

30 September, 2010

Mr John Pierce
Chairman
Australian Energy Market Commission
Level 16, 1 Margaret Street
Sydney NSW 2000

Lodged online at :www.aemc.gov.au

Dear Mr Pierce

**Consultation Paper on Specific Issues
National Electricity Amendment (Provision of Metering Data Services and Clarification
of Existing Metrology Requirements) Rule 2010**

Thank you for the opportunity to comment on two specific issues affecting this rule change proposal:-

- the responsibility framework for metering data services;
- arrangements for complex connection points;

arising from the consultation following the Draft Rule Determination *National Electricity Amendment (Provision of Metering Data Services and Clarification of Existing Metrology Requirements) Rule 2009*

CitiPower and Powercor Australia (Powercor) are Victorian electricity distributors who are registered by AEMO as Network Service Providers and will be directly affected by the outcomes arising from this proposal.

Responsibility for Metering Data Services

CitiPower and Powercor have previously submitted that it would be efficient for a single point of responsibility (Responsible Person) for appointing both the Metering Provider and the Metering Data Provider to ensure the compatibility of these increasingly complex functions and to ensure the efficient resolution of any issues related to either metering provision or metering data provision.

The AEMC 's revised policy position, as set out in the consultation paper, would achieve a single point of responsibility for connection points to the distribution system and CitiPower and Powercor support this policy position. CitiPower and Powercor accept that there may be good reasons why this approach should not be extended to wholesale metering, generally the responsibility of TNSP's, and that AEMO should remain responsible for metering data services where TNSP's are the responsible person.

Connection Points that exhibit complexity for the provision of Metering Data Services

CitiPower and Powercor accept that there are benefits from ensuring that a single MDP is appointed for connection points that exhibit complexity for the provision of Metering Data Services.

To further minimise the risk of metering data and associated settlement problems at such complex sites, which have the potential for major impact on the Electricity Market settlement process, it would be prudent to consider assigning responsibility in such situations directly to the TNSP as Meter provider and AEMO as responsible for provision of Metering Data Services. This would require removing the option for Market Participants to take any role as Responsible Person in appointing the Metering Provider or the Metering Data Provider. However, guidance should be provided in the rules by including criteria for AEMO to apply when it determines which installations have “special site or technology related conditions”.

Please see also drafting suggestions and comments attached below for your consideration.

Please do not hesitate to give me a call on (03) 9683 42982 or email to rherrmann@powercor.com.au if you require any further information in relation to this matter.

Yours sincerely



Rolf Herrmann
Manager Regulation

**Consultation Paper on Specific Issues
National Electricity Amendment (Provision of Metering Data Services and Clarification
of Existing Metrology Requirements) Rule 2010**

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 ~~as otherwise 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*.
- (c) AEMO is the *responsible person* for *interconnectors*.
- (d) AEMO must establish, maintain and *publish* relevant explanatory material that sets out the role of the *responsible person* consistent with this Chapter 7.

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)~~ clause 7.2.1A(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~~ and procedures authorised under the *Rules*;
 - (2) ~~through the establishment of additional processes if necessary~~ permit *Metering Data Providers* to provide *metering data services* ~~between the metering installation and the metering database~~;
- ~~(A)(3)~~ (3) 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)~~ clause 7.2.1A(e);
- (4) select the *Metering Data Provider* where:

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~~(i)~~(A) special site or technology related conditions exist, as determined by AEMO in accordance with ~~clause 7.2.1A(e)paragraph (d)~~; or

~~(ii)~~(B) the *financially responsible Market Participant* fails to select the *Metering Data Provider* in accordance with ~~clause 7.2.1A(b)(3)subparagraph (2)(B)~~,

~~(B)~~(5) require the *Metering Data Provider* chosen by the *financially responsible Market Participant* in ~~clause 7.2.1A(b)(3)subparagraph (2)(B)~~ to provide *metering data services* to that participant; and

~~(C)~~(6) require the *Metering Data Provider* chosen by AEMO in ~~clause 7.2.1A(b)(4)subparagraph (2)(C)~~ to provide *metering data services to AEMO* and to accommodate ~~the any~~ special site or technology related conditions ~~determined in accordance with clause 7.2.1A(e)~~ when providing those services;

~~(3)(c)~~ ~~The service level procedures must~~ incorporate ~~in the service level procedures~~ any ~~additional~~ processes ~~required~~ ~~established~~ by AEMO ~~for the purpose of to~~ fulfilling its obligations under ~~subparagraph (b)(2)clause 7.2.1A(b)~~.

~~(e)(d)~~ For the purpose of ~~clause 7.2.1A(b)(3)subparagraph (b)(2)(B)~~, AEMO is to be regarded as the *financially responsible Market Participant* for *interconnectors*.

~~(4)(e)~~ 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 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 *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)(f)~~ If a special site or technology related condition identified by AEMO ~~in the document published in accordance with clause 7.2.5(e)(1) 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 who is able~~ to accommodate the special site and technology condition by the date specified in ~~subparagraph (d)(1)clause 7.2.5(e)(1)~~.

~~(f)(g)~~ In the absence of such an agreement specified in ~~paragraph (e)clause 7.2.5(f)~~, 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.

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

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Comment [RH1]: Criteria for what constitutes "special site or technology related conditions" criteria should be incorporated into the Rules.

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(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*~~ unless the *Responsible Person* is the *Metering Data Provider*;
- (2) ensure that the *Metering Data Provider* chosen in ~~paragraph (h)~~ clause 7.2.5(g)(1) accommodates ~~any the~~ special site and technology related conditions as determined by AEMO in accordance with clauses 7.2.5(h) and 7.2.5(i) ~~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 clause 7.2.5(g)(1) 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 clause 7.2.5(i)(1) 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 clause 7.2.5(i)(1) subparagraph (i)(1).

(k) In the absence of such an agreement specified in ~~paragraph (j)~~ clause 7.2.5(j), AEMO may nominate one of the *responsible persons* to be the sole *responsible person* for those *metering installations*.

Comment [RH2]:

Consider deleting this clause 7.2.5(h).

This obligation to liaise with AEMO would extend to all metering installation creating an onerous and unnecessary workload. The obligation should only arise where AEMO has published special site and technology requirements for a metering installation which is adequately covered by clause 7.2.5(g)(2).

Comment [RH3]:

See comment clause 7.2.1A(e) above regarding the need for criteria to establish "special site or technology related conditions criteria."

Comment [RH4]:

The drafting is inconsistent with the discussion paper which refers to a single MDP at complex connection points. Should this reference to "responsible person" be replaced with a reference to the "Metering Data provider"?

Comment [RH5]:

See comment above regarding reference to "Responsible Person".

Comment [RH6]:

See comment above regarding reference to "Responsible Person".