

AEMC Rule reference	ENERGEX comment
7.2.3(d) - (h)	<p>These clauses do not represent actual practice. ENERGEX notes the AEMC's comment that 'the LSNP should only be requested to provide the deemed service to a party who specifically requests that service, and for which the LNSP must respond with an offer to enable the relationship to be commercially executed'.</p> <p>ENERGEX believes that valuable resources would be wasted implementing a formal request/accept process when industry participants currently act in a manner that achieves the same result (ie the LNSP acts as the Responsible Person for all type 5, 6 and 7 metering installations) without this formal process.</p>
7.2.3(h)(2)	<p>This clause refers to a connection agreement that exists between the LNSP and Market Participant (which would be the relevant FRMP) as established under rule 5.3.7. Rule 5.3.7 requires a connection enquiry process to have been followed prior to the entry into a connection agreement.</p> <p>ENERGEX and retailers will not engage in this formal process and therefore there will be no connection agreement made in accordance with rule 5.3.7. Rather, ENERGEX will have a connection contract with each customer who is connected to and supplied from ENERGEX's distribution network. This connection contract will, in most cases, be deemed to exist between ENERGEX and the customer and does not require the customer's signature.</p> <p>As there is no entry into a connection agreement under Rule 5.3.7, it is not possible for the LNSP to know when the 10 business day count commences.</p>
7.2.5(b)	<p>This clause currently requires the Responsible Person to enter into an agreement with the Metering Provider it has engaged. For type 5, 6 and 7 metering installations where the LNSP is both the Responsible Person and the Metering Provider, this clause is redundant.</p>
7.2.5(e)	<p>The MSATS Procedure: CATS Procedure v 2.6 currently states that all updates to NMI master records are deemed to occur at 00:00 on the day of effect. ENERGEX believes that any change to this procedure (for example, specifying the responsible person role for part periods within a day) may result in costly system changes.</p>

AEMC Rule reference	ENERGEX comment
7.3.4(e) - (i)	<p>ENERGEX believes this clause needs to be split into two sections: one dealing with the retailers' right to upgrade a type 5 or 6 metering installation with communication equipment such that it becomes a type 1 - 4 installation for which the retailer will be the Responsible Person; and one dealing with the LNSP's right to add communication equipment to an existing type 5 or 6 metering installation without affecting the type 5 or 6 status, and hence retaining the LNSP as the Responsible Person. The recommended changes are as follows:</p> <p>(e) Subject to the <i>metrology procedure</i> and this clause 7.3.4, a <i>financially responsible Market Participant</i> may make arrangements to alter a type 5, 6 or 7 metering installation to make the installation capable of remote acquisition.</p> <p>(f) A <i>financially responsible Market Participant</i> who is not the <i>responsible person</i> for a type 5, 6 or 7 <i>metering installation</i> that is to be altered under paragraph (e), must:</p> <p>(1) not alter the <i>metering installation</i> until the transfer of the relevant <i>market load</i> has been effected by <i>NEMMCO</i> in accordance with <i>the Market Settlement and Transfer Solution Procedures</i>; and</p> <p>(2) advise the <i>responsible person</i> of the proposed date of alteration at such a time that:</p> <p>(i) is prior to that alteration being made; and</p> <p>(ii) is in accordance with any time specified in the <i>Market Settlement and Transfer Solution Procedures</i>.</p> <p>(g) Alterations to types 5, 6 or 7 <i>metering installations</i> will not alter the classification of those <i>metering installations</i> where the <i>Local Network Service Provider</i> decides on reasonable grounds that operational difficulties require the <i>metering installation</i> to be capable of remote acquisition.</p> <p>(h) For the purposes of paragraph (g), operational difficulties may include locational difficulties where the metering installation is:</p> <p>(1) at a site where access is difficult; or</p> <p>(2) on a remote rural property.</p>
7.3.6(g)(3)	<p>ENERGEX believes the reference in this clause to 'is' should be changed to 'was' and additional words added:</p> <p>(3) the <i>Local Network Service Provider</i> was the <i>responsible person</i> for that <i>metering installation</i> prior to the alteration being made.</p> <p>This change is desirable as it reflects the fact that the change to the metering installation made by the financially responsible market participant will cause a new Responsible Person to be appointed. The LNSP is no longer the Responsible Person once the change is made.</p>