

23 September 2010

The Australian Energy Market Operator
 PO Box A2449
 Sydney South 1235
 Att: Marc Tutaan / Rory Campbell

Level 22
 530 Collins Street
 Melbourne VIC 3000

Postal Address:
 GPO Box 2008
 Melbourne VIC 3001

T 1300 858724
 F 03 9609 8080

Dear Marc

Response to ERC092: Consultation Paper on Specific Issues

Thanks you for the opportunity to respond to this consultation paper.

We are very satisfied with the overall concepts and positions proposed in the paper, and have a few comments relating to detail matters. These are put forward in the table below, and we have attached a marked up version of the proposed Rules.

Clause	Comment
7.2.1(a)(2)	<p>Clause describes: "...delivery of the processed data to the metering database, ..."</p> <p>This implies that the data is only delivered to AEMO, but in fact the data is also delivered to other parties eg the FRMP.</p> <p>AEMO would like to propose that the words "to the metering database" be deleted.</p>
7.2.1A(a)(2)	Same comments as for 7.2.1(a)(2)
7.2.1A(b)(1)	Same comments as for 7.2.1(a)(2)
7.2.1A(b)(2)(A)	<p>Clause describes: "to permit Metering Data Providers to provide metering data services between the metering installation and the metering database."</p> <p>This implies that the data is only delivered to AEMO, but in fact the data is also delivered to other parties e.g. the FRMP.</p> <p>AEMO would like to propose that the words "between the metering installation and the metering database" be deleted.</p>
7.2.1A(b)(2)(E)	<p>Clause describes: "to provide metering data services to AEMO."</p> <p>This implies that the data is only delivered to AEMO, but in fact the data is also delivered to other parties e.g. the FRMP.</p> <p>AEMO would like to propose that the words "to AEMO" be deleted.</p>

7.2.1A(d)(1)	<p>The clause requires that AEMO specify and publish special site and technology related conditions. AEMO believes that due to the extreme number of configurations and variations possible, this obligation would be almost impossible to comply with.</p> <p>AEMO would like to suggest that this obligation be changed to require AEMO to notify the relevant FRMPs when these conditions are present.</p>
7.2.3(j)	<p>AEMO believe that the Transmission Network Service Provider is the most suitable party for this role. AEMO is not in a position to take on this role, as this role requires access to the metering installation and assets, as well as being on site to identify faults and problems, and providing or arranging maintenance on the equipment.</p>
7.2.5(g)(1)	<p>Clause describes: “to permit Metering Data Providers to provide metering data services between the metering installation and the metering database.”</p> <p>This implies that the data is only delivered to AEMO, but in fact the data is also delivered to other parties e.g. the FRMP.</p> <p>AEMO would like to propose that the words “between the metering installation and the metering database” be deleted.</p>
7.2.5(i)	<p>This clause is under the heading “Role of the Responsible Person”, yet it places an obligation on AEMO that is a repeat of an earlier obligation [7.2.1A(d)(2)]. Suggest deletion.</p>
7.2.5(j), 7.2.5(k)	<p>We believe that this is already covered by the provision for Joint Metering Installations [7.2.4]. Suggest deletion.</p>

Please do not hesitate to contact me if you have any queries.

Yours sincerely

Roy Kaplan
Manager Metrology Regulation

cc:

Attachments:

Australian Energy Market Commission (AEMC) proposes to make the following amendments to the Draft Rule issued under notice dated 6 May 2010 relating to the Australian Energy Market Operator's responsibility for metering data services.

7.2.1 Responsibility of the responsible person

- (a) The *responsible person* is the person responsible for:
- (1) the provision, installation and maintenance of a *metering installation*; and
 - (2) the collection of *metering data* from each *metering installation* for which it is responsible, the processing of that data and the delivery of the processed data ~~to the *metering database*~~, except where specified otherwise in clause 7.2.1A(a);
- (b) The *responsible person* must perform its role in accordance with:
- (1) this Chapter 7, ~~the *metrology procedure*~~; and
 - (2) procedures authorised under the *Rules*.
- ~~(b)~~(c) AEMO must establish, maintain and publish relevant explanatory material that sets out guidelines in relation to the role of the *responsible person* consistent with this Chapter 7.

[New clause] 7.2.1A Responsibility of AEMO for the collection, processing and delivery of metering data

- (a) Where the *Market Participant* has selected a *responsible person* for a *metering installation* in accordance with clause 7.1.2(a)(2) and that *responsible person* is a *Transmission Network Service Provider*:
- (1) the *Transmission Network Service Provider* is responsible for the provision, installation and maintenance of the *metering installation*; and
 - (2) AEMO is responsible for the collection of *metering data* from that *metering installation*, the processing of that data and the delivery of the processed data ~~to the *metering database*~~.
- (b) In performing its role under subparagraph (a)(2), AEMO must:
- (1) comply with the processes for the collection, processing and delivery of *metering data* from the *metering installation* ~~to the *metering database*~~ in accordance with the requirements of the procedures authorised under the *Rules*;
 - (2) through the establishment of additional processes if necessary:
 - (A) permit *Metering Data Providers* to provide *metering data services* ~~between the *metering installation* and the *metering database*~~;
 - (B) permit the *financially responsible Market Participant* to select the *Metering Data Provider* of its choice to perform the *metering data services* in accordance with this clause, except where special site or technology conditions are to be accommodated as provided for in paragraph (d);
 - (C) select the *Metering Data Provider* where:

- (i) special site or technology related conditions exist, as determined by AEMO in accordance with paragraph (d); or
 - (ii) the financially responsible Market Participant fails to select the Metering Data Provider in accordance with subparagraph (2)(B),
 - (D) require the Metering Data Provider chosen by the financially responsible Market Participant in subparagraph (2)(B) to provide metering data services to that participant; and
 - (E) require the Metering Data Provider chosen by AEMO in subparagraph (2)(C) to provide metering data services to AEMO and to accommodate the special site or technology related conditions when providing those services;
- (3) incorporate in the service level procedures any additional processes established by AEMO for the purpose of fulfilling its obligations under subparagraph (b)(2).
- (c) For the purpose of subparagraph (b)(2)(B), AEMO is to be regarded as the financially responsible Market Participant for interconnectors.
- (d) If AEMO determines that a metering installation is affected by special site or technology related conditions and that these conditions need to be accommodated by the financially responsible Market Participant when choosing a Metering Data Provider, AEMO must:
 - (1) specify and publish those notify the FRMP when special site and technology related conditions exist, including the date by which those conditions need to be accommodated;
 - (2) be reasonably available to clarify any matters with the financially responsible Market Participant, at the request of that person, in order for that person to choose a Metering Data Provider for that metering installation that is mutually suitable to that person and AEMO.
- (e) If a special site or technology related condition identified by AEMO under subparagraph (d)(1) impacts on two or more financially responsible Market Participants then those Market Participants must agree and notify AEMO of the Metering Data Provider that will provide the metering data services for the relevant metering installation(s), sufficient to accommodate the special site and technology condition by the date specified in subparagraph (d)(1).
- (f) In the absence of such an agreement specified in paragraph (e), AEMO may nominate a Metering Data Provider to provide the metering data services for those metering installations.

7.2.2 Responsibility of the Market Participant

AEMC proposes to remove paragraphs (c), (d) and (e) in the Draft Rule.

7.2.3 Responsibility of the Local Network Service Provider

AEMC proposes to remove paragraphs (j), (k) and l) in the Draft Rule.

AEMC proposes to add the following paragraph to the Draft Rule:

Responsibility of the Transmission Network Service Provider

(j) The Transmission Network Service Provider is the responsible person for metering installations on an interconnector.

7.2.5 Role of the responsible person

AEMC proposes to add paragraphs (g) and (h) to clause 7.2.5 of the Rules:

Metering data services

(g) The responsible person (other than when the Transmission Network Service Provider is the responsible person for a metering installation) must, for each metering installation for which it is responsible:

(1) engage a Metering Data Provider (unless that person is a Metering Data Provider) to provide metering data services—between the metering installation and the metering database;

(2) ensure that the Metering Data Provider chosen in paragraph (h) accommodates the special site and technology related conditions determined by AEMO in accordance with paragraph (i);

(3) ensure that metering data services are provided in accordance with the Rules, the metrology procedure and procedures authorised under the Rules;

(4) 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 interval energy data is collected; and

(5) arrange for the provision of relevant metering data to the Metering Data Provider if remote acquisition, if any, becomes unavailable.

(h) A responsible person, prior to engaging a Metering Data Provider under subparagraph (g)(1), must liaise with AEMO to determine if there are any special site or technology related conditions to be accommodated when choosing the Metering Data Provider for a metering installation.

(i) If AEMO determines that a metering installation is affected by special site or technology related conditions and that these conditions need to be accommodated by the responsible person when choosing a Metering Data Provider, AEMO must:

(1) specify and publish those special site and technology related conditions, including the date by which those conditions need to be accommodated;

(2) be reasonably available to clarify any matters with the responsible person, at the request of that person, in order for that person to choose a Metering Data Provider for that metering installation that is mutually suitable to that person and AEMO.

(j) If a special site or technology related condition identified by AEMO in the document published in accordance with subparagraph (i)(1) impacts on two or more responsible persons then those responsible persons must agree and notify AEMO of the sole responsible person for the relevant metering

~~*installation(s) who is able to accommodate the special site and technology related condition by the date specified in subparagraph (i)(1).*~~

~~*(k) In the absence of such an agreement specified in paragraph (j), AEMO may nominate one of the responsible persons to be the sole responsible person for those metering installations.*~~