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16 October 2009

Our Reference: UE.RE.11.06

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

AEMC project reference code ERC 009/1

BY EMAIL: www.aemc.gov.au

National Electricity Amendment (Provision of Metering Data Services and Clarification of Existing Metrology Requirements) Rule 2009

United Energy Distribution appreciates the opportunity to provide comments on the first round of consultation on the AEMO Rule change proposal titled Metering Data Providers and related matters.

The proposed rule changes seek to:

- Enable the responsible person to select the metering provider and metering data provider for all metering installation types and for the responsible person to be responsible for the end to end processes across both service providers;
- Place the existing metering data agents and metering data providers into chapter 7 of the Rules in a similar manner to the Metering providers;
- Transfer responsibilities for the remote acquisition of metering data on to the responsible person and away from AEMO;
- Amend the metering installation to encompass the meter and components at the site as opposed to the inclusion of the metering data providers data collection and processing for meter type 5-7 which had been included; and
- Introduce a new service level procedures which is required to bind metering providers and metering data providers.

We note that AEMO have highlighted the complexity of the approaches for the different metering installation types and that this proposal is not concerned with specific changes for smart meters, however it does take account of the introduction of smart meters.

Key Findings

UED is generally supportive of the proposed changes and the approach to simplify the responsible person role and the service provider structure across all metering types. In summary, UED;

- Support the responsible person selecting the metering provider and metering data provider, however further clarity may be warranted for smart metering;
- Support enhanced services only with the agreement of the responsible person;
- Consider a third layer of data access is not warranted and introduces unnecessary burden;
- Do not support the introduction of the proposed service level procedure. These are not needed as the required items are covered by existing metrology procedure obligations to include these items for all meter types;
- Do not support the proposal to alter the settlement ready data definition as there is no benefit; and
- Supports the dispute resolution amendments proposed in addition the existing Rules requirements.

AEMO suggest this is more of a contractual change relating to the amendments in the MDA area as opposed to an operational change. On this basis the impacts are in the area of the deed/contractual arrangements and the flow on impacts to the NEM documentation to clarify the service provider roles. UED are concerned that there are a number of unintended impacts that have arisen and offer detailed drafting comments in Attachment 1. These detailed comments also clarify the impacts on smart metering in relation to transfer of remote acquisition responsibility, impacts of smart metering being a type 4 meter, in addition to timing and cost impacts.

If there is no operational impact as we understand is the intent, then we are comfortable that a 9 month transition may be achievable. However until the drafting is finalised by the AEMC in the Final Determination we will be unable to assess the impact.

Support the responsible person selecting the metering provider and metering data provider, further clarity may be warranted for smart metering

UED supports the proposal that the responsible person select both the Metering Provider and the Metering Data Provider. AEMO suggest that this approach clarifies the roles of the two service providers and eliminates the boundary issues between the two roles.

We accept that AEMO has taken great care not to pre-empt smart metering arrangements that may be considered by the NSSC. However by doing the drafting has avoided any clarification regarding the procurement, management, maintenance of the non public telecommunication network. The responsible person is responsible for ensuring that the end to end processes meet the requirements of the Rules. Other Rules require that the Metering Data Provider role maintain security, however it may not be their network to manage. These issues will need to be considered in the drafting the NSSC propose for national smart metering.

Enhanced services only with the agreement of the responsible person

The responsible person is responsible for the end to end processes to ensure that the Rules requirements are met. As such amendments to their metering installation or enhanced offerings agreed between the Market Participant and the Metering Data Provider must not jeopardise the services required by the Rules and the provision of metering data to all parties for all the financial settlement processes, nor breach any other laws. The enhancement of service offerings needs to be with the agreement of the responsible person.

We consider that the Rules do not need to cover commercial contract negotiations. We have proposed amendments to Rule 7.2.3 (c) (2) and 7.11.2 (b).

A third layer of data access is not warranted and introduces unnecessary burden

The proposed Rules require three levels of access by a number of parties. It is really not clear how this extra access meets the National Electricity Objective as opposed to creating an administrative and compliance burden on the Metering Data Provider,

- All registered participants and service providers have access to the central repository of data ie MSATS. Regulators or Ombudsman also have the right to request the data that they need from AEMO.
- Rule 7.7 (b) requires all parties to have electronic access to the metering installation where passwords are available, otherwise access from the metering data services database or the metering database. The Metering Data Provider providing electronic access into their systems is a significant cost and administrative burden. This is met today by the Metering Data Provider providing or pushing data on request to the party requesting the data.

Service level procedure not required – covered by existing metrology obligations

The Rule changes propose a new service level procedure in the Rules. We have highlighted the extent of overlap between the proposed service level procedure and the existing metrology procedure in Attachment 2.

The current three authorised procedures under the Rules, MSATS procedures, B2B procedures and metrology procedure have resulted in some 59 procedural documents that require review and assessment as these Rules changes and national smart metering impacts are assessed. This is a significant work effort across AEMO and industry to review/assess, develop necessary changes and also review the proposed changes as consultation processes progress with our business and implement the changes. We are keen that the documentation structure is clear and efficient in order that it better meets the National Electricity Objective.

We should not be perpetuating a framework that increases the level of documentation and duplication. There is no clear need or justification provided in the Rule proposal. There is no need to create a new set of procedures to bind Metering Providers and Metering Data Providers as these service providers are already bound by the Rules to comply with the existing procedures.

Providing a number of Rules where the obligation refers to both the metrology procedure and the service level procedure does not assist the clarity or industry understanding of obligations. This aspect of the proposal does not meet the National Electricity Objective.

The proposal to allow a new service level procedure creates more and more documentation to be generated which creates uncertainty, complexity and confusion. This approach leads to inconsistencies, duplications and further uncertainty. We suggest that to the extent any parts of the service level requirements are not already covered in the Rules or the metrology procedure, that they be incorporated in a succinct manner into the metrology procedure.

The metrology procedure recognises the legitimate interests of the Metering Provider and Metering Data Provider in providing a service to the retailer, LNSP and AEMO for the retailer's billing of the customer, the LNSP's billing of the retailer and the wholesale market settlement. As we progress to smart metering which offer more complex metrology services, it is better if the market development nature of these services is recognised in the metrology procedure and its impact on all parties. It will also assist the move to smart metering if the metrology impacts are contained in one procedure, not many. We do not consider that the introduction of new procedures which add to the complexity and increase confusion provide an appropriate platform to assist the smart metering changes and hence suggest that the service level procedures are not introduced.

Proposal to alter the settlement ready data definition has no benefit

AEMO also propose a change to the settlement ready data definition. The changes appear to be minor but have more significant ramifications with no real benefit. AEMO propose that the settlement ready data is data held in the metering database rather than the data delivered to the metering database by the Metering Data Provider. The Metering Data Provider today delivers the settlement ready data to the financially responsible market participant, local retailer, LNSP and AEMO. All parties use the same dataset for the financial transactions. This approach allows the LNSP to use the Metering Data Providers data for billing.

The proposed change in conjunction with Rule 6.20.1 (e) (1) requires the LNSP to collect the settlement ready data from AEMO by a new replication system in order to use this data for network billing. AEMO only use kWhr data for wholesale settlement whilst the LNSP had been able to previously use the dataset provided by the Metering Data Provider including kVar data.

The level of inefficiency increases substantially if smart meters are considered type 4 meters or if these issues are not addressed in a further Rule change.

The proposal to clarify that the settlement ready data is held in the metering database rather than delivered to metering data base has no prescribed benefit and should not proceed.

Dispute resolution amendments supported

A number of changes have been proposed in relation to Chapter 8 regarding the Metering Provider and Metering Data Providers right to use Rule 8.2. UED supports these changes and also supports the existing requirements for the dispute resolution process, use of Rule 8.2, to be maintained in both the Metering Provider and Metering Data Provider accreditation processes in Rules 7.4.2(ba) and 7.4.2A (c).

We would welcome the opportunity to meet with you and discuss any aspects of this submission if you feel this is beneficial. If you have any questions in relation to the submission please phone (03) 8540 7819.

Yours sincerely



Verity Watson
Manager Regulation Strategy

Attachment 1

Chapter 7 Drafting Comments

Clause	Issue	Recommendation
7.1.1 (b) (3)	The proposed Rule refers to the metering data services. We suggest that the metering data services be replaced with the collection, processing and delivery of metering data. This is consistent with the high level description of the Metering Data Provider role in S7.1 and places the Metering Data Provider role at the same level of description as that of the Metering Provider role.	provision, installation and maintenance of <i>metering installations</i> and the provision of metering data services <u>collection, processing and delivery of metering data</u>
7.2.1 (a) (2)	Refer to rationale provided in 7.1.1 (b) (3). A similar amendment should be made to 7.2.1 (a) (2)	the collection, processing and delivery of metering data <u>provision of metering data services</u> in relation to each <i>metering installation</i> for which it is responsible;
7.2.3 (c) (2)	<p>The offer provided by the Local Network Service Provider (LNSP) to the market participant is a competitive quote in a contestable service provider market. We query why there is a need to provide other than the terms and conditions of the offer to meet the necessary services required by the Rules.</p> <p>Aspects of commercial negotiation should not be covered in the Rules. If the market participant requests additional services to our offer then the LNSP is able to offer terms and conditions for those also. The framework should not have an offer from us coexisting with changed terms and conditions from another party.</p> <p>The responsible person is responsible for the end to end provision of services under the Rules and is responsible for providing the services in accordance with the terms and conditions of its offer. We do not support that the market participant may seek additional services from other parties who may also be engaged with us.</p>	provide the <i>Market Participant</i> with the name of the Metering Provider and the name of the Metering Data Provider that would be engaged under clauses 7.2.5(a) and 7.2.5(aa) and the terms and conditions on which the offer <u>to provide each service under clause 7.2.1(a)</u> is made,

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7.2.5 (aa)	Refer to rationale provided in 7.1.1 (b) (3). A similar amendment should be made to 7.2.5 (aa) .	<i>A responsible person must for each metering installation for which it is responsible, engage a Metering Data Provider for the <u>collection, processing-and delivery of metering data</u> provision of metering data services unless the responsible person is the Metering Data Provider.</i>
7.2.5 (ab)	<p>Boundary metering may be provided by the transmission network, as a consequence under this Rule proposal they will also need to take on the responsibility for the Metering Data Provider services. This Rule allows AEMO to nominate the Metering Data Provider.</p> <p>Given the specialist nature of transmission connection points and the significance of metering data issues or incomplete metering data on the net system load profile, we concur with the proposal that AEMO may wish to select the Metering Data Provider. However, the ability to select the parties providing the services is best placed with the parties who are responsible and this may be better being AEMO in the case of transmission network connection points.</p>	
7.2.5 (d) (1), (d) (2) and (g) (1)	<p>We consider that it is useful to aid clarity and understanding of the Rules to have a very simple document structure that clearly articulates where the obligations can be found. As we move from jurisdictional instruments to a number of national instruments in relation to metering, we suggest that the documentation structure should be kept tight.</p> <p>Use of terms such as “and procedures authorised under the Rules” is not clear. Is the prime obligation in the CATS procedure, the WIGS procedure the metrology procedure or the new service level procedure?</p>	Amend to the following: <i><u>and the metrology procedure</u> and procedures authorised under the Rules</i>
7.2.5 (d) (4)	The Rule places an obligation on the responsible person that a communications interface be installed and maintained to facilitate	

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	<p>connections to the telecommunication network.</p> <p>The telecommunication network definition includes an obligation on AEMO which is better placed in the Rules in Chapter 7 than in a glossary.</p> <p style="padding-left: 40px;">A telecommunications network that provides access for public use or an alternate telecommunications network that has been approved by <i>AEMO</i> for the remote acquisition of <i>metering data</i>.</p> <p>It is unclear how the responsible person would meet the requirement given:</p> <ul style="list-style-type: none"> • The criteria which AEMO will use to assess the network is not documented in the Rules • Is approval deemed or automatically provided with accreditation? • This places AEMO in a position of approving or vetoing technology options used by registered participants, including technologies with approved cost recovery by the AER. • Is there deemed approval for technologies accepted by jurisdictional Ministers under smart metering determinations? <p>It may be useful to clarify the process and timing of this approval by AEMO or alternatively clarify the approval within the existing accreditation processes and output measures and controls.</p>	
7.2.5 (d) (9)	<p>The problem with the current drafting (and practice) of Rule 7.2.5 (d) (9) is that, under a contestable meter framework, it enables a new meter provider to remove the LNSP's meter from the network, even if the distributors meter is a necessary part of their smart grid.</p> <p>More generally UED believes that no other party should remove or tamper with our existing equipment/assets without our consent. In any other world such removal or tampering with someone else's assets would be theft or</p>	

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	<p>vandalism.</p> <p>It is proposed to create a new Rule 7.2.5 (d) (10) to:</p> <ul style="list-style-type: none"> • Require the competitive meter provider to obtain the consent of the LNSP – consistent with the LNSP being the party who provides the connection services to the customer and manages the connections assets, and meter board , etc. • Require that any such conditions imposed by the LNSP be reasonable <p>Our proposed change to this clause is not intended to limit in any way the parties’ rights to competitive metrology services, where such rights exist under the code.</p>	<p>New Rule 7.2.5 (d) (10):</p> <p>Ensure that the reasonable requirements of the LNSP will be met before arranging for the replacement or alteration of a metering installation</p>
7.2.5 (g) (3)	<p>If remote acquisition becomes unavailable in the mass market smart metering context, it is not practical to be able to obtain the data from the metering installation. This places an inefficient, absolute obligation on the responsible person which cannot possibly meet the national electricity objective. The Rule requires that for one half hour piece of missing data, the responsible person would need to organise a site visit by the Metering Provider to read the meter.</p> <p>As Victoria moves to a smart metering solution, the manual meter reading processes will significantly reduce and ultimately be limited to some check reads. There will no longer be a set of field resources available to read meters daily to provide data when remote acquisition is unavailable.</p> <p>Existing processes allow for estimates to be provided until the data may be collected remotely. If data is lost, then substitution processes also cater for this. These are accepted principles in the market today.</p>	<p>arrange for the provision of relevant metering data to the Metering Data Provider if remote acquisition, if any, becomes unavailable.</p>

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	<p>In the past, a few percent of customers may have been remotely read for meter types 1-4. If remote acquisition was unavailable, then the metering data may have been able to be obtained by other means eg a site visit. In addition, data was only required weekly by 5pm on Tuesday for a settlement week ending on Saturday at midnight.</p> <p>With smart metering in Victoria all of our 660,000 customers will need to be read daily with data provided by 6 am each day. At this volume of customers and tighter service levels, it is no longer appropriate to require this for mass market customers. The Rule should either be deleted or limited to types 1-4 customers who are above 160MWhpa who have a more significant impact on settlement.</p>	
7.2.8 (g)	<p>Service providers are accredited by AEMO, however the service providers are not the agents of AEMO and are bound by contract to the responsible person who has engaged them.</p> <p>Any breach of service provider requirements must also be discussed with the responsible person prior to any breach processes commencing and must be advised to the responsible person before any deregistration processes are commenced. The responsible person is responsible for the end to end delivery of the Rules, however AEMO consider they are responsible for managing the compliance issues of the service providers.</p> <p>The Rules are inadequate in that AEMO have no obligation to advise the responsible person when they undertake these processes. This should be addressed in the Draft Determination.</p>	
7.2.9	<p>Rule 7.2.9 introduces a new service level procedure within the Rules.</p> <p>The service level procedure will place obligations on the Metering Provider</p>	Delete Rule 7.2.9

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	<p>and Metering Data Provider in many areas that are already covered by the metrology procedure. See Attachment 2 for the comparison of the service level procedure and the metrology procedure.</p> <p>Given the high degree of overlap with the metrology procedure and the risk that the two procedures may be in conflict, we do not support the introduction of the new service level procedure. As this proposal and further national smart metering changes flow through to the procedures we suggest that they be included in the metrology procedure as the single source document.</p> <p>Further Rule 7.1.14 (c) (3) states that the metrology procedure must include the obligations of <i>responsible persons</i>, and <i>Metering Providers</i> and <i>Metering Data Provider</i>. This Rule suggests that the metrology procedure is the prime location after Chapter 7 for obligations on these parties, as such the metrology procedure is a better location to add any missing obligations rather than creating a new procedure.</p> <p>We suggest that it is preferential to keep a tight documentation structure in light of the extent of national smart metering changes coming, the fact that the metrology procedure better covers the needs of a number of parties who require metering data as opposed to just the requirement for wholesale settlements, if the changes are contained within the metrology procedures it also allows any flow on impacts from the NECF and smart metering to be contained within one place.</p> <p>Rule 7.2.9 should be deleted, any necessary amendments should be made in the single consultation process which is required for amendments to the metrology procedure as a consequence of this change.</p> <p>Rule 7.2.9 (5) should more appropriately link to the meter data churn</p>	

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	<p>guidelines as opposed to the meter churn guidelines in Rule 7.3.4 (j) to (m).</p> <p>Consequential changes will be required to a number of other Rules, these include:</p> <ul style="list-style-type: none"> • Limiting the procedure referred in Rule 7.11.1 (b) (2), (c) (2) and (d) (2) to the metrology procedure; • Removing the inclusion of service level procedure in S7.6.3 (a) and (c) etc. 	
7.2A.5	The transition to the B2B procedures has occurred. This Rule is spent and could be deleted.	Delete Rule 7.2A.5
7.3.1 (b) (4)	<p>The Rules states that the metering installation may consist of an appropriate panel on which to mount the meter.</p> <p>It is a requirement that the meter must be, not may be, on an appropriately constructed panel. The panel is provided by the customer and is not an obligation on the Metering Provider or the responsible person to provide. The Metering Provider's obligation is limited to ensuring that the metering installation be safely and securely installed.</p> <p>This Rule should be deleted, the panel is part of the customer's installation.</p>	<p>an appropriately constructed panel on which the metering installation equipment is mounted;</p>
7.3.7	<p>The Rule proposal has introduced the term outage within the meter installation malfunctions obligations.</p> <p>The term outage is defined as Any full or partial unavailability of equipment or <i>facility</i>.</p> <p>The term facilities means A generic term associated with the apparatus, equipment, buildings and necessary</p>	The 6 references to outages in Rule 7.3.7 should be removed.

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	<p>associated supporting resources provided at, typically:</p> <ul style="list-style-type: none"> (a) a <i>power station</i> or <i>generating unit</i>; (b) a <i>substation</i> or <i>power station switchyard</i>; (c) a <i>control centre</i> (being a <i>AEMO control centre</i>, or a <i>distribution</i> or <i>transmission network control centre</i>); (d) facilities providing an <i>exit service</i>. <p>The term exit service means A service provided to serve a <i>Transmission Customer</i> or <i>Distribution Customer</i> or a group of <i>Transmission Customers</i> or <i>Distribution Customers</i>, or a <i>Network Service Provider</i> or a group of <i>Network Service Providers</i>, at a single <i>connection point</i>.</p> <p>The use of supply capacity control for the purposes of emergency management or for use at times of network constraints may be allowable under the agreed smart metering rules/protocols. The use of the supply capacity control should not be constrained by the need to gain an exemption from AEMO in Rule 7.3.7.</p> <p>Even without smart metering implications, the loss of a phase could result in partial unavailability of equipment requiring (under the proposed Rule change) that the responsible person rectifies the electricity outage. The Rule is meant to cover the need to manage the metering installation equipment to ensure that it is working, not to manage the supply of electricity.</p>	
7.4.1A (a)	Refer to rationale provided in 7.1.1 (b) (3). A similar amendment should be made to 7.4.1A (a)	<p>The provision of metering data services <u>Collection, processing and delivery of metering data</u> must be carried out only by a <i>Metering Data Provider</i>.</p>

Clause	Issue	Recommendation
7.4.2 (bb) and 7.4.2A (d)	<p>We suggest that the basis for accreditation be made clear. The drafting of (bb) in conjunction with a list provided in (bc), but not limited to those requirements in (bc), does not provide a firm basis for the requirements of a Metering Provider. The governance appears to suggest that the requirements for accreditation or qualification processes are those in the Rules or guidelines developed in accordance with Rules consultation.</p> <p>We recommend that (bb) be amended and (bc) be removed.</p> <p>The same applies to the equivalent Rules for Metering Data Providers, Rule 7.4.2A (d) should be amended and Rule 7.4.2A (e) should be removed.</p>	<p><i>A Metering Provider</i> must comply with the provisions of the <i>Rules</i> and of procedures authorised under the <i>Rules</i>, and with any requirements established by NEMMCO under paragraph (bc), that are expressed to apply to <i>Metering Providers</i>.</p>
7.4.2 (bc) and 7.4.2A (e)	<p>Refer to comments in 7.4.2 (bb).</p> <p>The Rules require cooperation with AEMO and any person they engage, including the delivering up to AEMO of data, works, material and other property in the event of deregistration.</p> <p>This delivering up, what does it mean? Is it “give access to until a suitable alternative supplier is found or the incumbent Metering Provider is able to demonstrate the ability to undertake the functions again”? Is the right a step in and out right, or is it take ownership of assets with compensation?</p> <p>Whilst AEMO is operating in the role of Metering Provider or Metering Data Provider, there needs to be clarity that they are liable to third parties for claims arising from their actions and they are liable for loss or damage of our assets including the data.</p> <p>Further 7.4.2A (e) requires cooperation with AEMO to prescribe the software and systems that are able to be used, including the rights of ownership of intellectual property that is developed or used. There should</p>	<p>Remove Rule 7.4.2 (bc) and 7.4.2A (e).</p>

Clause	Issue	Recommendation
	be no transfer of rights of interest in our assets and IP without fair and reasonable compensation.	
7.4.3 (b)	<p>Metering Providers and Metering Data Providers may be deregistered if AEMO reasonably determine that the service provider may have breached the provision of the Rules. The words reasonably determine and may have breached provide a very loose test for deregistration.</p> <p>We recommend that the words ‘may have breached’ be replaced with ‘has materially breached’.</p> <p>AEMO need to reasonably determine that there has been a material breach of the provisions of the Rules or of the procedures authorised under the Rules. The link to the clauses 7.4.2 (bb) and 7.4.2A (d) allow any other matters that are not required in the authorised procedures to be included. The accreditation guidelines require Rules consultation and include;</p> <ul style="list-style-type: none"> • Metering Service Provider Accreditation Overview; • Service Provider Registration Procedure (part 1); • Service Provider Application Form (part 2); • Service Provider Accreditation Checklist (for all service provider categories); and • Service Provider Compliance Assessment Procedure. <p>The documentation in this accreditation framework provides sufficient governance for accreditation and deregistration without resorting to loose wording such as including any other matters from a non exclusive list.</p>	<p>If <i>NEMMCO</i> reasonably determines that a <i>Metering Provider</i> or a <i>Metering Data Provider</i> may have <u>has materially</u> breached the provisions of the <i>Rules</i> or of procedures authorised under the <i>Rules</i> or any requirements established under clause 7.4.2(bb) or clause 7.4.2A(d) that are expressed to apply to <i>Metering Providers</i> or <i>Metering Data Providers</i> then;</p>
7.4.3 (b), (c) and (d)	<p>Rule 7.4.3 (b), (c) and (d) should also be amended to include notification to the responsible person of the material breach and deregistration. The potential for continued operation under constraints agreed with AEMO should also include agreement by the responsible person. Should</p>	<p>Rule 7.4.3 (b), (c) and (d) should be amended to include notification to the responsible person in relation to the material breach and the responsible person agreement of the constraints of operation required by AEMO.</p>

Clause	Issue	Recommendation
	<p>deregistration proceed, the responsible person will need to organise an alternative service provider.</p> <p>Remove the second 'may' in Rule (d).</p>	
7.7 (b) and 7.7 (a) (7)	<p>As drafted the customer may only seek access to the data at their metering installation from their retailer. This means that the retailer has a monopoly on whether the customer may receive and have an in home display device linked to their meter (yet the ability to allow such a device to access the meter rests with the responsible person and the service providers). If the LNSP provides a web portal for the customer to view their metering data, the customer would appear unable to make this request of the LNSP in the proposed drafting.</p>	<p>Drafting should be amended to be more flexible and enable the customer to seek access to their metering data via the LNSP also.</p>
7.9.1 (i)	<p>This Rule is not required. Rule 6.20.1 (e) (1) and (e) (2) provide a basis on which the distribution charges may be billed.</p> <p>We suggest that this Rule is deleted as it does not assist in adding to the clarity or understanding of the Rules.</p>	<p>The settlements ready data held in the metering database may be used by Distribution Network Service Providers for the purpose of determining distribution service charges in accordance with clause 6.20.1.</p>
7.9.1 (j)	<p>Rule 7.9.1 (j) provides AEMO with an unfettered power to obtain metering data directly from a metering installation. This is an excessive power and unwieldy as we move to more complex metering installations that provide a range of non metrology services. The power should at least be constrained to a last resort situation.</p> <p>This Rule should be deleted.</p>	<p>Despite anything to the contrary in the Rules NEMMCO may obtain metering data directly from a metering installation for the settlements process.</p>
7.9.4 (f)	<p>The term 'best endeavours' has a very onerous legal interpretation which may lead to inefficient outcomes and is not in the long term interest of consumers. The term should be amended to reasonable endeavours.</p>	<p>Where a <i>Metering Data Provider</i> receives notification under paragraph (e) the <i>Metering Data Provider</i> must use its <u>best reasonable endeavours</u> to provide corrected <i>metering data</i> to NEMMCO within 24 hours.</p>

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7.11.1 (a)	<p>The clarity of the requirements may be improved by linking the requirements to the party that has the obligation, the responsible person. We suggest that clause (a) be amended to clarify that the responsible person needs to organise that interval metering data must be provided to AEMO where the metering installation has the capability and is using remote acquisition.</p> <p>Smart meters could be installed in advance of communications, whilst the smart meter itself has the capability for remote acquisition, the remote acquisition collection process by the Metering Data Provider may not yet be in place.</p>	<p>Subject to clause 7.3.4(g) and paragraphs (b) and (c), <u>the responsible person must ensure that interval metering data is available</u> required for all trading intervals where the metering installation has <u>been commissioned</u> the capability for remote acquisition of actual interval metering data.</p>
7.11.1 (b) (2) 7.11.1 (c) (2) 7.11.1 (d) (2)	<p>As drafted the Rule provides for the obligation to be provided in two sets of procedures. This does not provide clarity and may lead to confusion and misunderstanding, we suggest the reference to service level procedures should be deleted as this has always been drafted as a reference to the metrology procedures in (c) and (d)</p> <p>The reference to service level procedures should be removed from (b) (2), (c) (2) and (d) (2).</p>	<p>(2) within the timeframe required for settlements and prudential requirements specified in the metrology procedure, and the relevant service level procedures</p>
7.11.1 (b) (4)	<p>The requirements to provide data for settlements and the requirements to provide data that has been substituted are requirements in accordance with the metrology procedure. Drafting clarity would be improved by linking the requirement to the relevant procedure as opposed to a Rule that the metrology procedure must include these requirements.</p>	<p>actual or substituted in accordance with the <u>metrology procedures established by NEMMCO</u> under clause 7.14.1(e)(6);</p>
7.11.1 (c) (3) 7.11.1 (d) (3)	<p>Refer to comments on 7.11.1 (b) (4)</p>	<p>actual, substituted or estimated in accordance with the <u>metrology procedures established by NEMMCO</u> under clause 7.14.1(e)(6);</p>
7.11.2 (a) (6)	<p>The Rule as drafted states that the Metering Data Provider must provide access to metering data, NMI standing data or information from the metering register. The MSATS system is the central repository for the</p>	<p>providing access to metering data, NMI Standing Data or information from the metering register for a metering installation</p>

Clause	Issue	Recommendation
	<p>complete set of NMI standing data, some of which is provided by the LNSP or Metering Provider and not the Metering Data Provider. The obligation on the Metering Data Provider should be limited to the metering data as the Metering Data Provider database is the database of record being closest to the source of the data and being responsible for the processing of the metering data.</p>	<p>to persons entitled to receive data in accordance with clause 7.7;</p>
7.11.2 (b)	<p>The responsible person engages the Metering Data Provider and is responsible for end to end processes and possibly the provision of a ‘collection’ infrastructure in relation to smart meters. It is inappropriate for the FRMP to arrange services with the Metering Data Provider directly where they are not also the responsible person and in charge of the contractual arrangements.</p> <p>There should be no need for a Rule clarification for the exceeding of data services. This is a contractual matter for the FRMP as responsible person to arrange under commercial terms with their service providers or for the FRMP to arrange with the responsible person as a commercial matter where they are procuring the services of the LNSP as the responsible person. The inclusion of such a Rule perpetuates a culture of excessive Rules and serves no purpose.</p> <p>The Rule is not required and should be deleted.</p>	<p>Metering Data Providers may provide additional data services that exceed the minimum requirements of the Rules, service level procedures or the metrology procedure at the request of the Financially Responsible Market Participant with the full costs of this work being met by the Financially Responsible Market Participant.</p>
7.11.3 (c)	<p>All substituted and estimated metering data is stored in the metering data services database in a manner that is verifiable and identifiable from the raw data collected. This is consistent with the revised definitions for these terms.</p> <p>Once data is no longer stored on line in the metering data service database it is held in backups which allow the data to be retrieved if required later. The drafting is not clear whether the metering data services database is able</p>	<p>(c) Metering Data Providers, for metering data associated with each metering installation, must ensure that:</p> <p>(1) the data (including records of adjustments and substitution) is stored separately from the metering data services database and retained for a period of 7 years in the form in which it was collected; and</p>

Clause	Issue	Recommendation
	<p>to be backed up into one consolidated database or whether the adjusted or substituted metering data needs to be kept separately from other metering data.</p> <p>The archive requirements for the metering data services database in (a) is 5 years 11 months off line and the requirement in (c) is 7 years. The intent is that 7 years of data should be available either on line or in an archive form. The requirements should be consistently drafted at 5 years and 11 months.</p> <p>The drafting is confusing, we suggest that Rule 7.11.3 (c) is deleted. Rule 7.11.3 (a) covers the storage of metering data online and in an archive to ensure that 7 years of data is available. This requirement to store metering data covers all versions of metering data:</p> <ul style="list-style-type: none"> • The raw metering data ie in the form in which it was collected; and • Each adjustment or substitution made to the data. 	<p>(2) records of each adjustment or substitution to the metering data in respect of a metering installation is stored separately from the metering data services database and retained for a period of 7 years.</p>
7.11.3 (d)	<p>Rule 7.14.1 (c) (4) (ii) requires that the metrology procedure must include the timeframe obligations for the extraction or delivery of metering data from a metering installation for the purposes of settlement. The metrology procedure already requires data to be delivered in the data file format. Given the obligations to deliver data are already required of the metrology procedure, it would be a more appropriate reference than the service level procedure.</p> <p>The reference to the service level procedure should be amended to reflect the obligation for this to be in the metrology procedure.</p>	<p>(d) Metering Data Providers must maintain electronic data transfer facilities in order to deliver metering data from the metering data services database to the metering database and to Market Participants and Network Service Providers who are entitled to access in accordance with the relevant service level metrology procedures.</p>
7.11.3 (i)	<p>As outline above (Rule 7.14.1 (c) (4) (ii)), the metrology requirement refers to the extraction or the delivery of data to the metering database. We consider that this is a very different concept from providing electronic access to all relevant parties to the data in the metering data services database. In the market today the data is provided by the metering data</p>	<p>The metering data services database must have the capacity for electronic access by Market Participants and Network Service Providers who are entitled to access the Metering Data Services Database.</p>

Clause	Issue	Recommendation
	<p>service provider to other participants by forwarding the data ie pushing the data out. This avoids the need for an administrative overhead related to controlling electronic access direct into the database which requires complex read access to control the relevant data the retailer may view for the specific time that the retailer was considered the FRMP in the market for each NMI.</p> <p>If each MDP needed to provide direct electronic access into their meter data services database then it would be useful for the databases data format and access requirements to be consistent, otherwise all parties need to be able to collate data from about 15-17 different MDPs formats and meet the differing access requirements. Gaining this agreement beyond the Final Rule Determination, including the delivery of systems could take in the order of two years. If this was required than the transition of 9 months is not sufficient.</p> <p>The reference to electronic access has the connotation that parties may log into the metering data service providers system and pull the data out which is inconsistent with current practice, impacts the existing MDP's for types 5-7 in the market and is inefficient given that retailers, LNSP's and AEMO are provided the metering data by the MDP's pushing the data out and most of the data is also available from AEMO as the central repository.</p> <p>This is not a direct requirement in clause 7.9.1 as stated in the explanation. Rule 7.9.1 (c) is limited to the MDA database or AEMO metering database, it is not a requirement on the current MDP's for metering types 5-7.</p> <p>We recommend that the Rule be deleted and further amendments made to Rule 7.11.3 (d) to reflect that the data must also be delivered to Market Participants and the Network Service Providers who are entitled to have</p>	

Clause	Issue	Recommendation
	access.	
7.11.3 (j)	<p>The Rules drafting is unclear. As proposed the metrology procedure and proposed service level procedure both cover areas of the process for data collection performance, processing and delivery. In addition AEMO review in detail system design and process as part of the accreditation process, it is unclear why a further approval is necessary.</p> <p>We suggest that the clause be deleted.</p>	(j) The Metering Data Provider's rules and protocols for the collection of metering data from a metering installation must be approved by NEMMCO and NEMMCO must not unreasonably withhold such approval.
7.11.3 (k)	<p>Refer to our comments on Rule 7.2.5 (g) (3).</p> <p>The Rule should be deleted, current practices of estimation and substitution are more efficient for mass market smart metering. We do not require such inefficient processes for small customers today (where profiled data is used for settlement), this does not contribute to the national electricity objective.</p>	The Metering Data Provider must arrange with the responsible person to obtain the relevant metering data if remote acquisition, if any, becomes unavailable.
7.11.5 (b) (5)	<p>The Rule as drafted refers to 7.3A I. There is no 7.3A I, reference should be corrected.</p> <p>This Rule 7.11.5 incorporates the old Rule 7.9.3, however the relevant drafting in Rule 7.9.3 refers to a clause that no longer exists.</p>	Amend reference or delete the Rule 7.11.5 (b) (5).
7.14.1 I (4) (ii)	The Metering Data Provider has the obligation to extract and deliver data from the metering data services database. Given the revised version of the metering installation, the reference to it is no longer appropriate.	(ii) the timeframe obligations for the extraction or delivery of <i>metering data</i> <u>from a metering data services database</u> from a metering installation for the purpose of settlements; and
S7.4.4 (a) S7.4.3 (g)	<p>The Rule proposal explanatory note states that the metrology procedure will establish all of the capabilities for MP for categories type 5 and 6. We suggest that the drafting reflect the AEMO proposal.</p> <p>A similar amendment should also be made to S7.4.3 (g).</p>	all of the capabilities relevant to that type of <i>metering installation</i> which are set out in the Rules and metrology procedures authorised under the Rules
S7.6.3 (f) (1), (g)	As outlined above in Rule 7.11.2 (a) (6), the NMI standing data obligation	

Clause	Issue	Recommendation
and (i) (3)	should be limited to the relevant NMI standing data that the metering data provider is required to provide in accordance with the CATS procedure or is required to use for data processing.	

Chapter 10 Drafting Comments

Clause	Issue	Recommendation
Metering Data Services	MSATS acts as the central repository for NMI standing data and metering register information. The metering data services only need to use some elements of the NMI standing data and the metering register, not all information. It seems inappropriate or inefficient to place these data obligations in a service provider role that may not even use them. We suggest that NMI standing data is limited to the relevant NMI standing data to undertake the role and similarly with the metering register information.	metering data services The services that involve the collection, processing, storage and delivery of <i>metering data</i> and the management of <u>relevant NMI Standing Data</u> and <u>relevant</u> information from the <i>metering register</i> in accordance with the <i>Rules</i> .
Metering Data Services Database	Refer to comments above on the metering data services definition	metering data services database The database established and maintained by the <i>Metering Data Provider</i> that holds the <i>metering data</i> , <u>relevant NMI Standing Data</u> and <u>relevant</u> information from the <i>metering register</i> relating to each <i>metering installation</i> for which the <i>responsible person</i> has engaged the <i>Metering Data Provider</i> to provide <i>metering data services</i> .
Metering Installation	The second note (3) should be (4).	
Service Level Procedures	If the service level procedure remains in the Rules proposal, it should be one clear, concise procedure rather than procedures. We understand that the MSATS procedures, the metrology procedure and the B2B procedures are three main sets of procedures authorised under the	service level procedures The procedures established under the <i>Rules consultation procedures</i> by NEMMCO in accordance with clause 7.2.9.

Clause	Issue	Recommendation
	Rules, however this has resulted in 59 NEM procedural documents requiring review for smart metering.	
Settlements Ready Data	<p>In the NEM the settlements ready data is the data that is processed by the MDA or MDP and provided to AEMO ie delivered to the metering database. The MDA provides this same set of data to the retailers and LNSP in order for the network billing and retail billing to use the settlement ready data.</p> <p>The LNSP for meter types 5-7 also use the data provided by the MDP to AEMO and retailers as the settlement ready data. This arrangement is also clarified in Rule 6.20.1 (e) (2).</p> <p>The proposed change is inefficient as it potentially requires the LNSP to replicate the dataset in the AEMO metering database, just in case AEMO has also processed the data in order to be able to bill types 1-4 metering installations. This is exacerbated considerably if small customer smart metering is considered a type 4 metering installation as this could require a significant amount of data replication.</p>	<p>settlements ready data The <i>metering data</i> that has undergone a validation and substitution process by NEMMCO <i>the Metering Data Provider</i> for the purpose of <i>settlements</i> and is held in the <u>delivered to the</u> <i>metering database</i>.</p>
Telecommunications network	Refer to our comments on Rule 7.2.5 (d) (4). The obligation on AEMO to approve non public telecommunications networks needs to either be removed or made more transparent in Chapter 7.	

Attachment 2

Comparison of the service level procedure requirements and coverage by the existing metrology requirements

Clause reference	The service level procedures must specify requirements for	Clause reference	The <i>metrology procedure</i> must include
7.2.9 (c) (1)	the provision, installation and maintenance of <i>metering installations by Metering Providers</i> ;	7.14.1 (c) (2)	the requirements for the provision, installation and maintenance of <i>metering installations</i> ;
7.2.9 (c) (2)	the systems and processes for the collection, processing and delivery of <i>metering data by Metering Data Providers</i>	7.14.1 (c) (1) (ii) and (iii) 7.14.1 (c) (6)	the timeframe obligations for the extraction or delivery of <i>metering data</i> from a <i>metering installation</i> for the purpose of <i>settlements</i> ; prepare the data using devices or algorithms to form <i>metering data</i> ; procedures for the preparation of <i>settlements ready data</i> on the following matters: (i) <i>the data</i> validation and substitution of <i>metering data</i> in accordance with clause 7.11.29.4; (ii) <i>the data</i> estimation of <i>metering data</i> for the purposes of clause 7.11.1; and.....
7.2.9 (c) (3)	the performance levels associated with the collection, processing and delivery of <i>metering data</i>	7.14.1 (c) (4) (iii)	the performance standards for <i>metering data</i> required for the purpose of <i>settlements</i>
7.2.9 (c) (4)	the data formats that must be used for the delivery of <i>metering data</i> that allow access to <i>metering data</i> from the <i>metering data services database</i> and from the <i>metering database</i>		The obligation to use the data file format is covered in metrology procedure part A. We suggest rather than deleting Rule 7.3.5 (f), the data file format requirement could be added to the Metering data provider obligations for delivery in Rule 7.11.2 (a) (7).
7.2.9 (c) (5)	the processing of <i>metering data</i> associated with <i>connection point</i> transfers and the alteration of <i>metering installations</i> where one or more devices are replaced ('meter churn').		The meter churn data management rules are already referred to in the existing metrology procedure in relation to part day data created by meter churn. The requirement under the Rules to comply with the

Clause reference	The service level procedures must specify requirements for	Clause reference	The <i>metrology procedure</i> must include
			<p>procedures authorised under the Rules for either metering providers or metering data providers in Rules 7.4.2 (bb) and 7.4.2A (d) adequately addressed this issue already.</p> <p>The reference to meter churn in Rule 7.2.9 (c) (5) is confusing as the meter churn guidelines are purely guidelines under Rule 7.3.4(j). The intent is the processing of the meter data for part days where there is meter churn, including the complexity of a change of meter type.</p>
		7.14.1 (c) (3)	the obligations of <i>responsible persons</i> , and Metering Providers and Metering Data Providers