

# **SP AusNet Submission Draft Decision re Proposed National Electricity Amendment (Integration of NEM Metrology Requirements) Rule 2007**



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SP AusNet submits these comments to the AEMC in response to the Commission's Draft Decision re the Proposed National Electricity Amendment (Integration of NEM Metrology Requirements) Rule 2007.

However, before providing comments on the detailed drafting for the Rules contained in the Draft Determination we wish to comment regarding the process that has led to the current drafting. This is because we consider that a number of the Commission's changes from the drafting first proposed, including structural changes and amended emphasis in some areas, is really not warranted. In many cases we consider these changes do not improve, or even reduce the clarity of the Rules for the parties who must comply with them, and/or change the intent, and in our view with no observable benefit.

The drafting initially proposed in the Rule Change Proposal was prepared in consultation with an industry working group, the Metrology Working Group, and the structure and terminology considered at length, and supported by this group. We acknowledge that this should not preclude the AEMC from recasting the drafting, however there is the risk of re-interpretation of intent, and some of the specific comments we make in this submission deal with instances where we believe this may be the case.

We also wish to note that we have found some difficulty in correlating the explanation in the Draft Determination, the draft Rules and the original drafting proposed in the Rules Change Proposal. It would be helpful for stakeholder analysis of the draft decision if cross-referencing between the documents was enhanced.

SP AusNet assess that the process and documentation for this round of Chapter 7 changes has been more effective than that used for the changes in 2006, and SP AusNet and the industry have some suggestions as to how the process can be further improved to make it more effective and efficient not only for the industry but also for the Commission.

We would like to be part of the process of working with the Commission to consider these suggestions and where appropriate put process improvement in place.

Finally, we consider that the success in establishing clearer and simpler metrology arrangements will depend on associated changes in the jurisdictional metrology documents. The risk otherwise is that the metrology arrangements will instead become more complicated and uncertain. SP AusNet intends to approach the ESC with these concerns, however we believe it would also be useful for the AEMC to engage with jurisdictional regulators to determine the impact of jurisdictional arrangements on the implementation of these Rules changes.

SP AusNet consider that there are a number of aspects of Chapter, not covered by this consultation, where to varying degrees the Rules do not provide clear and effective support to industry metrology. We raised a number of these in our submission on the previous Chapter 7 changes in 2006. This current submission includes comments on some of these outstanding matters where they impact on Clauses proposed for revision under this package of changes. We acknowledge that the remainder are out of scope for this change package, although we believe they should remain open.

## SP AusNet Comments Against Rule Change Proposals

We have submitted our detailed comments on specific clauses in the form of the following table to simplify the AEMC's work in analysing our submission and the wording changes we have suggested.

The table treats each Proposal in numerical order and includes immediately following each proposal, additional comments where appropriate on specific Rules clauses impacted by the proposal.

We have categorised these comments as follows:

- A** Agreement with AEMC proposal
- L** Only of minor impact on clarity and understanding. Generally wording, typos, incorrect italics, etc  
No business impact
- M** Moderate impact or risk of potential impact. Range from an internal inconsistency in the Rules which may have the potential for lack of clarity and interpretational issues, to matters which are unclear to the point of not being consistent with desired or benchmark practice.  
Some business impact possible to likely.
- H** High impact or risk of potential impact. Matters of serious concern with respect to regulatory uncertainty and/or strong potential to impact current practice. Includes matters which appear counter to fundamental regulatory regime and documentation principles.  
Business impact likely and could be significant.

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1.	#1	A		
2.	#2 Grandfathering of 1 <sup>st</sup> tier	M	<p>When the industry drafted the grandfathering clause we considered that there was no risk that the Jurisdictional regulators would “lose” the jurisdictional metrology documents. We considered that these would continue to be available in a rigorous way. However if the AEMC considers that this is NOT the case then on this basis we understand the need for other arrangements.</p> <p>However we do NOT consider that incorporating these in the Metrology Procedure is appropriate. The Metrology Procedure is a working document used as the basis of day to day metrology arrangements often in hard copy and to expand its size by inclusion of the series of current jurisdictional metrology documents would make this difficult because of the shear volume.</p>	We suggest that the Rules in Chapter 11 include an obligation for NEMMCO to archive the jurisdictional metrology documents on their web site rather than include in the Metrology Procedure .
3.	#2	L	<b>Requested Comment:</b> Grandfathering Date.	We consider that although the effective date for grandfathering does NOT require a lead time (compared with other changes which require a period to implement), the setting of a grandfathering date aligning with the effective date of the other obligations in the Metrology Procedure is simpler and a miniscule risk as no Participant would reasonably purchase equipment to the current Jurisdictional documents between now and 1 July 2008.
4.	#2	M	<b>Requested Comment:</b> Transitional Arrangements for Currently Non Compliant	We do not consider that a transitional arrangement is required for this situation as no installation should be currently non compliant. If a current installation had escaped industry and audit oversight and it was non

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				compliant, then it would not fulfil the requirements of Clause 11.X.3 (a) and hence under Clause 11.X.3 (b) would need to be repaired or replaced in accordance with the Rules. Timeframe for repair would be set by Clause 7.11.2
5.	#2	M	<b>Requested Comment:</b> Transitional Arrangements for Non Complaint with these New Rules	SP AusNet consider that to move down this path of sunseting this grandfathering would create a dangerous and unwarranted precedent. We consider that the Jurisdictional metrology documents have provided a good basis for metrology, and the changes in this version of the Metrology Procedure are closely matched to these Jurisdictional documents. Hence there is absolutely minimum to be gained with respect to metrology accuracy, and significant costs, in “forcing” current installations to align in detail with this Metrology Procedure at a future point in time.
6.	#2	L	We do not consider that moving the Metrology grandfathering to Chapter 11 is in the best interests of presenting Participants, including service providers, with a succinct view of metrology obligations. As discussed in our item 5 above we consider that this grandfathering should not sunset and hence will be in place for the life of metering equipment; which with respect to CTs could be many tens of years.	Leave in Chapter 7 as is not transitional in the same manner as other items in Chapter 11.
7.	#3 RP election variations	M	SP AusNet are happy that the messy wording which was proposed by NEMMCO/industry to enable the SA and Victorian exceptions re type 5, 6 responsibility, which drew so much comment, can be removed.  However we are disappointed that these changes to the	

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			Jurisdictional positions were not established earlier in this Rules change process. It is of concern that Jurisdictions, despite being the key instigator of Metrology Harmonisation thru the JRR, were slow in eliminating these Rules exceptions.	
8.	#3	M	<b>Requested Comment:</b> Grandfathering of Responsible Person arrangements for >160MWh type 5/6 sites.	<p>The AEMC determination states that there are ~150 sites &gt;160MWh with type 5/6 and the Responsible Person =FRMP. NEMMCO have advised that there are also 2000-3000 sites &gt;160MWh with type 5/6 and the Responsible Person =LNSP.</p> <p>The impact of these groups remaining as type 5/6 is:</p> <ul style="list-style-type: none"> <li>• if type 5; on the earlier settlement runs because of late interval data delivery and</li> <li>• if type 6; on the accuracy of the profile for all settlements.</li> </ul> <p>This is a Retailer issue and requires sizing by Retailers. SP AusNet have no comment on whether a transitional date should be established.</p>
9.	7.2.2 (b) Was SP AusNet # 3 AEMC position not clear	L	<p>If under clause 7.2.4 the installation is a “shared metering installation” then a party other than the Market Participant (the Retailer) may be the RP.</p> <p>If addition is not made to current wording this exception could be overlooked.</p>	<p>(b) A <i>Market Participant</i> is the <i>responsible person</i> for a type 1, 2, 3 or 4 <i>metering installation</i>, if: .....</p> <p><u>(3) the metering point is part of a shared joint metering installation and under clause 7.2.4 it has been agreed the Market Participant is the responsible person or the Market Participant is nominated by NEMMCO.</u></p>

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10.	7.2.3 (a) Was SP AusNet # 4 AEMC position not clear	L	It would appear that this clause which is considering the <u>responsibility of the LNSP</u> should not be subject to clause 7.2.4 because that clause does not contemplate the LNSP being nominated by NEMMCO, only one of the FRMPs.	<b>7.2.3 Responsibility of the Local Network Service Provider</b> (a) <del>Subject to the requirements relating to joint metering installations clause 7.2.4,</del> The <i>Local Network Service Provider</i> is the <i>responsible person</i> for:
11.	#4 Different meter type	M	<p>The intent of the industry/NEMMCO proposed wording in 7.2.4 (j) has been incorrectly translated into the revised 7.3.1(c).</p> <p>7.2.4 (j) read:</p> <p>Subject to clause 7.2.5(d), where the <i>Market Participant</i> cannot be the <i>responsible person</i> for a <i>metering installation</i>, the <i>Local Network Service Provider</i> must not unreasonably withhold its consent to a <i>Market Participant's</i> request to install a <i>metering installation</i> of a type that is different from that already installed, or that provides facilities in addition to that which the <i>Local Network Service Provider</i> otherwise would install, in accordance with the <i>metrology procedure</i>.</p> <p>The intent translated from the Jurisdictional Codes was to give the Retailer the ability to have the LNSP install a type 5 or 6 meter other than the “base” level meters used by the LNSP for an installation with the parameters involved. It was not necessarily to get additional “features” above those in 7.3.1(a).</p>	<p>Reinsert wording as per 7.2.4 (j) with minor rewording as proposed by SP AusNet to:</p> <ul style="list-style-type: none"> <li>make it clear and that this should be on the basis of the relationship being a commercial one with respect to the increment over and above the base level meter regulated price. Whereas the clauses (ca) to (j) define a process for type 5/6 meters which requires a fair and reasonable offer, it is unclear what the financial basis of the arrangement is for the non standard meters the LNSP must install under a request under this Clause.</li> <li>Remove the risk, there in the originally proposed NEMMCO/industry wording, that it could be taken incorrectly to mean that Market Participant would install the non standard metering installation.</li> </ul> <p>Subject to clause 7.2.5(d), where the <i>Market Participant</i> cannot be the <i>responsible person</i> for a <i>metering installation</i>, the <i>Local Network Service Provider</i> must not unreasonably <del>refuse withhold its consent to</del> a <i>Market Participant's</i> request <u>for the <i>Local Network Service Provider</i> to install at a fair and reasonable charge</u> a <i>metering installation</i> of a type that is different from that already installed, or that provides facilities in addition to that which the <i>Local Network Service Provider</i> otherwise would</p>

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				install, in accordance with the <i>metrology procedure</i>
12.	#5 Rollover limitation	M	<p>The intent of the industry/NEMMCO proposed wording in 7.3.1 (a)(11b) has been incorrectly translated into 7.3.1(a)(14).</p> <p>The intent of the industry/NEMMCO proposed wording translated from the Jurisdictional Codes, was to ensure that the dial of a type 6 meter at an installation did not roll over within a 12 months period, hence protecting against a rollover being “missed” if it happened frequently.</p>	Reinsert wording as per 7.3.1 (a)(11b)
13.	#6 losses	M	<p>For the <u>majority</u> of metering installations the metering point and the connection point do not correspond exactly and hence there will always be losses between the metering point and the connection point. Therefore this clause in the existing Rules requires a tripartite agreement re the adjusting of metering data <u>for almost all installations</u>. This is a obviously an unworkable requirement if taken by “regulators” as literal requirement. The elimination of this uncertainty was the aim of the NEMMCO/industry drafted words.</p> <p>Refer SP AusNet original submission item # 13 for our view of a potential approach.</p>	However if AEMC agrees that the words are OK, and NEMMCO (and the AER) agree that the current wording will not be literally interpreted, then SP AusNet accept the Commission view that the Clause remains as is.
14.	#7 Non market generators	M	The only significant content change proposed by the Commission would appear to be with respect to the accuracy of metering for generators greater than 1MW. The NEMMCO/industry words based on the Jurisdictional Codes was to require standards	

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			<p>consistent with <i>market generating units</i> (as stated in 7.3.4A (3)), whereas the Commission have determined to refer rather to the metering accuracy specified in schedule 7.2. SP AusNet have not formulated a view on this different approach.</p> <p>However whereas the words as drafted by NEMMCO/industry were relatively clear re the metering requirements, the Commission's wording is unclear in a number of subclauses as detailed below.</p>	<p>Reword as follows:</p>
15.	7.3.1 (i) (3) to (9)	M	<p>(3)(4) Reword to make it clear:</p> <ul style="list-style-type: none"> <li>• it is the CT (or VT) which must be consistent with (i) or (ii) not the whole installation necessarily as implied by the current wording . Wording in (5) is closer to the requirements</li> <li>• clarify intent with respect to type 1 and type 2 metering installations</li> </ul> <p>(5) similar issues as above apply to this sub clause</p>	<p>.....a metering installation .....must:</p> <p>(3) where a <i>current transformer</i> is installed, <u>in relation to the <i>current transformer</i></u>, meet the requirements in Schedule 7.2 for:</p> <p>(i) a type 3 <i>metering installation</i>; or</p> <p>(ii) the type of <i>metering installation</i> appropriate to that <i>connection point</i> <u>where the type is type 1 or 2;</u></p> <p>(4) where a <i>voltage transformer</i> is installed, <u>in relation to the <i>voltage transformer</i></u>, meet the requirements in Schedule 7.2 for:</p> <p>(i) a type 3 <i>metering installation</i>; or</p> <p>(ii) the type of <i>metering installation</i> appropriate to that <i>connection point</i>; <u>where the type is type 1 or 2;</u></p> <p>(5) <del>in relation to the measurement element</del> where a <i>reactive meter</i> is installed, <u>in relation to the <i>reactive measurement element</i></u> meet the requirements in Schedule 7.2 for:</p> <p>(i) a type 3 <i>metering installation</i>; or</p>

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			<p>(6) The Commission in sub clause (9) has changed “output” to “nameplate rating” but has not done so here. Is there a difference in meaning? Also reference to S7.2 should be clearer</p> <p>(7)The Commission in sub clause (9) has changed “output” to “nameplate rating” but has not done so here. Is there a difference in meaning?</p> <p>(8) The Commission in sub clause (9) has changed “output” to “nameplate rating” but has not done so here. Is there a difference in meaning?</p> <p>(9) If the Commission is concerned with the DNSP frivolously requesting reactive measured for small generating units then adding the term “if reasonably required” will not overcome this concern, unless the Commission provides guidance in the Rules with respect to what it would consider to be reasonable. If it is left to the DNSP nothing has changed!</p>	<p>(ii) the type of <i>metering installation</i> appropriate to that <i>connection point</i>; <u>where the type is type 1 or 2</u></p> <p>(6) for units with an <b>output</b> greater than 1 MW, meet: (i) the accuracy requirements specified in schedule 7.2 <u>based on projected sent out annual energy volumes</u>; and (ii) the measurement requirements in paragraph (a)(8);</p> <p>(7) in relation to new accumulation <i>metering equipment</i> for units with an <b>output</b> equal to or less than 1 MW, meet the minimum standards for <i>active energy</i> class 1.0 watt-hour <u>meters</u> or 2.0 watt-hour <i>meters</i> in accordance with Schedule S7.2.6.1(f);</p> <p>(8) for units with an <b>output</b> of 1 MW or less that are capable of recording <i>interval energy</i>, meet the minimum standards of accuracy for the <i>active energy meter</i> in accordance with schedule 7.2 for type 3 or 4 <i>metering installations</i> which is based on projected sent out annual <i>energy volumes</i>; and</p> <p>(9) if reasonably required by the <i>Distribution Network Service Provider</i> (where such a request must be in writing and with reasons), after taking into account the size of the <i>generating unit</i>, its proposed role and its location in the <i>network</i>, have the <i>active energy</i> and <i>reactive energy</i> measured where the unit has a <i>nameplate rating</i> of less than 1 MW.</p>

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16.	#8 Meter test requests	M	<p>The intent of the industry/NEMMCO proposed wording in 7.6.1 has been incorrectly translated into the revised 7.6.1.</p> <p>The industry/NEMMCO wording was attempting to keep a level of end use customer protection similar to that in the Jurisdictional Codes. The retention of NEMMCO carrying out the test was to provide a backstop/default if the Responsible Person refused to carry out the test because they did not view it as a reasonable request. The Commission drafting seems to put NEMMCO in the role of “policeman” forcing the Responsible Person to test. This was not the intent.</p> <p>Reword as below to reinstate this industry intent (and correct other drafting concerns):</p>	
17.	7.6.1	M	(a) reference missing	<p>(a) Testing of a <i>metering installation</i> must be carried out in accordance with:  (1) this clause 7.6.1; and  (2) the inspection and testing requirements set out in schedule <a href="#">7.3</a>.</p> <p>(b) A <i>Registered Participant</i> may request that the <i>responsible person</i> make arrangements for the testing of a <i>metering installation</i> and if the request is reasonable, the <i>responsible person</i> must not refuse the request.</p> <p>(c) Where the <i>responsible person</i> does not undertake the testing requested under paragraph (b), <a href="#">the <i>Registered Participant</i> may</a></p>

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			<p>(h) If the tests are requested by a Retailer (or a customer thru a Retailer) then the result should be delivered to the Retailer even</p>	<p><u>request that NEMMCO make arrangements for the testing of the metering installation and if the request is reasonable, NEMMCO must not refuse the request.</u> <del>NEMMCO must make the arrangements for the testing where reasonable.</del></p> <p>(d) The <i>Registered Participant</i> who requested the tests under paragraph (b) may make a request to the <i>responsible person</i> <u>or NEMMCO</u> to witness the tests.</p> <p>(e) The <i>responsible person</i> <u>or NEMMCO</u> <del>must not refuse for</del> a request received under paragraph (b) <u>or</u> (c) <del>and</del> must no later than 5 <i>business days</i> prior to the testing, advise:</p> <ol style="list-style-type: none"> <li>(1) the party making the request; and</li> <li>(2) where the <i>Local Network Service Provider</i> is the <i>responsible person</i>, the <i>financially responsible Market Participant</i>, of:</li> <li>(3) the location and time of the tests; and</li> <li>(4) the method of testing to be undertaken.</li> </ol> <p>(g) Where <i>NEMMCO</i> or the <i>responsible person</i> has undertaken testing of a <i>metering installation</i> under this clause 7.6.1, the <i>responsible person</i> or <i>NEMMCO</i> (as the case may be) must make the test results available to:</p> <ol style="list-style-type: none"> <li>(1) <i>NEMMCO</i> or the <i>responsible person</i> (depending on which party conducted the tests); and</li> <li>(2) a <i>Registered Participant</i> registered against the <i>connection point</i> in <i>NEMMCO's connection point</i> registration system.</li> </ol> <p>(h) <u>NEMMCO or the responsible person (depending on which party conducted the tests) must;</u></p>

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			<p>if the results are good. The financial arrangement in such a circumstance is that the customer must pay the cost of the test and hence the outcome either way is important.</p> <p><b>SP AusNet note that the financial arrangements of testing where included in the Jurisdictional Codes and the industry proposed to move these details to the Metrology Procedure. The advice regarding the “legal” barrier to the Metrology Procedure containing cost information/obligations has seen these financial arrangements remain in the Jurisdictional Codes despite there being national consistency in approach.</b></p> <p><b>Given the Commission’s view that the costs of meter upgrades should be included in the Rules should this cost matter also be considered for Rules inclusion?</b></p> <p>(i) The audits carried out by NEMMCO are a sample only and hence can only provide a basis for NEMMCO to satisfy itself that there is a reasonable probability that <i>metering installations</i> in general comply, but cannot provide evidence of <u>each</u> installation’s compliance.</p>	<p><u>(1) if the tests are at the request of a <i>Registered Participant</i> make the results available as soon as practicable;</u>  <u>(2) otherwise</u> if the results referred to in paragraph (g) for a <i>metering installation</i> indicate:  (1) deviation from the technical requirements, make the results available as soon as practicable; or  (2) the installation meets the technical requirements, make the results available upon request.</p> <p>(i) <i>NEMMCO</i> must check test results recorded in the <i>metering register</i> by arranging for sufficient audits of <i>metering installations</i> and satisfy itself that the accuracy of <del>each</del> <i>metering installations</i> comply<del>s</del> with the requirements of this Chapter 7.</p>
18.	#9 Record keeping	A	The Commission has largely translated the NEMMCO/industry wording correctly into a revised structure. We note that this wording structure whilst satisfactory is not as user friendly as that proposed. The grouping of obligations by retention period rather than data type is less related to the industry use of the data.	

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19.	7.6.4 (b)	M	Consistent with the NEMMCO/industry view expressed in Proposal #8 that NEMMCO will carry out testing and also with the fact that NEMMCO may do testing as part of its audit processes, NEMMCO needs to have a role in retaining records of testing.	(b) A responsible person <u>and NEMMCO as appropriate</u> must retain records and documentation as follows:
20.	7.9.1 (i)	M	<p><b>Requested Comment:</b> Data records</p> <p>We consider that this clause has a number of issues and complicates, rather than simplifies, the NEMMCO/industry drafted words.</p> <p>As outlined in our comments on 7.9.1 (h) (item 23 in this table) we consider that retention of the use of the term <i>metering installation</i> database is the better approach.</p> <p>NEMMCO (or their agent) is charged with the collection of data from the metering installation (whether from the data logger in a type 4 or the <i>metering installation</i> database in a type 5/6, whereas the clause as drafted implies others could have this role.</p> <p>Further the use of the phrase "...metering data ....stored separately in the form that it was collected...." is not consistent with data terminology as discussed in Proposal #12 and should read "metering data as extracted from the meter but before any changes due to scaling, validation or substitution" as detailed in our comment # 22 on Proposal 12 related clauses below.</p>	<p><del>(i) The person who is required under this Chapter 7 to collect the metering data from the metering installation for the purpose of settlements must ensure the data is stored separately in the form that it was collected for the period of time specified in paragraphs (g) and (h).</del></p> <p>Remove clause and replace with revised (h) and new (i) as recommended in SP AusNet comments against Proposal #12.</p>

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21.	#10 Data access	M	<p>The Commission wording missed a couple of points which were part of the NEMMCO/industry wording. Also the NEMMCO/industry wording in (8) was not entirely consistent with other aspects of the Metrology Procedure.</p> <p>(1) An attempt was made in each subclause to outline the restrictions/controls over the access; hence removed wording should be reinstated</p> <p>(8) The Commission wording is not clear that the “participant” referred to is the FRMP and the last phrase is superfluous as the data involved is defined in the 7.7 (a) lead in.</p>	<p>(1) <i>Registered Participants</i> with a financial interest in the <i>metering installation</i> or the <i>energy</i> measured by that <i>metering installation</i>, <u>and as provided for in the <i>Market Settlement and Transfer Solution Procedures, B2B Procedures and meter churn guidelines</i></u>;</p> <p>(8) A financially <i>responsible Market Participant’s customer</i> upon request to the <u>financially responsible <i>Market Participant</i></u> <del>participant for information relating to that customer’s metering installation.</del></p>
22.	#12 Data terms & databases	M	<p>SP AusNet’s view is that terminology to:</p> <ul style="list-style-type: none"> <li>• provide differentiation with respect to data as it moves thru the end to end data process, or</li> <li>• differentiate the databases thru which it moves,</li> </ul> <p>is a tool to aid drafting and understanding. The differentiation can be provided at any point in the end to end process, however the key requirements with respect to terminology is, that once the point of differentiation is decided it must be used consistently.</p>	

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			<p>At the MRG industry and NEMMCO debated the point of differentiation between <i>energy data</i>, <i>metering data</i>, and <i>settlement ready data</i>. It was agreed that:</p> <p><i>energy data</i> – is data in the meter</p> <p><i>metering data</i> – is data ex the meter up to the point that NEMMCO validates it suitable for settlements, when it becomes <i>settlement ready data</i></p> <p>The Metrology Procedure has now been re-drafted on this basis.</p> <p>There was less finality with respect to debate re the terminology applied to databases. SP AusNet’s view is that the concept of a <i>metering installation</i> database as distinct from the <i>metering database</i> is a useful one which should be continued. Note that the term currently uses the common, broad sense of database which is part of the <i>metering installation</i> rather than a specific Rules definition.</p> <p>However, the counter view which the Commission have argued (at least in some parts of the Determination **), that all databases with <i>metering data</i> should be defined as <i>metering databases</i> is also possibly viable <u>with some changes to the Rules</u>.</p> <p>** Refer Determination Section 4.12.3 p72/73 which states “the Commission notes that the Rules provide NEMMCO and industry scope to identify one or more databases which can be classified as a “<i>metering database</i>” “</p>	

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			<p>SP AusNet consider that is not the case unless the definition of <i>metering database</i> is changed because currently it is restricted to a database “maintained and administered by <i>NEMMCO</i>” and containing “<i>settlements ready data</i>” as per the definition below. The <i>metering installation</i> database established and maintained by the RP using an MDP and containing only <i>metering data</i> does not meet this definition.</p> <p><b>metering database</b> A database of <i>metering data</i> and <i>settlements ready data</i> maintained and administered by <i>NEMMCO</i> in accordance with clause 7.9.</p> <p>However whichever is adopted it must be consistently applied. The existing and new wording in Chapter 7 does NOT use the terms consistently.</p>	<p>To use the term <i>metering database</i> in a broader sense, as well as the <i>metering database</i> definition being revised, a number of clauses in section 7.9.1 would require to be revised as they make reference to only <i>NEMMCO</i> having a <i>metering database</i>, including (b) which is about “the” <i>metering database</i>; and (c) which requires electronic access which is not available into the database maintained by the Responsible Person.</p> <p>Conversely however, some aspects of 7.9.1 do not support the alternate approach of the using the term <i>metering installation</i> database including (d): as <i>NEMMCO</i> <i>metering database</i> will NOT include “original energy readings” as for types 5 and 6 meters this will be in the <i>metering installation</i> database</p> <p>Note: the term “original energy readings” is not consistent with the data terminology adopted and the equivalent new term would be “metering data as extracted from the meter but before any changes due to scaling, validation or substitution”</p> <p>SP AusNet have not attempted to draft the specific clause changes but having opening the issue of the database definition and terminologies, it is appropriate for the Commission to attempt to rationalise the terminology in <u>all clauses</u>.</p> <p>SP AusNet make the comments below against the clauses revised or added by the Commission in the current Determination.</p>

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23.	7.9.1 (h)	M	Based on the above SP AusNet view of the retention of the concept of a <i>metering installation</i> database, we consider that the two clauses as drafted by NEMMCO/industry should be reinstated as 7.9.1 (h) and (i) with minor correction of terminology in (i)	<p>(f) The <i>metering database</i> must contain historical data that is: In respect of any type 1, type 2, type 3 or type 4 <i>metering installation</i>, the <i>metering database</i> must contain <i>metering data</i> that is:</p> <p>(1) held on line for 13 months in accessible format; and (2) held for a further 5 years and 11 months in archive in a form that is accessible independently of the format in which the data is stored.</p> <p>(g) In respect of a type 5, type 6 or type 7 <i>metering installation</i>, the <i>metering installation <del>database</del> database</i> must contain <i>metering data</i> that is:</p> <p>(1) held online for 13 months in accessible format; and (2) held for a further period of 5 years and 11 months in archive in a form that is accessible independently of the format in which the data is stored.</p>
24.	7.8.4 (a)	L	Under revised definition of <i>energy data</i> additional wording is superfluous	(a) The <del>original-stored</del> <i>energy data</i> in a <i>meter</i> must not be altered except when the <i>meter</i> is reset to zero as part of a repair or reprogramming.
25.	7.8.4 (b)	M	Terminology and clarity issues in particular to ensure that the Responsible Person's scope to change data is clear with respect to differentiation between a type 1-4 and a type 5,6 installation. le the Responsible Person can ensure that is changes in the <i>metering installation</i> database but can only advise NEMMCO or its MDA of the need to change the <i>metering database</i> .	<p>(b) If an on-site test of a <i>metering installation</i> requires the injection of current, the <i>responsible person</i> must ensure that <u>either</u></p> <p><u>(1) for a type 5 or type 6 installation:</u></p> <p>(A+) the <del>metering energy</del> <i>data</i> stored in the <i>metering installation database</i> is inspected and</p> <p>(B2) .....that the <i>metering installation</i> database is altered</p>

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				<p>in accordance with the validation, substitution and estimation procedures in the <i>metrology procedure</i> to ensure that the <i>metering data</i> in the <i>metering installation</i> database is not materially different from the <u>load</u> energy volumes flowing through the <u>connection point</u> during the period of the test</p> <p><u>(2) for a type 1-4 installation:</u>  <u>Details are passed to NEMMCO or NEMMCO's agent to enable the metering database to be altered in accordance with the validation, substitution and estimation procedures in the metrology procedure to ensure that the metering data in the metering database is not materially different from the load energy volumes flowing through the connection point during the period of the test</u></p>
26.	#13 Meter faults	A		
27.	7.11.2	L	In reformatting the industry/NEMMCO proposed wording in 7.11.2 the Commission has missed some words.	<p>(1) a type 1, 2 and 3 <i>metering installation</i>, if a malfunction occurs to the <u>metering installation</u>, repairs must be made <u>.....</u></p> <p>(2) a <i>metering installation</i> other than the <u>metering installations</u> referred to in subparagraph (1), if a malfunction occurs to the installation, repairs</p>
28.	#14 Seals	A		
29.	7.8.1	M	<p>In our original submission #24 we wrote:</p> <p>The most likely party to detect a broken seal is a Metering Provider during a routine or special read, and the industry</p>	<p>(c) If a <i>Local Network Service Provider</i>, <i>financially responsible Market Participant</i>, or <i>Metering Provider</i> discovers that a seal protecting <i>metering</i> equipment has been broken, it must notify the <i>responsible person</i> within 5 business days.</p>

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			<p>practice would be for the Metering Provider to record that detail, assess for signs of tampering, and repair the seal.</p> <p>This existing practice provides an effective and efficient arrangement whilst maintaining a high level of control and scrutiny of possible meter tamper situations.</p> <p>The need to report this to the Responsible Person where tamper is not suspected would appear to add complication and costs without improving the security of installations.</p> <p>The proposed Commission wording whilst better than that originally drafted still does not reflect this practical process.</p> <p>Plus the obligation on the Responsible Person should be to ensure actions generally not to carry out the actions.</p>	<p><u>(ca) Where a <i>Metering Provider</i> appointed by the Responsible Person discovers that a seal protecting metering equipment has been broken, and the <i>Metering Provider</i> has the delegated authority of the Responsible Person to assess for tampering, the <i>Metering Provider</i> may replace the seal when it is discovered without notice to the Responsible Person subject to meeting requirements of paragraph (f).</u></p> <p>(d) If a broken seal has not been replaced by the person who notified the <i>responsible person</i> under paragraph (c), the <i>responsible person</i> must <u>ensure that <del>replace</del> the broken seal is replaced</u> no later than: .....</p>
30.	#15 Type 7	M	Refer specific comments below	
31.	S7.2.3 Table 7.2.3.1 Item 5	M	<p>In our original submission #28 we wrote: We understand and support that the role of NEMMCO is to determine where a “category” of metering installation in general meets the conditions to be considered an un-metered load and so classify that category as type 7.</p>	<p>(a) A type 7 <i>metering installation</i> classification applies where a <u>generic grouping of (or maybe category of) metering installations</u> does not require a <i>meter</i> to measure the flow of electricity in a power conductor and accordingly there is a requirement to determine by</p>

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			<p>However we understand that NEMMCO will not ascertain whether <u>every</u> installation within the category meets the conditions. Hence although because of typical magnitude and/or connection arrangements NEMMCO might classify a category of installation as type 7, the Responsible Person (ie the LNSP) may determine that a specific installation in that category does not meet the conditions. Eg the load may be larger than typical and/or it may be located such that providing a meter is lower than average cost.</p> <p>The Commission rejected our use of the term “category”. The concept of a category being declared a type 7 is defined in the Metrology Procedure which in Clause 14.2.2 of Part B states “the agreed market load that is published by NEMMCO will be generic in nature (eg “street lighting”) ie will be a category.</p> <p>In our original submission what we were wanting to include was that when such a decision was made to create a “generic” type 7 load category that the right of an LNSP to exclude a particular installation from the category was protected.</p>	<p>(ab) <u>This does not preclude the local network service provider (or responsible person ?????) from determining for a specific instance of the category that the conditions in paragraphs (b) are not applicable and hence that a meter must be installed.</u></p>
32.	Table 7.2.3.1 Item 5	M	<p>In our original submission #29 we wrote:</p> <p>The conditions for classification by NEMMCO should not necessarily be both the magnitude of the <i>load</i>; <b>and</b> the connection arrangements. An installation’s connections arrangements might be such that the installation of a meter is easy however the load is such that annual consumption is</p>	<p>(3) it would not be cost effective to meter the <i>connection point</i> taking into account:</p> <p>(i) <u>the cost of the meter</u>  (ii) <u>the cost of metering services for regular reading</u>  (iii) <u>the revenue generated from the load</u></p> <p><del>(i) the small magnitude of the load;</del></p>

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			<p>so small that the meter and reading costs still cannot be justified.</p> <p>The Commission in its analysis of this proposed change, suggested that the measure for whether a load could be considered as a type 7 was “the cost of the meter and reading is more than the revenue generated from the load” and implied that, provided that this was the case, the provision should “not offer any restriction to the determination under this provision”.</p> <p>Under our reading of the intent of Item 5, as defined by the Commission’s words in the determination, subpoints (i), (ii) and (iii) under (b)(3) are not required and can be removed. The fundamental decision is cost of the meter services (\$ value) compared with the size (\$ value) of the load.</p> <p>If any detail of the basis of the costs comparison is included (and SP AusNet suggest that it is probably not required), it should probably be to set out the factors as defined by the Commission.</p>	<p><del>(ii) the connection arrangements; and</del>  <del>(iii) the geographical and physical location;</del></p>
33.	# 16	A		
34.	# 17	A		
35.	# 18 Standard T&Cs		<p>In our original submission #6 with respect to Clause 7.2.3(h) we wrote:</p> <p>It would seem inappropriate there should be a unqualified process within Chapter 7 for the dispute of a standard set of terms and conditions as generally these will be determined through the DNSP’s access arrangement establishment process involving the AER. The dispute mechanism for</p>	

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			<p>these would be a more fundamental one of questioning the AER's determination.</p> <p>The Commission's response appears to have missed the point of our comment. The envisaged situation is that we as a LNSP have had approved by the AER, thru their approval of our Terms and Conditions, a fee for a particular service of say \$50. A Retailer then disputes this service fee suggesting that it should be only \$40. This is fundamentally a dispute against the AER's approval of the \$50 service fee. The issue raised by SP AusNet was: Is a dispute under Rule 8.2 appropriate in this case, or if the Retailer considers the approved fee should be \$40, should they rather approach the AER?</p> <p>We suggested that the use of Rule 8.2 was not appropriate.</p>	
36.	7.2.3 (d) and (e) Was SP AusNet # 4	L	Wording only: "a" missing	<p>(d) The <i>Local Network Service Provider</i> may provide <i>Market Participants</i> with a standard set of terms and conditions on which it will agree to act as the <i>responsible person</i> for <u>a</u> type 5, 6 or 7 <i>metering installation</i>.</p> <p>(d) Where .....for <u>a</u> type 5, 6 or 7 <i>metering installation</i></p>
37.	#19 Time setting	A		
38.	#20 Design standards	A		

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39.	#21 ILAC recognition		<b>Requested Comment:</b> ILAC recognition	SP AusNet have not established a view on the matters raised by Ergon.
40.	#22 Meter test timeframes		<p><b>Requested Comment:</b> Need for asset management guideline</p> <p>SP AusNet support the need for a guideline to be formally established for preparing and approving a asset management strategy.</p> <p>In our recent submission to NEMMCO re the changes to the Metrology Procedure associated with these Rules changes we suggested that the following clause should be added to Section 2.6 of the Metrology Procedure :</p> <p style="padding-left: 40px;">NEMMCO must establish and publish a guideline which it will use as the basis of asset management strategy and test plan approval and NEMMCO may revise the guideline from time to time in consultation with industry.</p> <p>There is a document to aid the development of asset management plans but the SP AusNet’s Metrology Procedure comments were associated with making this more formal and bringing it under change control. These plans are long term and the associated costs are relatively high. Our view is that there needs to be clarity and stability and industry involvement in change.</p>	

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41.	#23 Accuracy tables		SP AusNet have not established a view on the matters raised in this Proposal	
42.	#24 Testing uncertainties table		SP AusNet have not established a view on the matters raised in this Proposal	
43.	#25 Test results	A		