

(1) ~~will be the~~ undertake the duties of the *responsible person* for that *metering installation*, in accordance with ~~this~~ Chapter 7 and the ~~applicable~~ *metrology procedure*;

[Clause 7.2.1(c)(1) was clause 7.2.3(a)(1a). The changes are partly consequential to the relocation, partly as an outcome of legal review and partly a consequence to the changes in the metrology procedure arrangements]

(2) ~~will have responsibility for arranging for the provision, installation and maintenance of the relevant *metering installation* and for this purpose, must~~ engage a *Metering Provider(s)* ~~registered by *NEMMCO* for~~ to conduct the relevant work or, where the ~~*Market Participant*~~ *responsible person* is required to do so ~~in accordance with a relevant~~ by the *metrology procedure*, allow another person to engage a *Metering Provider* ~~registered by *NEMMCO*~~ to install the relevant *metering installation*;

4

[Clause 7.2.1(c)(2) was proposed for two locations: originally in clause 7.2.3(a)(1) and proposed for clause 7.2.2(c)(1). This new

Item 4 Clause 7.2.1(c)(2) use of Authorised Service Providers

Refer SP AusNet submission on Schedule S7.4.2 and S7.4.5 with respect to more general comments on the recognition of ASPs and the definition of their position re accreditation etc.

SP AusNet understanding is this Clause 7.2.1(c)(2) was "extended" to recognise that there was an abnormality or special case in some jurisdictions where *metering providers* (ASPs) could be appointed by other than the RP. If the concept of ASPs is going to be recognised in the *Rules* by virtue of Schedule S7.4.2 and S7.4.5 then SP AusNet consider that this clause should more specifically recognise that ASPs are the exception and state this clearly.

SP AusNet suggested rewording:

The *responsible person* must: …..
engage a *Metering provider(s)* to conduct the relevant work or, where the *responsible person* is required to do so by the *metrology procedure*, allow another person to engage an ASP to install the relevant *metering installation*;

location removes the duplication and consolidates the responsible person duties in the one location. The changes to this clause are partly consequential to the relocation and partly as an outcome of legal review]

(3) enter into an agreement with ~~the~~ a *Metering Provider~~(s)~~* ~~which~~ that includes the terms and conditions for the provision, installation and maintenance of the *metering installation* by the *Metering Provider* or, where a ~~*Market Participant*~~ *responsible person* allows another person to engage a *Metering Provider* in accordance with clause ~~7.2.3(a)(1)~~ 7.2.1(c)(3) ~~must~~ enter into an agreement with a *Metering Provider* ~~in relation to the terms and conditions~~ for the maintenance of the *metering installation;* and

5

6

[Clause 7.2.1(c)(3) was proposed for two locations: originally in clause 7.2.3(a)(2) and proposed for clause 7.2.2(c)(2). This new location removes the duplication and consolidates the responsible person duties in the one location. The changes are partly consequential to the relocation and partly as an outcome of legal review]

(4) provide *NEMMCO* with the relevant details of the *metering installation* ~~in accordance with~~ contained in schedule 7.5 within 10 *business days* of entering into an agreement with the *Metering Provider~~(s)~~*.:

[Clause 7.2.1(c)(4) was proposed for two locations: originally in clause 7.2.3(a)(3) and proposed for clause 7.2.2(c)(4). This new location removes the duplication and consolidates the responsible person duties in the one location. The changes are an outcome of legal review]

(d) ~~For the avoidance of doubt, n~~Nothing in clause ~~7.2.3(a)~~ 7.2.1(c) prevents a ~~*Market Participant*~~ *responsible person* electing to terminate its clause 7.2.1(c)(3) agreement with a *Metering Provider~~(s)~~* after installation of a *meter* and entering into a new agreement with another *Metering Provider* for the maintenance of the *metering installation*.

[Clause 7.2.1(d) was clause 7.2.3(b). This new location consolidates the responsible person duties in the one location. The changes are partly consequential to the relocation and partly as an outcome of legal review]

7.2.1A ~~Responsibility of Metrology Coordinator~~ [Deleted]

(a) [Deleted]

(b) [Deleted]

(c) [Deleted]

(d) [Deleted]

Item 5 7.2.1(c)(3)

As per SP AusNet Item 4, we consider that the wording "a *Metering provider*" should be replaced by "an ASP".

Item 6 7.2.1(c)(3)

If an ASP installs the meter it is obvious that the RP then has to appoint a MP to carry out the ongoing maintenance of the installation; however SP AusNet consider that the other two "aspects" of the installation need to be also specifically covered. The meter needs to be provided by a *Metering provider,* and the installation needs to be tested, including tested into service/commissioned, by a *Metering provider*.

SP AusNet suggested rewording:

….enter into an agreement with a *Metering provider* in relation to the terms and conditions for the provision, testing and maintenance of the *metering installation;* and

Page 6

No comments

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~~*Participant* and must inform the *Market Participant* of~~ and provide the terms and conditions on which the offer is made to the *Market Participant* no later than 15 *business days* after the *Market Participant's* written request to provide the offer is received by the *Local Network Service Provider*;

[Clause (7.2.2(a) has been revised in accordance with the outcomes of the legal review and jurisdictional comment. The drafting of the clause has been changed to improve its presentation. The reference to types 1 to 4 metering installation has been added to improve the understanding of the clause now that a restriction applies to the Market Participant's choice to be the responsible person]

7

(ab) Where a type 5, type 6 or type 7 *metering installation* is, or is to be, installed:

[Clause 7.2.2(ab) has been added to provide the rights available to the distributor in the current derogation in Chapter 9 of the Rules. A separate clause to 7.2.2(a) is required because the LNSP is the exclusive responsible person for these types of metering installations. This clause transfers the main points contained in the relevant part of Chapter 9 of the Rules (note that the Chapter 9 clauses will be deleted as part of this transfer). For example of a relevant clause, please refer to clause 9.9A.2 for Victoria]

(1) the *Market Participant* must request an offer from the *Local Network Service Provider* to act as the *responsible person* for that *metering installation*;

[Clause 7.2.2(ab)(1) is a transfer of a main point contained in the relevant part of Chapter 9 of the Rules (for example, refer to clause 9.9A.2(b)(i) for Victoria)]

(2) no later than 15 *business days* after a *Local Network Service Provider* receives the *Market Participant's* request under clause 7.2.2(ab)(1), the *Local Network Service Provider* must make an offer to the *Market Participant* setting out the terms and conditions on which it will agree to act as the *responsible person*;

[Clause 7.2.2(ab)(2) is a copy of clause 7.2.2(a) suitably modified to enable it to be applied to the type 5, type 6 and type 7 metering installation]

(3) the *Market Participant* may accept the offer, or dispute the offer, in which case the matter will be resolved using the clause 8.2 dispute resolution process;

[Clause 7.2.2(ab)(3) is a transfer of a main point contained in the relevant part of Chapter 9 of the Rules (for example, refer to clause 9.9A.2(b)(ii) for Victoria). The clause has been revised in accordance with the outcome of legal review]

(ac) The terms and conditions of an offer made by the *Local Network Service Provider* under clause 7.2.2(ab) must:

Item 7 7.2.2 (ab)

Whilst SP AusNet recognise that the content of this Clause has been taken largely from the derogation, and hence represents a "soft" change, the wording is a long way off describing the actual processes which are applicable for meter installations which are the responsibility of the LNSP (types 5, 6, 7).

These processes are defined in the B2B Procedures and can be loosely mapped as follows:

7.2.2(ab)(1)
fundamental meaning of current New *Rules* wording: retailer must request an offer from LNSP
actual B2B process: retailer submits a B2B Service Order for connection and meter installation.
could be interpreted as: the Retailer accepting the "standing offer" of the LNSP for the work requested.

7.2.2(ab)((2)
current New *Rules* wording LNSP must make an offer
actual B2B process: LNSP acknowledges work request (indicates reasonable endeavours will be taken to carry out the work) or rejects work for one of a number of defined reasons.
could be interpreted as: LNSP indicates to retailer that work will be carried out for the applicable "standard fee"

7.2.2(ab)((3) Retailer accepts or rejects offer
current New *Rules* wording Retailer accepts or rejects offer
actual B2B process: No directly equivalent step; the Retailer can only dispute the Product Code included in the service order response and Network Bill provided after the event on the basis that it is not consistent with the work requested.

SP AusNet suggest that the clause should be reworded to simply make reference to the B2B Procedure: Service Orders

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(1) be fair and reasonable; and

(2) not unreasonably discriminate, or have the effect of discriminating unreasonably, between *Market Participants*, or between the customers of any *Market Participant*;

[Clause 7.2.2(ac) has been added to provide the rights available to the Market Participant in the current derogation in Chapter 9 of the Rules. For example, refer to clause 9.9A.2(c) for Victoria]

(b) If the *Market Participant* accepts ~~the offer made under~~ a clause 7.2.2(a) or 7.2.2(ab) offer, the *Local Network Service Provider is the responsible person*~~:~~.

[Clause 7.2.2(b) has been revised in accordance with the deletion of clauses 7.2.2(b)(1) and 7.2.2(b)(2)]

~~(1) thereafter has responsibility for the provision, installation and maintenance of that *Market Participant's metering installation*, in accordance with this Chapter 7 and the applicable *metrology procedure*; and~~ [Deleted]

[Clause 7.2.2(b)(1) has been deleted as it has been merged into clause 7.2.1(b). The expression "in accordance with Chapter 7 and the metrology procedure" has been transferred to clause 7.2.1(a)]

~~(2) must provide *NEMMCO* with relevant details of the *metering installation* in accordance with schedule 7.5 within 10 *business days* of acceptance by the *Market Participant* of the offer.~~ [Deleted]

[Clause 7.2.2(b)(2) has been deleted as its intent has been transferred to the newly located clause 7.2.1(c)(4)]

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(c) Where a *Local Network Service Provider* is the *responsible person*, the *Local Network Service Provider* must provide *NEMMCO* with the *metering installation's NMI* within 10 *business days* of a *Market Participant's* acceptance of the *connection agreement* formed under clause 5.3.7.

[Clause 7.2.2(c) has been added to make the requirement in clause 5.3.7(e) transparent now that the LNSP has exclusive responsibility to be the responsible person for certain types of metering installations]

7.2.3 Election by a Market Participant to be the responsible person{ XE "metering" }

(aa) A *Market Participant* may elect to be the *responsible person* for a type 1, type 2, type 3 or type 4 *metering installation*;

[Clause 7.2.3(aa) is a new clause and has been added to define the boundary of opportunity for the Market Participant to elect to be Responsible Person. The Market Participant cannot elect to be the responsible person for type 5, type 6 and type 7 metering installations.

Item 8 7.2.2 (c)

SP AusNet cannot understand the need for this obligation which does not appear to be consistent with other obligations covering NMI provision.

In Victoria the Distribution License requires the NMI to be issued prior to connection.

The Electricity Customer Metering Code states

(2) each ***distributor*** is required to provide to ***NEMMCO*** the ***NMI*** and each item of ***NMI standing data*** in respect of each ***supply point*** for which it is the ***distributor***;

(3) a ***distributor*** must supply the information referred to in sub-paragraph 3.1(a)(2) as soon as practicable and in any event within two ***Victorian business days*** of becoming aware of a change to an item of data;

This has been interpreted as within two days of it being generated for a new connection.

The CATS Procedure states

new LNSP must:

(a) Create a NMI master record for each consumer supplied within its area with the minimum required data for initiation of the appropriate Change Request in MSATS. This must be done within two business days of the minimum required data becoming available.

SP AusNet hence considers that whilst the connection agreement date is nominally a reasonable reference, it is only specifically applicable to larger customers; for most customers who have the default connection agreement, the date the NMI is generated is more meaningfully for a new connection and the wording should be revised to reflect this.

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However, there should be nothing stopping a financially responsible Market Participant from altering a metering installation from a type 5, type 6 or type 7 metering installation to a type 1 to 4 type metering installation if such an alteration is considered to be commercially attractive to the Market Participant, either directly or on behalf of its customer (that was an implied right under the previous version of Chapter 7), and is permitted by a jurisdiction. This right has been conferred transparently on the Market Participant in changes made to clause 7.2.5(g) and clause 7.3.4(a)(1). These changes are consistent with the JJR recommendations 4.2(b) and 4.2(d), including clarification provided by the JJR that the "z" factor is not to be a new variable, but rather it will be specified as "x" for type 5 and "y" for type 6 metering installations. This assignment of the "z" factor to "x" and "y" has the effect of allocating the responsible person for all type 5 and type 6 metering installations to the LNSP. The change is also consistent with the JJR recommendation 4.3 that requires the LNSP to be the responsible person for the type 7 metering installation].

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(ab) If an agreement arising from acceptance of the clause 7.2.2(b) offer is terminated due to breach by the *Market Participant*, the ~~*Market Participant*~~ becomes the *responsible person* for that *metering installation* upon termination of that agreement:

[Clause 7.2.3(ab) has been formed as a new clause (by a split from clause 7.2.3(a) below) to enable it to work along side clause 7.2.3(aa) above. The need to manage this type of 'breach' only arises under the exclusive LNSP responsible person condition, as represented by clause 7.2.2(b)]

~~(a) If a *Market Participant* elects not to request an offer from or does not accept the offer of the *Local Network Service Provider* for the provision of a *metering installation* under clause 7.2.2, or if an agreement under clause 7.2.2 is terminated due to breach by the *Market Participant*, the *Market Participant*.~~ [Deleted]

~~(1a) will be the *responsible person* for that *metering installation*, in accordance with this Chapter 7 and the applicable *metrology procedure*;~~ [Deleted]

~~(1) will have responsibility for arranging for the provision, installation and maintenance of the relevant *metering installation* and for this purpose, must engage a *Metering Provider(s)* registered by *NEMMCO* for the relevant work or, where the *Market Participant* is required to do so in accordance with a relevant *metrology procedure*, allow another person to engage a *Metering Provider* registered by *NEMMCO* to install the relevant *metering installation*;~~ [Deleted]

~~(2) must enter into an agreement with the *Metering Provider(s)* which includes the terms and conditions for the provision, installation and maintenance of the *metering installation* by the *Metering Provider* or, where a *Market Participant* allows another person to engage a *Metering*~~

Item 9 7.2.3(aa) Explanatory Note

The statement that there is "nothing stopping a *FRMP* from altering a metering installation from type 5, type 6, type 7 to type 1 to 4" is not entirely true as there are restrictions defined in the New *Rules* 7.3.4(aa), (ab) & (ac) which define the approach .

Refer further SP AusNet comments re these clauses.

Item 10 7.2.3(aa) Explanatory Note

Reference 7.3.4(a)(1) is incorrect and should be 7.3.4(aa),

Item 11 7.2.3 (ab)

The reference in the clause in incorrect and should be 7.2.2(a), re the LNSP making an offer for a type 1-4 installation, rather than 7.2.2(b) which more generally covers the offer acceptance for all meter types, or 7.2.2(ab) re the LNSP making an offer for a type 5-7 installation. If the Retailer breaches the terms of the LNSP standing offer for a type 5-7 installation the LNSP's recourse is to Regulator intervention NOT contractual breach processes.

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No comments

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[Clause (7.2.5(b)) has been revised in accordance with the outcomes of the legal review. "The Rules" has been restored as this reference is broader that Chapter 7 and also embraces Chapter 5 and Chapter 9 - the requested alteration will be resolved in Project 3. "metrology procedures has been added to provide flexibility by allowing some of the requirements for accuracy and testing to be specified in the metrology procedure]

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(ba) provide and maintain the security control of each of its *metering installations* in accordance with clause 7.8.2;

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(bb) ensure that for each of its *metering installations* a *communications link* is installed and maintained to the *telecommunications network* and includes, where required for the connection to that *telecommunications network*, a modem and *isolation* equipment approved under telecommunications regulations;

(bc) provide access to the *metering installation* from a telecommunications network to facilitate the requirement of clause 7.7 and clause 7.12(aa);

(c) **[Deleted]**

(d) provide to *NEMMCO* the information specified in schedule 7.5 for ~~each of its~~ new or modified *metering installations*, or any other time at the request of *NEMMCO*;

[Clause 7.2.5(d) has been modified to provide clarification on its application]

(e) not replace a device that is capable of producing *interval energy data* and is installed within a *metering installation* with a device that only produces *accumulated energy data* within that *metering installation* unless the *metrology procedure* permits the replacement to take place;

[Clause 7.2.5(e) has been added in accordance with the JJR recommendation 7.1]

(f) ensure, for any type 5 *metering installation* where the annual flow of electricity through the *connection point* is greater than the *type 5 accumulation boundary*, that the *metering data* is extracted or emanates from the *data logger* as *interval energy data*;

[Clause 7.2.5(f) has been added in accordance with JJR recommendations 7.2, 7.3 and 7.4.]

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(g) subject to clause 7.2.5(e) and unless otherwise recorded in the *metrology procedure*, allow the replacement of a *metering installation* for which that person is responsible with another *metering installation* if notice of the change is received from the *financially responsible Market Participant*; and

[Clause 7.2.5(g) has been included as part of the changes that allocate exclusive responsibility for the metering installation to the LNSP. The clause is consistent with JJR recommendation 4.8. It has been added to ensure that Market

Item 12 7.2.5ba security controls

The responsibility for providing and maintaining security controls for metering installations is allocated to the *metering provider* in clause 7.4.1(b) and hence this clause should be for the RP to "ensure provision and maintenance" rather than the actual "provide and maintain".

SP AusNet considers that it is important to ensure that the RP responsibilities are clearly and specifically defined.

Item 13 Terminology re "components" of metering installation and data process and impact on allocation of responsibilities

SP AusNet is concerned that the New *Rules* do not seek to remove the obscure and less than intuitive way in which the various "components" of the meter installation and data process are notated and used to define roles and responsibilities. The current less than ideal approach is a remnant of the minimalist Code (now *Rules*) change approach which was used to establish the necessary relationships and responsibilities for FRC. Rather than clearly re-define the various process elements and roles completely, the decision at the time was to "stretch and interpret" the then current process elements and roles to fit those required for FRC. This has left the *Rules* very difficult to interpret without an understanding of this background.

This clause 7.2.5(bb) is a prime example of the "stretch" in wording introduce by FRC. For a manually read meter the following interpretation is required to understand the real meaning of this clause for this case.

> Ensure for each of its metering installations that data is read and loaded into a metering data base, and that the database has access to a communications path to the NEMMCO metering database.

The "stretches of meaning" in the actual *Rules* wording to uncover this real meaning include:

- the "metering installation" includes the *metering provider*'s metering data base – a less than intuitive approach and one which embraces two different categories of service providers
- the "communication link" in this case is the manual meter reading system & process
- the "telecommunications network" is the NEMMCO MSATS Hub and related data channels

Whilst some of these issues with terminology are largely one of readability, there are aspects where the lack of clarity can make interpretation of responsibilities difficult. SP AusNet consider that this is the case with respect to details of the "new" definitions of type 4A and type 4B meters. Refer SP AusNet comments on clause 7.11.

Item 14 7.2.5 (g) and also 7.3.4 (aa), (ab) & (ac)

SP AusNet recognises that, unless prevented by Jurisdictional policy,

(i) The *FRMP* for a site (ie current MSATS nominated Retailer) must be able to arrange for:
  (a) the "upgrading" of a metering installation from type 5 or type 6 (where the LNSP is the RP) to a type 4A, 4B or "better" metering installation (where the RP role is "contestable").
  (b) the change of a contestable meter

(ii) The industry expectation is that a "pending" *FRMP* for a site must also have the same ability, both (a) and (b) above, before the retailer transfer date. Although this has a number of issues (and SP AusNet consider that some of these are not covered by the New *Rules* as discussed elsewhere in this submission), we pragmatically recognise that this is a current industry standard practise.

SP AusNet consider that the clauses in the *Rules* need to support these requirements and ensure there are no "regulatory" barriers, whilst protecting the "rights" of all involved parties.

> Note: the *Rules* definition of "*financially responsible*" as used in the term *FRMP* is a little uncertain:
>
> In relation to any *market connection point*, a term which is used to describe the *Market Participant* which has either:
> 1. classified the *connection point* as one of its *market loads*;
> …….

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

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

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

- *FRMP* can arrange for changes including "upgrade" from type 5,6,7 to type 1-4, unless prevented by Jurisdictional policy
- *Pending FRMP* cannot arrange for changes including "upgrade" from type 5,6,7 to type 1-4 (ie must wait for transfer) unless MSATS Procedures specify arrangements
- Notice must be provided by *FRMP* or *pending FRMP* to current RP (unless of course *FRMP* is current RP)

SP AusNet analysis of the existing clauses is:

7.2.5(g) states the RP, if they have received notice from the *FRMP*, must allow the *FRMP* to arrange for another RP to change the meter. ie Clause 7.2.5(g) does not cover Scenario (ii) above as it is specifically limited to the *FRMP* not the *pending FRMP*

SP AusNet also have an issue with the wording "allow" as it is unclear what the existing RP would do to "not allow" the change !

7.3.4 (aa) states the *FRMP* can arrange change to the meter from type 5,6,7 to type 1-4; again clause is specifically limited to the *FRMP* not the *pending FRMP*. Further this clause does not cover type 1-4 to type 1-4

ie 7.2.5(g) and 7.3.4 (aa) have fundamentally the same intent; and the same limitation of not covering *pending FRMP*

7.3.4 (ab) states that a type 5,6,7 meter cannot be altered by a *pending FRMP* unless MSATS Procedures has specific arrangements allowing change by *FRMP* before transfer. This clause does not cover change of type 1-4 to type 1-4 before transfer.

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

SP AusNet therefore consider that the current clauses need to be reworded to overcome the issues identified above and to avoid repetition and overlap between clauses in 7.2.5 dealing with RP responsibility and those in 7.3.4 dealing with metering installation types.

SP AusNet suggested rewording:

7.2.5(g) reword to just reference 7.3.4

The responsible person must:…….

(g) when installing or changing a metering installation do so consistent with clause 7.2.5(e) and clause 7.3.4

7.3.4(aa) the *FRMP*, or *pending FRMP* if allowed under clause 7.3.4(ab), may arrange alterations to any type 5, type 6 or type 7 *metering installation* to make it capable of *remote acquisition* unless otherwise provided for in the *metrology procedure*;

7.3.4 (ab) ~~The type 5, type 6 or type 7 *metering installation* under clause 7.3.4(aa)~~ the *pending FRMP* must not arrange to replace a metering installation ~~be altered~~ until the transfer of the relevant *market load* has been effected by *NEMMCO* in accordance with the *Market Settlement and Transfer Solution Procedures*, unless the *Market Settlement and Transfer Solution Procedures* specify arrangements for the alteration of the *metering installation* to be carried out on a date that is different to the *market load* transfer date;

7.3.4 (ac) If the *financially responsible Market Participant* or pending *FRMP* arranging for the replacement of a metering installation ~~referred to in clause 7.3.4(aa)~~ is not also the *responsible person* for the *metering installation* that is to be replaced, the *financially responsible Market Participant* or pending *FRMP* must advise the *responsible person* for that *metering installation* of its date of replacement prior to the replacement of that *metering installation*;

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

SP AusNet have some further concerns with the concept of meter change before transfer as allowed under 7.3.4 (ab). Whilst the MSATS Procedures are an appropriate location for the detailed "arrangements" to apply in this scenario (better than the only current definition of the arrangements which is within a document reference by the Meter Data Providers Service Level Requirements), SP AusNet consider that there are two aspects of the process which should be defined in the *Rules* as they impact fundamental responsibilities:

(i) Current RP responsibilities

For a meter replacement which involves a change of RP, eg type 5,6,7 to type 1-4 with *FRMP* as RP, during the period between meter change and the actual transfer date the RP before the change will remain the RP, as the RP change in MSATS will not happen until the actual transfer date. This RP however will no longer be able to comply with *Rules* clause 7.2.1 (c)(2) which requires him to "engage" a *metering provider* as the *metering provider*s with whom the RP has a contract will no longer have access to, or knowledge of, the metering installation, and hence the RP will no longer be able to comply with clause 7.2.1 to maintain the metering installation and all the associated detailed requirements. This is a significant regulatory exposure for the RP!

SP AusNet consider that there is a strong need for the *Rules* to recognise this "RP meter churn gap" period. The *Rules* must either remove or relax the RP's obligations (and those of their metering service providers) during the gap period, or assign the RP role to the "pending" RP not the current RP as defined in MSATS.

SP AusNet consider that the concept of the RP is fundamental to maintaining metering integrity and hence we consider that the latter is the correct option.

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

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

The relevant NEMMCO/industry working group currently is considering a paper which is proposing, in some detail, changes to the transfer rules to achieve this outcome.

(ii) Transfer failure

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

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

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

Participants are not prevented from exercising their current implied right to upgrade a metering installation if the economics of the upgrade is attractive to that Market Participant, unless jurisdictional policy imposes an alternate requirement, in which case the alternate requirement will be included in the metrology procedure. For example, a jurisdiction that is to commence Full Retail Competition in the future may require (for a sunset period) all manually read meters to be read as accumulation meters, even if they are interval meters. Under this situation, the Market Participant should not be able to use this clause to overrule jurisdictional policy by classifying the metering installation as type 5, unless the jurisdiction is silent on this matter in the metrology procedure]

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(h) in its role as incoming *responsible person*, be responsible for the *metering installation* on the day that a *market load* transfers from one *financially responsible Market Participant* to another *financially responsible Market Participant* for the period as specified in the *Market Settlements and Transfer Solution Procedures*.

[Clause 7.2.5(h) provides the head of power for accepted industry practice, being the period from 00:01 hours to 24:00 hours, to be made definitive within MSATS procedures so as to minimise a dispute on this matter]

7.2.6 [Deleted]

7.2.7 Registration of metering installations{ XE "metering" }

(a) *NEMMCO* must establish and *publish* a registration process to facilitate the application of this Chapter 7 to *Market Participants* and *Network Service Providers* in respect of:

(1) new *metering installations;*

(2) modifications to existing *metering installations;* and

(3) decommissioning of *metering installations,*

including the provision of information on matters such as application process, timing, relevant parties, fees and *metering installation* details.

7.2.8 Market Settlement and Transfer Solution Procedures

(a) *NEMMCO* in consultation with *Registered Participants* in accordance with the *Rules consultation procedures* must develop and *publish Market Settlement and Transfer Solution Procedures*.

(b) *NEMMCO* may from time to time amend *the Market Settlement and Transfer Solution Procedures* in consultation with *Registered Participants* in accordance with the *Rule consultation procedures*. *NEMMCO* must *publish* any such amendment to the *Market Settlement and Transfer Solution Procedures*.

Item 15 7.2.5(h)

SP AusNet consider that this clause will need revision to reflect the SP AusNet recommendation, and the industry transfer process change currently under consideration, with respect to early change of RP when the meter is replaced before the transfer date.

Further the clause is not general enough to cover the situation of a meter change and associated RP change without a change of *FRMP*. Eg *FRMP* changes RP from LNSP to themselves in association with a meter change and should be reworded.

Pages 13 (remainder of) to 23 (part there off) are IEC/B2B and not included in this submission	
Page 23, 24, 25 P26 deleted or relocated clauses only not included in this submission Page 27, 28, 29, 30	No comments

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(A) the *participating jurisdiction's Minister* provides *NEMMCO* with a detailed written explanation as to why the *Minister's participating jurisdiction* cannot adopt the *metrology procedure*;

(B) the *jurisdictional policy directive* contains a date by which a *participating jurisdiction* will undertake a review to evaluate that *participating jurisdiction*'s ability to harmonise the *jurisdictional policy directive* with the *metrology procedure* ('the review date');

(C) the *jurisdictional policy directive*, as implemented by the *metrology procedure*, ends on the review date unless the relevant *Minister* issues *NEMMCO* with a new *jurisdictional policy directive* in accordance with clause 7.3.2A(g);

(D) the *jurisdictional policy directive* is consistent in content with the information specified in clauses 7.3.2A(b)(1) and 7.3.2A(c)(2) , but may also address the following matters for the relevant *participating jurisdiction*:

(i) guidelines for the replacement of a device capable of producing *interval energy data* with a device that only produces *accumulated energy data*; and

(ii) the specification of the *type 5 accumulation boundary*. The *type 5 accumulation boundary* is to be zero MWh unless specified otherwise in the *metrology procedure*;

(E) the *metering data* is not prevented from being extracted or emanating from a *data logger* as *interval energy data* if required by the *financially responsible Market Participant* or an *Local Network Service Provider* for the purpose other than for *settlements*;

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(2) contain the following matters:

[Clause 7.3.2A(c)(2) has been introduced to provide industry with a level of certainty as to the extent of content of the metrology procedure. It works in conjunction with clause 7.3.2A(b)(1)]

(A) Clarification of the *Rules* in regards to the following processes:

(i) *load* profiling;

(ii) provision and service of *meters*;

(iii) provision of *energy data services*;

(iv) metrology for a *market load* connected to a *network* where the owner or operator of that *network* is not a *Registered Participant*; and

(v) accreditation of *Metering Providers*;

Item 16 7.3.2A (c)(2)

The items in 7.3.2A (c)(2) are mandatory coverage of the *Metrology procedure* and hence 7.3.2A (c)(2) should hence become 7.3.2A (ca) and commence with the "leader phrase"

The *Metrology Procedure* must contain the following matters:

……..

Page 32, 33,	No comments

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(C) at the conclusion of the *Rules consultation procedure* conducted under clause 7.3.2A(g)(1)(B), advise the relevant *Minister* of the outcome of that *Rules consultation procedure*;

(D) unless advised otherwise by the *Minister* resulting from information provided to the *Minister* under clause 7.3.2A(g)(1)(C), incorporate any *jurisdictional policy directive* in the *metrology procedure* that is in the nature of a guideline, specification or other standard for the *Minister's participating jurisdiction*;

(2) not a *jurisdictional policy directive*, *NEMMCO* must:

(A) acknowledge receipt of the proposal to the person who submitted it;

(B) advise of the action that *NEMMCO* will undertake, being either to accept it, request more information, or reject it. If *NEMMCO*:

(i) requests more information, on receiving that information *NEMMCO* must either accept the proposal or reject it;

(ii) accepts the proposal, *NEMMCO* must conduct a *Rules consultation procedure* on it;

(iii) rejects the proposal, *NEMMCO* must advise the person in writing of the reason for rejecting it;

(C) at the conclusion of the *Rules consultation procedure* conducted under clause 7.3.2A(g)(2)(B) revise, if appropriate, the *metrology procedure* to incorporate the outcome of the consultation.

7.3.2 Connection and metering point{ XE "connection and metering point" }

(a) The *responsible person* must ensure that:

(1) the *revenue metering point* is located as close as practicable to the *connection point*; and

(2) any *instrument transformers* required for a *check metering installation* are located in a position which achieves a mathematical correlation with the *revenue metering data*.

(b) The *Market Participant*, the *Local Network Service Provider* and *NEMMCO* must use their best endeavours to agree to adjust the *metering data* which is recorded in the *metering database* to allow for physical losses between the *metering point* and the relevant *connection point* where a *meter* is used to measure the flow of electricity in a power conductor.

(c) Where a *Market Network Service Provider* installs a *two-terminal link* between two *connection points*, *NEMMCO* in its absolute discretion may require a *metering installation* to be installed in the facility at each end of the *two-*

Item 17 7.3.2A (g)(1)(D)

SP AusNet would be concerned if the jurisdictional policy directive was used for other than the establishment of firm mandatory requirements for the Jurisdiction involved; SP AusNet do not support the concept of the *Metrology procedure* being used to incorporate lesser "recommendations" such as would be contained in a Guideline. The aim of the MHP is to remove any "subtle" Jurisdictional variations to simplify market metrology; the *Rules* should not condone an approach to add others.

terminal link. Each of these *metering installations* must be separately assessed to determine the requirement for *check metering* in accordance with schedule 7.2.

7.3.3 Use of metering data{ XE "metering" }

(a) *Revenue metering data* must be used by *NEMMCO* as the primary source of *metering data* for billing purposes.

(b) *Check metering data*, where available, must be used by *NEMMCO* for:

(1) validation;

(2) substitution; and

(3) account estimation,

of *revenue metering data* as required by clause 7.9.4.

7.3.4 Metering installation { XE "meters" } types and accuracy

(a) The type of *metering installation* and the accuracy requirements for a *metering installation* ~~which~~ that must be installed in respect of each *connection point* are to be determined in accordance with schedule 7.2;

(aa) The *financially responsible Market Participant* may arrange alterations to any type 5, type 6 or type 7 *metering installation* to make it capable of *remote acquisition* unless otherwise provided for in the *metrology procedure*;

[Note that the intent of clause 7.3.4(aa) is to allow the FRMP to replace either a type 5, type 6 or type 7 metering installation with a type 4 metering installation (or type 3 etc, as the case may be) unless this is prohibited by jurisdictional policy and recorded as such in the metrology procedure. The clause carries an implied requirement for the FRMP in undertaking the replacement, to do so in accordance with clause 7.1.4(a) that requires the change to be registered with NEMMCO (paragraph (1)) and to have a NMI (paragraph (3), which will be important if an unmetered load is to be transferred away from a type 7 metering installation)]

(ab) The type 5, type 6 or type 7 *metering installation* under clause 7.3.4(aa) must not be altered until the transfer of the relevant *market load* has been effected by *NEMMCO* in accordance with the *Market Settlement and Transfer Solution Procedures*, unless the *Market Settlement and Transfer Solution Procedures* specify arrangements for the alteration of the *metering installation* to be carried out on a date that is different to the *market load* transfer date;

[Clause 7.3.4(ab) has been included to provide the MSATS procedures with a head of power that has not been specifically provided for in clauses 7.2.7 and 7.2.8 or elsewhere in Chapter 7. This clause supports current industry practice in that it allows parties to the transfer (old FRMP, new FRMP, LR and responsible person) to establish a practical and stable

7.3.4

SP AusNet has raised a number of concerns re this section and suggested rewording to overcome these concerns in our Item 14 above.

transfer arrangement in MSATS that can be relied on by the parties to the extent that a failure to participate in the arrangement can be challenged through the dispute resolution process]

(ac) If the *financially responsible Market Participant* referred to in clause 7.3.4(aa) is not also the *responsible person* for the *metering installation* that is to be replaced, the *financially responsible Market Participant* must advise the *responsible person* for that *metering installation* of its date of replacement prior to the replacement of that *metering installation*;

[Clauses 7.3.4(ac) has been added to ensure that the FRMP communicates a proposed change in the type of the metering installation to the current responsible person (with whom the new FRMP does not have a commercial contract) prior to exercising any rights the new FRMP has to change the metering installation]

(b) A *check metering installation* is not required to have the degree of accuracy required of a *revenue metering installation* but must have a mathematical correlation with the *revenue metering installation*, and be consistent with the requirements of schedule 7.2~~.~~;

(c) *Metering installations* in use at the *market commencement* must conform with the provisions of Chapter 9~~.~~;

(d) The accuracy of a type 6 *metering installation* must be in accordance with regulations issued under the National Measurement Act 1960 (Cth) and, in the absence of any regulations, the ~~appropriate~~ *metrology procedure*~~.~~;

[The change in part is a consequence of another change. Editorial change due to the removal of italics on National Measurement Act]

(e) ~~Each *Metrology Coordinator* must advise *NEMMCO* by no later than 30 April each year of how much longer it proposes to allow its *metrology procedure(s)* to contain type 6 *metering installation(s)* within its jurisdiction.~~[Deleted]

[This clause has been deleted in accordance with recommendation 8.2 of the JJR]

7.3.5 Data collection system{ XE "data:collection system" }

(a) **[Deleted]**

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(b) *NEMMCO* must establish processes for the collection of *metering data* for the *metering database* from each *metering installation* in accordance with the requirements of clause 7.9.

(c) *NEMMCO* may use *agency data collection systems* to collect *metering data*, process *metering data* into *settlements ready data* and to transfer *metering data* to the *metering database*.

Item 18 7.3.5(b)

Refer SP AusNet comments in our Item 13 above regarding the lack of clarity of roles and responsibilities and interfaces because of the convoluted definitions used. This clause which defines NEMMCO responsibility (and their MDA's role) leaves it unclear whether the Type 4B *remote acquisition* process is part of this responsibility or whether it is delivering metering data from the site to the metering installation database and hence is the responsibility of the RP (and their *metering provider*'s role).

Refer further SP AusNet comments with respect to clause 7.11.

(d) *NEMMCO* may obtain *metering data* directly from a *metering installation* for the *settlements* process.

(e) Rules and protocols in respect of use of a *data collection system* and its connection to a *metering system* must be approved by *NEMMCO* and *NEMMCO* must not unreasonably withhold such approval.

(f) Data formats used in respect of a *data collection system* must allow access to *metering data* at a *metering installation* and from the *metering database*.

7.3.6 Payment for metering{ XE "metering:payment" }

(a) Subject to clause 7.3.6(aa), the *financially responsible Market Participant* is responsible for payment of all costs associated with the provision, installation, maintenance, routine testing and inspection of the *metering installation*. This includes:

(1) the cost of providing *metering data* and *settlements ready data* to the *Local Network Service Provider* and to the *Local Retailer* to enable these parties to the extent required to fulfil their obligations under the *Rules*;

(2) the cost of providing *metering data* to *NEMMCO*; and

(3) the cost of preparing *settlements ready data* where such costs will not be recovered by *NEMMCO* in accordance with clause 7.3.6(ab)~~.~~;

(aa) If a ~~*Market Participant*~~ *responsible person* allows another person to engage a *Metering Provider* to install a *metering installation* in accordance with clause 7.2.2(c)(1) ~~7.2.3(a)(1)~~, the *Market Participant* under clause 7.3.6(a) is not responsible for the payment of the costs of installation of the relevant *metering installation*~~.~~;

[The change is a consequence of another change]

(ab) When *NEMMCO* is required to undertake functions associated with a *metering installation* in accordance with the requirements of the *metrology procedure*, *NEMMCO's* cost is to be recovered through *Participant fees* in accordance with a budget prepared under clause 2.11.3(b)(3) unless the *metrology procedure* specifies an alternative method of cost recovery, in which case *NEMMCO* must not recover the costs through *Participant fees*. These functions could include the preparation and application of a *profile*~~.~~;

[The change is a consequence of another change]

(ac) Clause 7.3.6(a) does not apply in respect of the recovery by a *Local Network Service Provider* of its costs associated with the provision, installation, maintenance, routine testing and inspection of type 5, type 6 or type 7 *metering installations*, to the extent that these costs can be recovered by the *Local Network Service Provider* in accordance with a determination made by the *AER* or a relevant *Jurisdictional Regulator*;

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Item 19 7.3.6(ac)

This clause assumes that the LNSP will not be recovering any costs of type 4 metering installations (including type 4B) from a determination made by the AER or the Jurisdictional Regulator, whereas there is some possibility that the Victorian AMI arrangements (which are fundamentally type 4) will involve a determination with respect to cost recovery by the LNSPs.

[The change is a consequence of the deletion of the Chapter 9 derogation for all participating jurisdictions]

(b) Subject to clause 7.3.6(a), any costs incurred in gaining access to *metering data* must be paid by the party who obtained the *metering data*.

(c) The cost of requisition testing and audits must be paid by the party requesting the test or audit, except where the *metering installation* is shown not to comply with this Chapter, in which case the *responsible person* in relation to that *metering installation* must bear the cost.

7.4 Metering Providers

7.4.1 Responsibility

(a) Installation and maintenance of *metering installations* must be carried out only by a *Metering Provider*.

(b) A *Metering Provider* is responsible for providing and maintaining the security controls of a *metering installation* in accordance with clause 7.8.2.

7.4.2 Qualifications and registration of Metering Providers{ XE "Metering Providers:qualifications" }

(a) A *Metering Provider* is a person who:

(1) meets the requirements set out in schedule 7.4; and

(2) is accredited and registered by NEMMCO in that capacity in accordance with the qualification process established under clause S7.4.1(b).

(b) Any person may apply to NEMMCO for accreditation and registration as a *Metering Provider*.

(ba) *NEMMCO* must, in accordance with *Rules consultation procedures,* prepare and *publish* guidelines in respect of the accreditation of *Metering Providers*. The adoption of the guidelines by *Metering Providers* is to be included in the qualification process in accordance with schedule 7.4.1(b). The guidelines must include a dispute resolution process.

(bb) A *Metering Provider* must comply with the provisions of the *Rules,* and of procedures authorised under the *Rules*, and with any requirements established by *NEMMCO* under clause 7.4.2(bc), that are expressed to apply to *Metering Providers.*

(bc) The requirements referred to in clause 7.4.2(bb):

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(1) must include the service level requirements with which the different categories of *Metering Providers* referred to in schedule 7.4 must comply; and

Item 20 7.4.2(bc)

SP AusNet consider that the *metering provider* accreditation for a type 4B metering installation would be different to a type 4A. Whilst a type 4A accreditation is that pertaining to current type 4 installations, the new type 4B meter data provider *metering provider*s would need to have forward estimating capability, lesser communications standards, ability to deal with next scheduled read date etc (similar to some extent to a manual read meter data provider)

Refer also to SP AusNet's comments in Item 25 re the interpretation of the *remote acquisition* process and its "position" relative to the telecommunications interface.

Refer further SP AusNet comments with respect to schedule 7.4. (Item 38)

P39	No comments

setting out the nature of the breach and if the *Metering Provider* remains in breach for a period of more than 7 *days* after notice from *NEMMCO, NEMMCO* may deregister the *Metering Provider*.

(aa) If *NEMMCO* reasonably determines that a *Metering Provider* may have breached the requirements of clause 7.4.2(bb), it must conduct a review of the *Metering Provider's* capability to install and maintain a *metering installation*. The outcome of the review may be deregistration, suspension of some categories of registration or continued operation under constraints agreed with *NEMMCO*.

(b) If, in the reasonable opinion of *NEMMCO,* a *Metering Provider* has acted in any way which is unethical, *NEMMCO* may deregister that *Metering Provider*.

(c) This clause 7.4.3 sets out the only action that can be taken against a *Metering Provider*:

(1) for a breach by that *Metering Provider* of provisions of the *Rules* or of procedures authorised under the *Rules*, or of any requirements established by *NEMMCO* under clause 7.4.2(bc), that are expressed to apply to *Metering Providers*; or

(2) by *NEMMCO* as a result of that *Metering Provider* acting in a way which is unethical.

7.5 Register of Metering Information

7.5.1 Metering register{ XE "metering register" }

(a) As part of the *metering database*, *NEMMCO* must maintain a *metering register* of all *revenue metering installations* and *check metering installations* which provide *metering data* used for *NEMMCO* account statements.

(b) The *metering register* referred to in clause 7.5.1(a) must contain the information specified in schedule 7.5.

7.5.2 Metering register discrepancy{ XE "metering register" }

(a) If the information in the *metering register* indicates that the *revenue metering installation* or the *check metering installation* does not comply with the requirements of the *Rules*, *NEMMCO* must advise affected *Registered Participants* of the discrepancy.

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(b) If a discrepancy under clause 7.5.2(a) occurs, then the *responsible person* must arrange for the discrepancy to be corrected within 2 *business days* unless exempted by *NEMMCO*.

Item 21 7.5.2(b)

Whilst this clause specifically relates to the "special case" of metering installation issues detected by NEMMCO, the SP AusNet comments with respect to clause 7.11(b) re malfunction repair timing are relevant here also.

P41, 42, 43, 44, 45	No comments.

ATTACHMENT B
Based on a clean copy of the Rules, issued by MCE, in force on 1 July 2005
Proposed Rule changes for Project 1 "metrology procedure" and LNSP derogations

(b) Where a *metering installation* database is used as a *data logger (metering installation* types 6 and 7), the *energy data* relating to the amount of *active energy* passing through a *connection point* must be collated or determined in *trading intervals* within a *metering installation* unless it is specified in the *metrology procedure* that the data may be converted into *trading interval* data in the *NEMMCO* substitution process referred to in clause 7.9.4(a), in which case the *metrology procedure* must specify:

(1) the parameters to be used in preparing the *trading interval* data for each *market load*, including the algorithms;

(2) the first-tier *energy data* that is to be used in the conversion process;

(3) the quality and timeliness of the first-tier *energy data*;

(4) the party responsible for providing the first-tier *energy data*; and

(5) if required, the method of cost recovery in accordance with clause 7.3.6(ab).

7.9.4 Data validation and substitution{ XE "data:validation and substitution" }

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(a) *NEMMCO* is responsible for the validation and substitution of *metering data* which must be undertaken in accordance with the procedures developed by *NEMMCO* under clause 7.9.4(b).

(b) *NEMMCO* must develop data validation, estimation and substitution procedures that produce *settlements ready data* in accordance with the *Rules consultation procedures* and the requirements of the ~~relevant~~ *metrology procedure* which have been prepared in accordance with clause 7.9.3. For the purpose of clarification, and if such a requirement is specified in the *metrology procedure,* the validation, estimation and substitution procedures are to include the method by which accumulated *metering data* is to be converted into *trading interval* data and the method of managing the first-tier *energy data* that is necessary to enable this conversion to take place.

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[The word estimation added to the title of the data validation and substitution procedures to clarify the breadth of these procedures. The word relevant rendered unnecessary by creation of a single metrology procedure]

(c) *Check metering data*, where available, must be used by *NEMMCO* to validate *metering data* provided that the *check metering data* has been appropriately adjusted for differences in *metering installation* accuracy.

(d) If *check metering data* is not available or *metering data* cannot be recovered from the *metering installation* within the time required for *settlements*, then a substitute value is to be prepared by *NEMMCO* using a method agreed with the *Market Participant* and the *Local Network Service Provider*.

[Editorial change]

Item 22 7.9.4 (a)

"estimation" has been added to clause 7.9.4 (b) but not this clause?

Item 23 7.9.4(b) + 7.9.4(d) + 7.9.5 (a) to (c)

Whilst the redrafting has added "estimation" to "clarify the breadth of these procedures" this clause and the others notated above fail to recognise that most of the validation, estimation and substitution is carried out not in the metering database by NEMMCO and their agents, but in the metering installation database by the RP and their *metering provider*s.

SP AusNet recognise that NEMMCO do have the responsibility for higher level validation, and do estimation and substitution if the RP's *metering provider* fails to deliver to meet settlements. SP AusNet consider that these aspects must be recognised separately in the New *Rules* to the roles of the RP and the *metering provider*.

These clauses are also another example of the concerns SP AusNet outlined in our Item 13 above where the terminology re "components" of the metering installation and data process is confusing and impacts on the allocation of responsibilities. The "stretch" definition used for FRC includes the elements of creating the profile and generating the profiled data from accumulation metering data as substitution; this is an unnecessarily obscure reference to a key market process. SP AusNet consider that this must be better defined.

(e) If *NEMMCO* detects a loss of *metering data* or incorrect *metering data* from a *metering installation*, it must notify the *Market Participant* and *Local Network Service Provider* within 24 hours of detection.

7.9.5 Errors found in metering tests, inspections or audits

(a) If a *metering installation* test, inspection or audit, carried out in accordance with clause 7.6, demonstrates errors in excess of those prescribed in schedule 7.2 and *NEMMCO* is not aware of the time at which that error arose, the error is to be deemed to have occurred at a time half way between the time of the most recent test or inspection which demonstrated that the *metering installation* complied with the relevant accuracy requirement and the time when the error was detected.

(b) If a test or audit of a *metering installation* demonstrates an error of measurement of less than 1.5 times the error permitted by schedule 7.2, no substitution of readings is required unless in *NEMMCO's* reasonable opinion a particular party would be significantly affected if no substitution were made.

(c) If any substitution is required under clause 7.9.5(b), then *NEMMCO* must provide substitute readings to effect a correction for that error in respect of the period since the error was deemed to have occurred.

7.10 Confidentiality{ XE "confidentiality" }

Metering data and passwords are confidential data and are to be treated as *confidential information* in accordance with the *Rules*.

7.11 Performance of Metering Installation{ XE "metering installation" }

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(a) Where the ~~*metering* installation has the capability for the daily delivery~~ *remote acquisition* of *metering data* from a device~~(s)~~ contained within the site of the *metering installation*, ~~*metering data* is required for all *trading intervals*~~:

(1) ~~at the level of accuracy prescribed in schedule 7.2;~~[Deleted]

(2) ~~within the time required for *settlements* at a level of availability of at least 99% per annum for *instrument transformers* and other components of the *metering installations*, not including the *communication link*;~~ ~~and~~[Deleted]

(3) ~~within the time required for *settlements* at a level of availability of at least 95% per annum for the *communication link*;~~[Deleted]

[Clauses 7.11(a)(1), (a)(2) and (a)(3) have been transferred to clause 7.11(a)(4) without alteration. The transfer has been introduced to enable a distinction to be made between remote acquisition and non-remote acquisition of metering data from a site when an interval meter and electronic communication to the site are available]

Item 24 7.11(a)

As per our comments in Item 3c the definition of *Remote acquisition* is attempting to define the "location" of the *remote acquisition* process. The phase ".....from a device(s) contained within the site of the *metering installation"* is therefore superfluous and likely to cause further uncertainty re the definition.

Item 25 7.11(a) and Glossary

25.1 Interfacing

The detailed definition of the term "remote acquisition" is critical to the differentiation between type 4A, type 4B and type 5 metering installations and hence, given that allocation of "exclusive" LNSP responsibility v's contestable Retailer responsibility relies entirely on this differentiation, the allocation of responsibilities. The "remote acquisition" definition fails to make it completely clear as to whether the acquisition process is considered to be beyond the telecommunications interface; if it is not then it would be considered a communications link within the metering installation. If beyond the telecommunications interface it is NEMMCO's responsibility and would require a MDA to be appointed; if within the metering installation it is the RP's responsibility and they would contract for *metering provider*s to carry out the role.

The following is the New *Rules* definition:

remote acquisition: (new)

The acquisition of *metering data* from a *metering installation*, where the acquisition process is designed to transmit the *metering data* from the site of the *metering point* to the *metering database*, and does not, at any time, require the presence of a person at, or near, the *meter* for the purposes of data collection or data verification (whether this occurs manually as a walk by reading or through the use of a vehicle as a close proximity drive-by reading), and includes but is not limited to an interval *meter* that transmits *metering data* via: (1) direct dial-up; (2) satellite; (3) the internet; (4) a general packet radio service; (5) power line carrier; or (6) any other equivalent technology.

Based on SP AusNet understanding of the *Rules* definitions of the metering and data process steps and interfaces, this contains some conflicting and unclear wording:

"acquisition of metering data from a metering installation" appears to indicate data beyond the telecommunications interface ie NEMMCO responsibility with MDA

"transmit the metering data from the site of the metering point to the metering database" this would involve a communications link to get the data from the site of the meter / data logger to the metering installation database and then the delivery thru the telecommunication network (MSATS Hub) to the metering database ie the role the RP is currently responsible for with their *metering provider*s.

The explaining text below 7.11(a) makes reference to clause 7.3.1(a)(9), however this clause is linking the wording in 7.11(a) to the communications link ie "favouring" the second interpretation above which equates the *remote acquisition* process to the communications link and hence places the *remote acquisition* of metering data process <u>within</u> the metering installation.

25.2 interval only

SP AusNet consider that this clause (7.11(a)) refers only to interval capable metering installations. However SP AusNet's assessment is that the only specific reference to this, and hence the only exclusion of metering installations delivering accumulated metering data, is within the definition of remote acquisition. However this fact is not prominent or clear within the definition.

SP AusNet recommend that the glossary definition be significantly reworded to remove the issues identified above.

ATTACHMENT B
Based on a clean copy of the Rules, issued by MCE, in force on 1 July 2005
Proposed Rule changes for Project 1 "metrology procedure" and LNSP derogations

(4) and *NEMMCO* requires actual *metering data* to ensure compliance with Chapter 3, *metering data* is required for all *trading intervals*:

[In clause 7.11(a)(4) the reference to "actual" metering data is linked to clause 7.3.1(a)(9)]

(A) at the level of accuracy prescribed in schedule 7.2;

(B) within the timeframe required for *settlements* and prudential requirements specified in the procedures established by *NEMMCO* under clause 7.11(ab) at a level of availability of at least 99% per annum for *instrument transformers* and other components of the *metering installations*, not including the *communication link*; and

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(C) within the timeframe required for *settlements* and prudential requirements specified in the procedures established by *NEMMCO* under clause 7.11(ab) at a level of availability of at least 95% per annum for the *communication link*;

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or as otherwise agreed between *NEMMCO* and the *responsible person*; or

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[Clause 7.11(a)(4) represents a relocation of clauses 7.11(a)(1), (a)(2) and (a)(3). The term "actual" has been added to qualify metering data to support the operation of clause 7.3.1(a)(9). It more appropriately describes the metering data that this clause relates to]

(5) and *NEMMCO* does not require actual *metering data* to ensure compliance with Chapter 3, *metering data* is required for all *trading intervals*:

[In clause 7.11(a)(5) the reference to "actual" metering data is linked to clause 7.3.1(a)(10)]

(A) at the level of accuracy prescribed in schedule 7.2;

(B) within the timeframe required for *settlements* specified in the procedures established by *NEMMCO* under clause 7.11(ab);

[Clause 7.11(a)(5)(B) requires NEMMCO to identify the timeframe in a suitable procedure, which could be the metrology procedure, or it could be another document. NEMMCO is given the flexibility to determine the most appropriate document]

(C) as actual, substituted or estimated in accordance with the procedures established by *NEMMCO* under clause 7.9.4(b); and

[Clause 7.11(a)(5)(C) - "format" has been replaced by "actual, substituted or estimated" to clarify the intent of this requirement]

Item 26 7.11(a)(4)(B) & (C)

SP AusNet consider that these two clause, whilst copied directly from the Current *Rules* are not a rigorous and technically correct definition of the timeframes expected for delivery of interval data for a type 4A metering installation.

These were discussed in the MRG and none of the group were able to define what the measures meant ; *metering providers* in the group who are accredited for type 1-4 meters have not been audited against these measures, but rather against measures more directly related to actual reads undertaken and delivered.

NEMMCO requires actual *metering data*….. for all *trading intervals*:
……
(B) within the timeframe required for *settlements* and prudential requirements specified ……at a level of availability of at least 99% per annum for *instrument transformers* and other components of the *metering installations*, not including the *communication link*;
and
(C) within the timeframe required for *settlements* and prudential requirements specified……at a level of availability of at least 95% per annum for the *communication link*;

SP AusNet's strong preference would be for these two clauses to be removed from the New rules and replaced by clauses the same as used to define the performance of other meter types (type 4B in clause 7.11(a)(5) and type 5 & 6 in clause 7.11(aa)).

SP AusNet wording preference would be:

(B) within the timeframe required for *settlements* specified in the procedures established by *NEMMCO* under clause 7.11(ab);

(D) in accordance with the performance standards specified in the procedures established by *NEMMCO* under clause 7.11(ab).

ATTACHMENT B
Based on a clean copy of the Rules, issued by MCE, in force on 1 July 2005
Proposed Rule changes for Project 1 "metrology procedure" and LNSP derogations

(D) in accordance with the performance standards specified in the procedures established by *NEMMCO* under clause 7.11(ab).

[Clause 7.11(a)(5)(D) requires NEMMCO to specify the quality standards of the delivered data in a suitable procedure]

[Clause 7.11(a)(5) allows for certain types of interval meters that are connected to electronic communication facilities to have their reading cycle relaxed. The performance controls imposed on this category of metering installation are identical to that imposed under clause 7.11(aa). The term "actual" has been added to qualify metering data to support the operation of clauses 7.3.1(a)(9) and 7.3.1(a)(10). It more appropriately describes the metering data that this clause relates to]

(aa) Where the *metering installation* does not have the capability for ~~the *daily* delivery *remote acquisition*~~ of actual *metering data* arising from a device~~(s)~~ contained within the site of a *metering installation*, *metering data* is required:

[In clause 7.11(aa) the reference to "actual" metering data has been added to support the operation of clause 7.3.1(a)(10)]

(1) at the level of accuracy prescribed in schedule 7.2;

(2) within the timeframe ~~and in the format~~ required for *settlements* ~~as~~ specified in the procedures established by *NEMMCO* under clause 7.11(ab)~~in accordance with clause (b)~~;

[Clause 7.11(aa)(2) has been separated into two paragraphs, (2) and (2a), to improve the reading of this clause]

(2a) as actual, substituted or estimated in accordance with the procedures established by *NEMMCO* under clause 7.9.4(b); and

[Clause 7.11(aa)(2a) - "format" has been replaced by "actual, substituted or estimated" to clarify the intent of this requirement]

(3) in accordance with the performance standards specified in the procedures established by *NEMMCO* under clause 7.11(ab)~~pursuant to *Rules consultation procedures*~~.;

[Clause 7.11(aa)(3) requires NEMMCO to specify the quality standards of the delivered data in a suitable procedure]

(ab) *NEMMCO* must establish procedures in accordance with the *Rules consultation procedures* that detail:

(1) the parameters that determine when *metering data* must be delivered to *NEMMCO* for the purposes of Chapter 3. Such parameters must include, but are not limited to, the volume limit per annum below which *NEMMCO* will not require *metering data* for those purposes;

This would enable the debate re actual performance standards for all meter types to be conducted together during the development of these procedures. This debate could embrace the consideration of actual metering data delivery standards which, as specified in the Metrology Procedure, are also not technically sound or practical and different in approach to those in this clause of the *Rules*

Item 27 7.11(a)(4)

Type 1-4A data obviously needs to be substituted and estimated in a similar manner to type 4B and type 5-7 data. Hence the following clause which is within clause 7.11(a)(5) and clause 7.11(aa) should be included as 7.11(a)(4)(D).

as actual, substituted or estimated in accordance with the procedures established by *NEMMCO* under clause 7.9.4(b)

Item 28 7.11(a)(4)

This clause includes the following:

or as otherwise agreed between *NEMMCO* and the *responsible person*.;

SP AusNet cannot understand why this is included and consider it should be removed. If however there is a specific reason why this option is available, then why is it not available for the other meter types covered within clause 7.11(a)(5) and clause 7.11(aa).

Refer also to Item 2 for SP AusNet comments re need for Procedures to be developed in the timeframe of putting these New *Rules* in place.

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(2) the timeframe obligations for the extraction or delivery of *metering data* from a *metering installation* for the purpose of *settlements*;

(3) the performance standards for *metering data* required for the purpose of *settlements*;

29

[Clause 7.11(ab) has been added to provide industry with improved certainty on the location and formality of information that is critical to the operation of types 4, 5 and 6 metering installations. This has arisen because a low volume type 4 metering installation is now able to delay the delivery of metering data beyond the daily delivery that was originally specified in the Code. The crossover volume limit within type 4 becomes an important feature for Market Participants that is entirely under NEMMCO's control due to requirements for prudential supervision and settlements obligations]

30

(b) If an *outage* or malfunction occurs to a *metering installation,* repairs must be made to the *metering installation* as soon as practicable and in any event within 2 *days* of detection or such time as detection should have reasonably occurred, unless an exemption is obtained from *NEMMCO*.

(ba) *NEMMCO* must establish and *publish* a procedure applicable to the provision of exemptions in accordance with clause 7.11(b). *NEMMCO* may revise the procedure from time to time.

(bb) If an exemption is provided by *NEMMCO* under 7.11(b) then the *Metering Provider* must provide *NEMMCO* with a plan for the rectification of the *metering installation*.

(c) A *Registered Participant* who becomes aware of an *outage* or malfunction of a *metering installation* must advise *NEMMCO* as soon as practicable.

7.12 Meter Time{ XE "metering installation" }

(a) All *metering installation* and *data logger* clocks are to be referenced to Australian Eastern Standard Time and maintained to a standard of accuracy in accordance with the *load* through the *metering point* in accordance with schedule 7.2.

(aa) The *responsible person* must provide to *NEMMCO* suitable remote data access to set the time function of the *metering installation*.

(b) The *metering database* must be set within an accuracy of ±1 seconds of Australian Eastern Standard Time.

7.13 Evolving Technologies and Processes and Development of the Market{ XE "development of the market" }

(a) Evolving technologies or processes that:

(1) meet or improve the performance and functional requirements of this Chapter; or

Item 29 7.11(ab)(1) & explanatory wording

Although prudential and settlement obligations and outcomes have no direct impact on SP AusNet as a LNSP, changes to the Crossover Volume Limit could change metrology requirements for meters and hence impact LNSP RP obligations.

SP AusNet's expectation would be that because the Crossover Volume Limit impacts on the accuracy of settlements, that a proposal to change this would be subject to full *Rules* Consultation including impact on Participants. SP AusNet's view is that it should not be left "…….entirely under NEMMCO's control……"

Item 30 7.11(b)

SP AusNet have issues with all installations type 1 to type 5&6 (ie large I&C to domestic) having the same rule with respect to the required timetable and other details of replacement or repair requirements.

SP AusNet consider that whilst 2 day turnaround on a larger installation is reasonable, the standard for smaller installations should be extended and specific notification removed. The SP AusNet submission to the *Metering provider* Category B SLR *Rules* Consultation was as follows:

- For Type 1-4 (generally large) installations where the market expectation is daily data availability and high levels of data delivered to meet settlement timeframes the requirement should be:
  - Notice to RP and MDP immediately
  - Repairs within two days required in the SLR is OK or NER Exemption Request submitted Note: by the MP to NEMMCO and RP (not MP to RP to NEMMCO)
  - Fault Repair Plan from MP to NEMMCO within 2 further days. RP not directly needed to submit changes to Fault Repair Plan

- For Type 5-6 installations this requirement is too stringent and the period should be:
  - Notice to RP not required except as part of ongoing reporting
  - Notice to MDP required within 5 days
  - 95% of repairs done within 5 days
  - 100% of repairs within 10 days or NER Exemption Request submitted

- Fault Repair Plan not required

- For direct connect sites or other repair situations involving customer outage (eg CT repair) it should be recognised that customer outage must be negotiated and the regulatory requirements in Victoria require the customer be given 4 days notice

SP AusNet consider that the New *Rules* should be reworded to support this approach.

Pages 51, 52, 53

No comments

Page 54

Refer SP AusNet comments on ‘remote acquisition” definition in Item 3

Page 55

No comments

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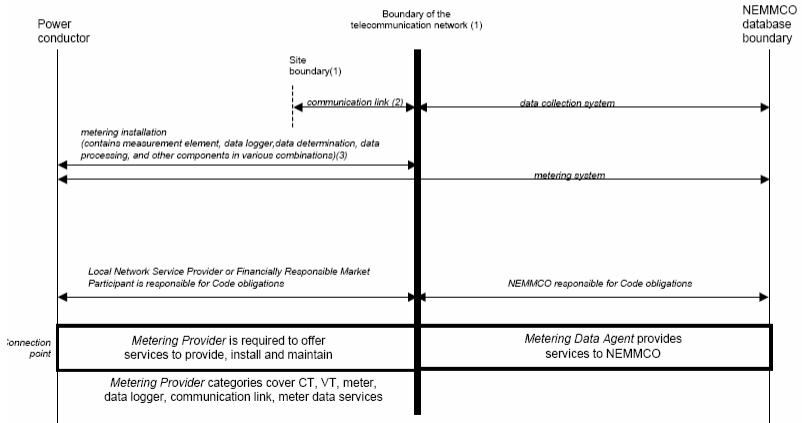
Schedule 7.1 - Responsibility for Metering{ XE "metering" }



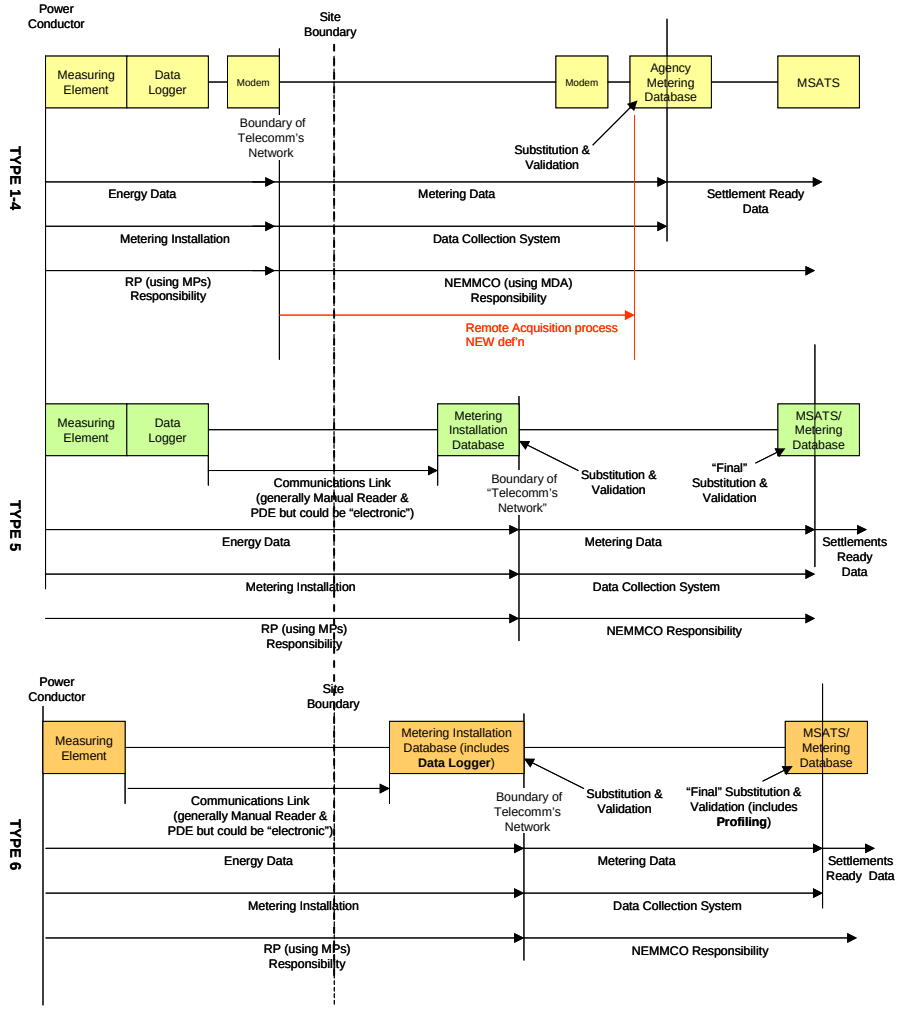
Note (1): the site boundary and the boundary of the telecommunications network may be the same point
Note (2): indicative position only. The communications link may contain a transmitter and receiver, isolation panel, modem, database, other suitable technology, data processing and/or data transfer process(s). There may be more than one communication link within a metering installation.
Note (3): the data logger may be local or remote to the site on the power conductor. It may be internal or external to the device containing the measurement element.

[Revised diagram with categories of Metering Provider added, and Metering Data Administrator replaced by Metering Data Agent]

Item 31 Schedule 7.1

Although this diagram in the New *Rules* has been revised to improve it as an aid to understanding definition and interfaces, it is still short of the detail required for industry personnel to deal with and interpret the current *Rules* wording. Refer SP AusNet Item 13 for further comments on the need for wording change.

SP AusNet consider that the diagram below or similar provides a better aid to understanding.



	Whilst this diagram may be slightly less general in its application it is considered by SP AusNet to be significantly more relevant and applicable to the majority of Participant relationships and situations.
Page 57	No comments

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S7.2.3 Accuracy requirements for metering installations

Table S7.2.3.1 Overall Accuracy Requirements of Metering Installation Components (note 1){ XE "Table 1 Overall Accuracy Requirements of Metering Installation Components (note1)" }

Type	Volume limit per annum per connection point	Maximum allowable overall error (±%) (refer Tables 2-5) at full load		Minimum acceptable class or standard of components	Metering installation or data logger Clock Error (Seconds) in reference to EST
		Active	reactive		
1	greater than 1000 GWh	0.5	1.0	0.2 CT/VT/Meter Wh 0.5 Meter varh	±5
2	100 to – 1000 GWh	1.0	2.0	0.5 CT/VT/ Meter Wh 1.0 Meter varh	±7
3	0.75 to less than 100 GWh	1.5	3.0	0.5 CT/VT 1.0 Meter Wh 2.0 Meter varh	±10
4	less than 750 MWh (note 2)	1.5	NA	Either 0.5 CT and 1.0 Meter Wh; or whole current connected *General Purpose meter MWh:* • with a *data logger; and* • meets the requirements of clause 7.11(a)	±20 (note 2a)
5	Less than x MWh (note 3)	1.5 (note 3b)	NA	Either 0.5CT and 1.0 *meter* Wh; or whole current connected *General Purpose meter* Wh; • with a *data logger;* and • meets the requirements of clause 7.11(aa)	±20 (note 3a)
6	Less than y MWh (note 4)	1.5 (note 4b)	NA	CT or whole-current connected *General Purpose meter* Wh with data processing used to convert *accumulated energy data* into *metering data* and to provide *estimated energy data* where necessary.	(note 4a)
7	Volume limit not specified (note 5)	(note 6)	NA	No *meter* Techniques for determination of *estimated energy data* to be included in the *metrology procedure.*	NA

32

33

S7.2.3

SP AusNet consider that a number of changes to Table 7.2.3.1 and the notes referenced in the Table are necessary to correctly incorporate type 4B metering installation in Schedule 7.

SP AusNet assessed changes are:

Item 32 type 4 volume limit

The introduction of type 4B and the related "crossover volume limit" leads to the situation that the new sub-type of type 4 (ie the type 4B) cannot to used up to 750 MWh. Hence the type 4 row in the table must be split into two rows:

- One for type 4A with the existing volume limit ie "less than 750MWh", and
- One for type 4B with a volume limit of "crossover volume limit MWh"

Item 33 maximum allowable error

SP AusNet considers as a principle that the fundamental accuracy and other "fundamental" metrology parameters of a type 4B and a type 5 should be the same. The aim of having type 4B is to enable remote reading but there is no drive in the ACCC derogation to improve accuracy etc for what under the Victorian AMI, and probably ultimately nationally, is the mass market meter type.

Hence SP AusNet consider that that note 3b should be revised by adding the wording "or type 4B" after type 5 in the clause and adding "(note 3b)" to type 4B row in Table 7.2.3.1

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Note 1: For types 3, 4, 5 and 6 *metering* installations, it is acceptable to use direct connected *meters* meeting the relevant requirements of AS 1284.1 "Electricity Metering - General Purpose Watt hour Meters". The *metering installation* must comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National ~~Standards Commission~~ Measurement Institute under the National Measurement Act 1960 (Cth).

[Editorial change. Change of name for the National Standards Commission. Removal of italics for National Measurement Act]

Note 2: *High Voltage* customers that require a *VT* and whose annual consumption is below 750 MWh, must meet the relevant accuracy requirements of Type 3 *metering* for *active energy* only.

34i

Note 2a: For the purpose of clarification, the clock for a type 4 *metering installation* may be relaxed by *NEMMCO* to accommodate evolving whole-current technologies that are acceptable in accordance with clause 7.13(a).

Note 3: A type 5 *metering installation* ~~will use a~~ must comply with the *metrology procedure* ~~established and approved by the relevant *Metrology Coordinator* for the purpose of~~ when converting *active energy* into *metering data*. The value of "x" ~~is to~~must be determined by the relevant ~~*Metrology Coordinator*~~*Minister* and must be provided as a *jurisdictional policy directive* to *NEMMCO*. The maximum acceptable value of "x" is 750 MWh per annum. The *metering installation* may provide delays in transferring the *interval energy data* to a remote location where access to a *telecommunications network* has been established. Where such delays are approved by the relevant ~~*Metrology Coordinator*~~*Minister*, the approval must be provided as a *jurisdictional policy directive* to *NEMMCO*. The *metrology procedure* ~~is to~~ must record the value of "x" for each jurisdiction, and indicate how *interval energy data* will be established for type 5 *metering installations* in that *participating jurisdiction* during the period of delay.

[The change is a consequence of another change. The note has been revised in accordance with the outcomes of the legal review]

Note 3a: For the purpose of clarification, the clock error for a type 5 *metering installation* may be relaxed ~~by the relevant *Metrology Coordinator*~~ in the *metrology procedure* to accommodate evolving whole-current technologies that are acceptable in accordance with clause 7.13(a).

[The change is a consequence of another change]

Note 3b: The maximum allowable error of a type 5 *metering installation* may be relaxed ~~by the relevant *Metrology Coordinator*~~ in the *metrology procedure* to accommodate evolving technologies providing that such relaxation is consistent with any regulations published under the National Measurement Act.

[The change is in part a consequence of another change. Editorial change due to the removal of italics on National Measurement Act]

Item 34 consistency or wording within the Table 7.2.3.1 notes:

SP AusNet consider the following wording changes are required to ensure consistency of wording between different Notes covering similar matters:

i) Note 2a change "relaxed by NEMMCO" to "relaxed in the *Metrology procedure*" as per Note 3a

ii) Note 3 should generally be very similar to Note 4

Note 3 reads: (Breaks between points inserted by SP AusNet)

A type 5 *metering installation* must comply with the *metrology procedure* when converting *active energy* into *metering data*.

The value of "x" must be determined by the relevant *Minister* and must be provided as a *jurisdictional policy directive* to *NEMMCO*.

The maximum acceptable value of "x" is 750 MWh per annum.

The *metering installation* may provide delays in transferring the *interval energy data* to a remote location where access to a *telecommunications network* has been established.

Where such delays are approved by the relevant *Minister*, the approval must be provided as a *jurisdictional policy directive* to *NEMMCO*.

The *metrology procedure* must record the value of "x" for each jurisdiction, and indicate how *interval energy data* will be established for type 5 *metering installations* in that *participating jurisdiction* during the period of delay.

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Note 4: A *metrology procedure* ~~is to~~ must be prepared and ~~approved~~ *published* by ~~the relevant *Metrology Coordinator*~~ *NEMMCO* for the purpose of converting *active energy* into *metering data*. The value of "y" ~~is to~~must be determined by the relevant ~~*Metrology Coordinator*~~*Minister* and must be provided as a *jurisdictional policy directive* to *NEMMCO*. The maximum acceptable value of "y" is 750 MWh per annum. This *metering installation* type provides for *accumulated energy data* to be transferred to a remote location where access to a *telecommunication network* has been established. The *metrology procedure* ~~is to~~ must record the value of "y" for each *participating jurisdiction*, and identify the method by which *accumulated energy data* is to be converted into *trading interval* data in accordance with clause 7.9.3(b), and the method by which *estimated energy data* is to be prepared during the period when the *accumulated energy data* is not available. Devices within the *metering installation* may provide *accumulated energy data* in pre-determined *daily* time periods where such time periods are contained in the ~~applicable~~ *metrology procedur*e.

34ii)

[The change is a consequence of another change]

Note 4a: Any relevant clock errors for a type ~~6~~ *metering installation* are to be established in the *metrology procedure*.

34iii)

Note 4b: The maximum allowable error of a type 6 *metering installation* may be relaxed by ~~the relevant *Metrology Coordinator*~~*NEMMCO* providing that such relaxation is consistent with any regulations published under the National Measurement Act.

[The change is in part a consequence of another change. Editorial change due to the removal of italics on National Measurement Act]

Note 5: A type 7 *metering installation* applies to the condition where it has been agreed between the relevant ~~*Metrology Coordinator*~~*Minister* and *NEMMCO* that a *metering installation* does not require a *meter* to measure the flow of electricity in a power conductor and accordingly there is a requirement to determine by other means the *energy data* that is deemed to flow in the power conductor. This condition will only be allowed for a *market load* that is supplied with electricity and has a load pattern which is the same as or similar to one of the following arrangements:

[The change is a consequence of another change]

(a) street, traffic, park, community, security lighting;
(b) traffic parking meters, community watering systems;
(c) special telephone service requirements;
(d) devices requiring minuscule loads.

The *metrology procedure* must include each *market load* arrangement that has been classified as a type 7 *metering installation*.

Note 6: The accuracy of the *estimated energy data* is to be in accordance with approved techniques for determining the flow of electricity in power conductors. The techniques, including algorithms, are to be included in the *metrology procedure*.

Note 4 with SP AusNet suggested changes to align with Note 3 reads:

~~A *metrology procedure* must be prepared and *published* by *NEMMCO* for the purpose of converting *active energy* into *metering data*.~~
A type 5 *metering installation* must comply with the *metrology procedure* when converting *active energy* into *metering data*.

The value of "y" must be determined by the relevant *Minister* and must be provided as a *jurisdictional policy directive* to *NEMMCO*.

The maximum acceptable value of "y" is 750 MWh per annum.

~~This *metering installation* type provides for *accumulated energy data* to be transferred to a remote location where access to a *telecommunication network* has been established.~~
The *metering installation* may provide delays in transferring the *accumulated energy data* to a remote location where access to a *telecommunication network* has been established.

Where such delays are approved by the relevant *Minister*, the approval must be provided as a *jurisdictional policy directive* to *NEMMCO*.

The *metrology procedure* must record the value of "y" for each *participating jurisdiction*, and identify the method by which *accumulated energy data* is to be converted into *trading interval* data in accordance with clause 7.9.3(b), and ~~the method by which *estimated energy data* is to be prepared during the period when the *accumulated energy data* is not available.~~ indicate how accumulated *energy data* will be established for type 6 *metering installations* in that *participating jurisdiction* during the period of delay.

Devices within the *metering installation* may provide *accumulated energy data* in pre-determined *daily* time periods where such time periods are contained in the *metrology procedure*.

iii) Note 4b change "relaxed by NEMMCO" to "relaxed in the *Metrology procedure*" as per Note 3b

Item 35 Table 7.2.3.1 Note 6

Note 6 appears to assume that the calculated energy data from a type 7 installation is *estimated energy data* whereas the definition of *estimated energy data* in Chapter 10 appears to specifically rule out estimates being applicable to type 6 non-metered connection points.

> estimated energy data
>
> The data that results from an estimation of the flow of electricity in a power conductor where the data applies to a *trading interval* or a period in excess of a *trading interval*. The estimation is made in relation to a *market load* and would not apply to a *metering point* where *accumulated energy data* or *interval energy data* is not available, or a *non-metered connection point*.

What is the correct situation?

Page 61, 62	No comments

(e) The physical arrangement of partial *check metering* shall be agreed between the *responsible person* and *NEMMCO*.

(f) *Check metering installations* may be supplied from secondary circuits used for other purposes and may have a lower level of accuracy than the *revenue metering installation*, but must not exceed twice the level prescribed for the *revenue metering installation*.

S7.2.5. Resolution and accuracy of displayed or captured data{ XE "data" }

36

Any programmable settings available within a *metering installation*, *data logger* or any peripheral device, which may affect the resolution of displayed or stored data, must meet the relevant requirements of AS 1284 or IEC 1036 and must comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National ~~Standards Commission~~ Measurement Institute under the National Measurement Act 1960 (Cth).

[Editorial change. Change of name for the National Standards Commission. Removal of italics for National Measurement Act]

S7.2.6. General design standards

S7.2.6.1 Design requirements{ XE "design" }

Without limiting the scope of detailed design, the following requirements must be incorporated in the design of each *metering installation*:

(a) For *metering installations* greater than 1000 GWh pa per *metering point*, the *current transformer* core and secondary wiring associated with the *revenue meter*, shall not be used for any other purpose unless otherwise agreed by *NEMMCO*.

(b) For *metering installations* less than 1000 GWh pa per *metering point* the *current transformer* core and secondary wiring associated with the *revenue meter* may be used for other purposes (e.g. local *metering* or protection) provided the *responsible person* demonstrates to the satisfaction of *NEMMCO* that the accuracy of the *metering installation* is not compromised and suitable procedures/measures are in place to protect the security of the *metering installation*.

(c) Where a *voltage transformer* is required, if separate secondary windings are not provided, then the *voltage* supply to each *metering installation* must be separately fused and located in an accessible position as near as practical to the *voltage transformer* secondary winding.

(d) Secondary wiring must be by the most direct route and the number of terminations and links must be kept to a minimum.

(e) The incidence and magnitude of burden changes on any secondary winding supplying the *metering installation* must be kept to a minimum.

Item 36 S7.2.5 and other clauses

The New *Rules* uses the reference to AS 1284 for a number of matters whereas it would appear that a new series of Australian Standards are now applicable to some aspects of some meters. Should the reference be changed?

P64, 65, 66

No comments

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Table S7.3.1 Maximum Allowable Level of Testing Uncertainty (±)

{ XE "Table 1 Maximum Allowable Level of Testing Uncertainty (±)" }

37

Description		Metering Installation Type				
		Type 1	Type 2	Type 3	Type 4	Type 5 & 6
In Laboratory	CTs / VTs	0.05%	0.1%	0.1%	0.1%	0.1%
	Meters Wh	0.05/cosϕ%	0.1/cosϕ%	0.2/cosϕ%	0.2/cosϕ%	0.3/cosϕ%
	Meters varh	0.2/sinϕ%	0.3/sinϕ%	0.4/sinϕ%		N/A
In Field	CTs / VTs	0.1%	0.2%	0.2%	0.2%	0.2%
	Meters Wh	0.1/cosϕ%	0.2/cosϕ%	0.3/cosϕ%	0.3/cosϕ%	0.3/cosϕ%
	Meters varh	0.3/sinϕ%	0.4/sinϕ%	0.5/sinϕ%		N/A

Table S7.3.2 Maximum Period Between Tests

{ XE "Table 2 Maximum Period Between Tests" }

Description	Metering Installation Type				
	Type 1	Type 2	Type 3	Type 4	Types 5 & 6
CT	10 years	10 years	10 years	10 years	10 years
VT	10 years	10 years	10 years		N/A
Burden tests	When meters are tested or when changes are made				
CT connected Meter (electronic)	5 years	5 years	5 years	5 years	5 years
CT connected Meter (induction)	2.5 years	2.5 years	5 years	5 years	5 years
Whole-current (Direct Connected Meter)	The testing and inspection requirements must be by an asset management strategy. Guidelines for the development of the asset management strategy must be recorded in ~~a~~ the *metrology procedure*.				

Item 37 Table S7.3.1

As stated in Item 33 SP AusNet would expect that the type 4 and type 5 meter specs would fundamentally be the same: SP AusNet therefore cannot understand the difference in this table for one parameter.

Page 68	No comments

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Schedule 7.4 - Metering Provider

S7.4.1 General

(a) A *Metering Provider* must be accredited by and registered by *NEMMCO*. *NEMMCO* must accredit and register a *Metering Provider* only for the type of work the *Metering Provider* is qualified to provide.

(b) *NEMMCO* must establish a qualification process for *Metering Providers* that enables registration to be achieved in accordance with the requirements of this schedule 7.4.

(c) [Deleted]

(d) A *Metering Provider* must have the necessary licenses in accordance with appropriate State and Territory requirements.

(e) A *Metering Provider* must ensure that any *metering* equipment they install is suitable for the range of operating conditions to which it will be exposed (e.g. temperature; impulse levels), and operates within the defined limits for that equipment.

(f) A *Metering Provider* must ensure that the *metering installation* is installed and maintained in accordance with ~~a relevant~~ the *metrology procedure* ~~that has been established by either *NEMMCO* or the *Metrology Coordinator*~~.

[The change is a consequence of another change]

S7.4.2 Categories of registration

(a) Registrations, in relation to *metering installation* types 1, 2, 3 and 4, must be categorised in accordance with Tables S7.4.1, S7.4.2 and S7.4.3 or other procedures approved by *NEMMCO*;

38 (b) In relation to *metering installation* types 5, 6 and 7, *NEMMCO* must establish categories of registration which are consistent with the service requirements established in the ~~relevant~~ *metrology procedures*~~.~~;

[The change is a consequence of another change]

39 (c) *NEMMCO* may establish an Accredited Service Provider category of registration for a *Metering Provider* in accordance with clause S7.4.5;

[Clause S7.4.2(c) has been introduced specifically to facilitate the development of accreditation for the NSW ASP scheme, but is generic enough to be applied to all jurisdictions if appropriate]

Table S7.4.1 Categories of registration for accreditation

{ XE "Table 1 Categories of registration" }

Category	Competency
1C	Class 0.2 CTs with < 0.1% uncertainty.
1V	Class 0.2 VTs with < 0.1% uncertainty.

Item 38 S7.4.2(b)

SP AusNet as outlined in Item 20 are unclear how the accreditation and registration process for *Metering provider*s will recognise the different service levels associated with the differences between type 4A and type 4B metering installations.

Further the different service levels associated with the differences between type 4A and type 4B metering installations potentially introduces a variation in the capability of MDAs in dealing with:

- Relatively limited number of type 4A metering installations but with daily prudential delivery to NEMMCO and market settlement timeframe data delivery (current accreditation)
- Mass numbers of type 4B metering installations but without daily prudential delivery to NEMMCO and with forward estimates (plus NSRD handling etc) in lieu of actual data delivery for the early settlements

This would appear to require a new Category 4N (or 4MB or ?) to be added to Table S7.4.2

Item 39 S7.4.2(c)

As a Victorian LNSP, SP AusNet does not have experience of working with ASPs however SP AusNet assess that there are some inconsistencies in the various wording related to ASPs.

SP AusNet's understanding is that an ASP is (or will be once the national *Metrology procedure* becomes effective) by definition a metering service provider with an accreditation of *Metering provider* Category 5A or Category 6A.

The major (only?) difference would appear to be that the ASP can be contracted by other than the RP as allowed under this clause (7.2.1(c)(2))

Does it warrant inclusion of a separate category?

Refer also to SP AusNet comments on clause 7.2.1 in Items 4, 5, 6

P70, 71, 72,	No comments

(4) a knowledge and understanding of the appropriate standards and guides, including those in the *Rules*.

S7.4.4 Capabilities of Metering Providers for metering installations types 5, 6 and 7{ XE "Metering Register" }

Metering Providers, who apply for categories of *Metering Provider* accreditation of *metering installations* types 5, 6 and / or 7, must be able to exhibit, to the reasonable satisfaction of *NEMMCO*:

(a) all of the capabilities relevant to that type of *metering installation* which are included in clause S7.4.3;

(b) any relevant capabilities required for data processing specified in the ~~relevant~~ *metrology procedure*; and

(c) an acceptable standard of performance determined by reference to the ~~relevant~~ *metrology procedure* for each of the processes and devices identified in the ~~relevant~~ *metrology procedure*.

[The change is a consequence of another change]

S7.4.5 Capabilities of Accredited Service Provider 40

(a) A *Metering Provider* who is registered ~~in the category~~ of Accredited Service Provider may only perform work on a type 5 or type 6 *metering installation* for the purpose of installing that *metering installation*;

(b) *NEMMCO* must include the Accredited Service Provider category in the accreditation guidelines prepared and *published* under clause 7.4.2(ba);

(c) *NEMMCO* may determine the competencies of a *Metering Provider* registered in the category of an Accredited Service Provider;

(d) *NEMMCO* may determine different Accredited Service Provider competencies for each *participating jurisdiction*;

(e) The Accredited Service Provider competencies determined under clause S7.4.5(c) must be consistent with the service requirements established in the *metrology procedure* in respect of the work to be performed under clause S7.4.5(a).

[Clause S7.4.5 has been introduced to list the principles that will govern the registration of a Metering Provider in the category of ASP. This clause should be read in conjunction with clauses S7.4.1(b), and 7.4.2(ba) regarding the establishment of an accreditation process]

Item 40 S7.4.5

The ASP would also apply to the new mass type 4B metering installations.

For further SP AusNet comments on ASP inclusion in the New *Rules* refer other comments on clause S7.4.2(c) in Item 39 and on clause 7.2.1 in Items 4, 5, 6

Page 74, 75	No comments.