

16 October 2009

Mr John Tamblyn  
Chairman  
Australian Energy Market Commission  
Level 5, 201 Elizabeth Street  
Sydney NSW 2000

Via website: [www.aemc.gov.au](http://www.aemc.gov.au)

Dear John,

### **Provision of Metering Data Services and Clarification of Existing Metrology Requirements Rule Change Proposal**

Grid Australia welcomes the opportunity to comment on the above Rule change proposal submitted by the Australian Energy Market Operator (AEMO) (formerly NEMMCO) and published by the AEMC on 27 August 2009.

Grid Australia makes this submission on behalf of National Electricity Market (NEM) electricity transmission network owners ElectraNet (South Australia), Powerlink Queensland (Queensland), SP AusNet (Victoria), Transend (Tasmania) and TransGrid (New South Wales).

In summary, Grid Australia supports the AEMO proposal to:

- abolish the *Metering Data Agent* deed arrangements and to establish the new *Metering Data Provider* category as a *Registered Participant* under the *Rules*; and
- make minor changes to clarify existing metrology requirements except as noted in Table 1 of this submission.

However, Grid Australia does not support the proposal to:

- remove AEMO's responsibility for *remote data acquisition* and the assignment of this responsibility to a *Participant*; and
- reallocate the responsibility for engaging *Metering Data Providers* for Type 1-4 *metering installations* from the *Financially Responsible Market Participant (FRMP)* to the *Responsible Person*.

Grid Australia considers that there are significant differences between the metering needs of the wholesale market (transmission connection points and interconnectors) and the metering needs of the retail market. Therefore, it is appropriate to maintain different processes and responsibilities for *remote data acquisition* and engaging *Metering Data Providers*.

Maintaining AEMO's responsibilities for *metering data collection*, in support of the operation of the wholesale market, and maintaining the *FRMP's* freedom to independently choose its preferred *Metering Data Provider* and preferred *Responsible Person* has the least overall cost impact. AEMO's costs in discharging this centralised responsibility will be far less than the costs required to duplicate these processes for each *Transmission Network Service Provider* or *FRMP* (where they elect to be the *Responsible Person*).

The wholesale market has been in operation for nearly 11 years and is a mature and stable market, with well established processes and participant relationships in regard to *National Electricity Market* metering. The proposed changes, if adopted, would have a significant impact on the wholesale market and result in increased costs with no demonstrable benefit. As such, the proposed changes, if applied to metering arrangements for the wholesale market, will clearly not further the *National Electricity Objective*.

The proposed changes are largely intended to address emerging distribution retail market issues and to rationalise relationships with respect to retail market metering, and should be confined to this market segment.

Grid Australia is particularly concerned about the potential impacts of the proposed changes on NEM stakeholders and service providers involved in the wholesale market, and that the associated costs and data risks have not been fully considered in the Rule change proposal.

Therefore, Grid Australia recommends that the AEMC not accept the proposals to:

- remove AEMO's responsibility for *remote data acquisition* and the assignment of this responsibility to a *Participant*; and
- reallocate the responsibility for engaging *Metering Data Providers* for Type 1-4 *metering installations* from the *Financially Responsible Market Participant* to the *Responsible Person*.

While Grid Australia recognises that this will introduce different processes between wholesale market metering and retail metering installations, Grid Australia considers that any associated costs will be minimal and significantly less than the costs to *Transmission Network Service Providers (TNSPs)* and *Financially Responsible Market Participants* in establishing new contractual arrangements and supporting processes (as would be required if the above aspects of the Rule change proposal were accepted).

The attachment sets out Grid Australia's concerns in more detail in response to the "Consultation Questions" outlined in the AEMC Consultation Paper.

Grid Australia would welcome the opportunity to clarify any aspect of this submission. If you require any further information, please contact David Craig, TransGrid's Protection and Metering Manager on (02) 4967 8734 in the first instance.

Yours sincerely,



Rainer Korte  
**Chairman**  
**Grid Australia Regulatory Managers Group**

## Grid Australia Comments on AEMC Consultation Questions

1. Do you agree that there is an issue with the current arrangements that should be addressed by amending the Rules? Please explain your view.

AEMO has raised 4 issues to be addressed by the proposed *Rules Change*:

1. Abolition of the *AEMO-MDA* deed arrangement and the establishment of a new Service Provider (*Metering Data Provider*) under the *Rules*;
2. Removal of AEMO's responsibility for remote data acquisition and the assignment of this responsibility to a Participant;
3. Reallocation of the responsibility for engaging *Metering Data Providers* for Type 1-4 metering installations from the *Financially Responsible Market Participant* to the *Responsible Person*; and
4. Minor changes to clarify existing metrology requirements.

The mechanism by which *Metering Data Service Providers* are accredited, registered and governed generally has no impact on *Registered Participants* and *Market Participants*. Whether this is by a deed or under a *Rules* governed registration process, the roles and functions performed remain essentially the same. Grid Australia has no objection to the proposal for *Metering Data Agents* to become registered service providers under the *Rules*.

However, Grid Australia does not support AEMO's proposal in relation to issues 2 and 3 above, with respect to transmission network connection points (including interconnectors).

Grid Australia does not support these aspects of the proposal for the following reasons:

- There are fundamental differences between the wholesale metering arrangements typically associated with the transmission network and the retail metering arrangements typically associated with distribution networks;
- *Transmission Network Service Providers*, who are generally the *Responsible Person* for transmission network connection points, are not both *Metering Providers* and *Metering Data Service Providers* contrary to the historical practice for *Distribution Network Service Providers* (there are a small number of exceptions such as SP AusNet in Victoria and Energy Australia for some points in NSW);
- *Transmission Network Service Providers* would need to establish internal *Metering Data Provider* service groups, develop software systems and become accredited, or need to engage third party *Metering Data Providers*. The use of third party *MDPs* would require the development and negotiation of new contracts, as well as the implementation of *MDP* performance and compliance monitoring processes and appointment of additional skilled personnel. New IT systems may also need to be developed and implemented to automate and manage some of these processes;
- Consequential increased metering management costs would arise and would, ultimately, need to be passed on to consumers;

- *Financially Responsible Market Participants* have existing contracts in place with *Metering Data Agents* for metering data services, including bundled Value Added services. The early termination of these contracts and development and implementation of new Value Added Services contracts will result in additional costs and added complexities for *MDPs* and *MPs*;
- Increased legal and commercial liabilities that will arise for the *Responsible Person* as a consequence of becoming responsible for metering data errors arising through *MDP* processes and *MDP/AEMO* interfaces. This is likely to lead to a risk premium being levied by *RPs* and *FRMPs*;
- *AEMO* (previously *NEMMCO*) has been solely responsible for the remote acquisition and data processes for the wholesale market metering for the past 11 years and has the accumulated experience and investment in staff. The retention of this centralised function for this market segment will be more cost effective and avoid duplication of activities and costs that will otherwise be incurred by all *TNSPs* and/or *FRMPs*; and
- Existing arrangements and processes are working well for the wholesale market metering and there is no real driver for a change of this nature in this market segment.

#### Retail and Wholesale Metering

*AEMO* states that “in practice the parties who perform metering data services for remote and manual collection are usually both *MDAs* and *MPs*”. While this may be true for retail metering, it is not true for the wholesale market metering.

For retail market metering, the *Rules* were changed to accommodate a gradual introduction of contestable metering arrangements into the retail market. Consequently, existing distribution businesses were prescribed the responsibility to continue to supply metering provision and meter data reading and billing services to their customers with manually read meters (types 5 and 6). Customers below the type 5 and 6 threshold could only have contestable metering as their metering equipment was upgraded to remote interval meters (or potentially in the future smart meters).

Hence metering provision and metering data services are regulated in this type 5 and 6 market segment and the distribution businesses have been required to maintain both service provision functions. This leads to the situation where the *Distribution Network Service Providers* are both *Metering Providers* and *Metering Data Service Providers* and therefore have direct control over metering and metering data services for type 5 and 6 meters.

For retail market remote read meters (largely type 3 and 4) the metering services are fully contestable. In this segment the retailer as the *FRMP* almost exclusively elects to be the *Responsible Person* and hence competitively sources an accredited *MP*. Whilst *AEMO* is the party responsible for the remote data acquisition, the retailer as the *FRMP* has the choice of *Metering Data Service Provider* and competitively sources an accredited *MDP*. The *FRMP* often chooses the same service provider business to supply the *MP* and the *MDP* services. Although the *FRMP* is not responsible for the remote data acquisition, through its contractual arrangements, it basically sits across the end to end data process. Retailers as the *Responsible Person* and *FRMP* for the majority of the contestable metering arrangements have developed the contracts and contract management approaches to manage the commercial and regulatory aspects of this service provider arrangement, however, they have not yet been subject to the

consequential legal liabilities that will arise if *AEMO* is no longer responsible under the *Rules* for remote data acquisition.

In contrast, metering services for the wholesale market are fully contestable. However, *Transmission Network Service Providers* in 4 out of 5 states<sup>1</sup> do not have Metering Data Provider functions and therefore, do not have direct control over metering data services.

Prior to the commencement of the National Electricity Market (NEM) in 1998, each of the *Transmission Network Service Providers* were also *Metering Data Service Providers* within their own jurisdictions. However, under the framework of the National Electricity Code, distribution business *Metering Data Agents* were allowed to perform metering data services for their own distribution business connections to the transmission network and this was taken up by the distribution businesses. Consequently, *Transmission Network Service Providers* discontinued providing metering data services from the commencement of the NEM.

Hence it needs to be clearly understood that in metering provision by transmission service providers for the wholesale market, where the liabilities and commercial risks associated with metering services are higher, the parties who perform metering provider services in the majority do not provide remote metering data collection services, but are *Metering Providers* only.

#### Metering Data Agent Engaged by Financially Responsible Market Participant

Grid Australia does not agree that there is an issue with the current arrangement where the Metering Data Agent is engaged by the *Financially Responsible Market Participant*. Grid Australia considers that *AEMO* has not demonstrated that a Rule change is warranted for the provision of metering services by transmission networks for the wholesale market.

The *FRMP*'s freedom to engage its preferred *Metering Data Provider* would become constrained where it does not wish to be the *Responsible Person*. Currently the *FRMP* is able to choose both the preferred *RP* and the preferred *MDP*. The *FRMP* also still has the freedom to enter into a metering services agreement with the *LNSP* to utilise the *LNSP*'s *RP*, *MPB* and *MDP* services (where available) effectively achieving the same outcome that *AEMO* is proposing, but without regulatory prescription. If the market perceived sufficient benefit for such an arrangement, then this can already be achieved through participant choice.

#### Other Issues

In regard to other points raised by *AEMO* in its submission, Grid Australia provides the following comments:

- When the National Electricity Code was first introduced there was clear intent to separate responsibility for metering data from the responsibility for the metering installations. NEMMCO was allocated the responsibility for metering data processing and settlement of the market. The *Responsible Person* was allocated responsibility for the provision, installation and maintenance of the physical metering installations. The *Responsible Person* was also responsible for ensuring the accuracy of the metering installations complied with the requirements of the Code (now *Rules*).

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<sup>1</sup> The exception is Victoria (SP-AusNet as a result of the acquisition of the Victorian *DNSP* TXU which owned the *MDA* Data and Measurement Solutions).

The engagement of the Metering Data Agent was allocated to the *Financially Responsible Market Participant* who was typically a retail business or a generating company. The retail businesses usually had their own internal Metering Provider and Metering Data Agent service providers and were free to elect to use these providers for all metering installations associated with their network. The generator companies did not have internal Metering Provider and Metering Data Agent service providers and generally relied on the *Transmission Network Service Providers* to perform these services.

As mentioned above, *TNSPs* discontinued providing *MDA* services at the commencement of the NEM, so generation company *FRMPs* have engaged accredited *MDAs* to provide these services for the past 11 years.

This means that *TNSPs* do not have commercial contracts and other processes established for engaging *Metering Data Providers* and this has generally been the status since 1998. *TNSPs* are also unaware of what value added metering data services its customers currently have in place with their engaged *Metering Data Agents*.

Registered *TNSPs* that are exceptions to this arise where a *TNSP* is also a *DNSP* and has a Metering Data Agent associated with its *DNSP* business (e.g. TCA and SP-AusNet).

- To re-allocate metering data collection responsibilities to the *TNSP Responsible Person* introduces a ‘middle man’ between the *FRMP* and the Metering Data Agent and this will increase the costs of this process due to double handling and the cost for *TNSPs* to gear up to provide the *MDA* service.
- Transferring metering data collection responsibilities will increase the *Responsible Person’s* legal liabilities and compliance monitoring costs in accordance with its obligations under the proposed new clause 7.2.5(g)(1), which would need to be ultimately passed through to customers.

This may also introduce conflicting requirements where a *Metering Data Provider* has to deal with multiple sets of compliance requirements from different *TNSPs*, which would result in increased *MDP* compliance costs.

- The *FRMPs* have developed expertise in engaging *MDAs* and already have existing contractual arrangements and processes in place for collecting metering data and associated data processes and therefore there is a zero or minimal cost for maintaining this arrangement.
- The creation of a *Metering Data Provider* category under the *Rules* can occur independently from the issue of which party is required by the *Rules* to engage the *Metering Data Provider*.

In regard to the fourth issue raised by AEMO above, i.e. minor changes to clarify metrology requirements, Grid Australia in general supports the proposed clarifications, except as noted in the table of comments to specific clause changes at the end of this submission.

2. What impacts (including operational and procedural impacts) is the Rule change proposal likely to have on stakeholders?

Operational:

- *TNSPs* would need to develop and negotiate new metering services contracts to include metering data collection services
- The new metering services contracts may need to include customer requested value added services. This may restrict the number of service providers capable of offering these services, or alternatively, may force *TNSPs* to engage multiple *Metering Data Providers* (higher resultant overheads and further complexity).
- *AEMO's* prerogative to nominate the *Metering Data Provider* to be engaged for transmission network connection points and for interconnectors (see proposed clause 7.2.5(ab)) may require the *Responsible Person* to establish additional *MDP* contracts in order to comply with the *AEMO* nomination, resulting in increased administrative costs. Conflicts between the *RP*-engaged *MPB* and the *AEMO* nominated *MDP* will also need to be managed by the *RP* without enforcement powers, further increasing administrative costs.

The current drafting of the proposed clause does not limit *AEMO's* prerogative to the specific cases cited in its proposal, but would apply to all transmission network connection points. This clause if it is to be included needs to be re-drafted so as to apply only to those transmission network connection points which are used for *AEMO* metering data cross validations or inter-regional interconnectors.

- *TNSPs* would need to develop additional compliance monitoring processes and allocate staff and resources for performing these processes.
- *TNSPs* would be required to invest in staff to become familiar with metering data collection and settlement data processes in order to resolve metering data issues and to monitor *MDP* compliance.
- There will be an increased interface requirement between the *Metering Data Provider* and the *TNSP*, and between the *TNSP* and the *FRMP* to resolve data problems associated with value added services. This also will increase administrative costs.

Procedural:

- It is unclear from the proposed *Rule* change as to what additional *AEMO* audits, internal self-audits and compliance monitoring processes would be required, if the responsibility for metering data collection is transferred to the *Responsible Person*. New procedures to manage this would be required.
- Changed protocols – *AEMO* would expect the *Responsible Person* in the future to resolve all metering issues (including data issues). The *Responsible Person* would then be required to follow up the *Metering Provider* and *Metering Data Provider* in order to resolve these issues. There will inevitably be problems of message distortion and time lost.

- From time to time data issues may arise that may require extended periods to resolve. New procedures and possible further *Rules* changes would be required to establish protocols for obtaining exemptions to comply with regulatory *Metering Data Provider* requirements whilst corrective actions are completed. (Similar in concept to the existing Exemption Request process for metering installations faults).

3. What impacts, if any, is the Rule change proposal likely to have on changes arising from the development, adoption or use of advanced metering installations and other “smart meter” technology?

Grid Australia is, generally, not involved in the development, adoption, and use of advanced metering installations and other smart meter technology. Grid Australia members are involved in metering arrangements with a very small number of the largest customers. This issue is much more relevant to the distribution network businesses, and no comments are offered here.

4. Will the Rule change proposal contribute, or be likely to contribute, to the achievement of the National Electricity Objective? Please explain your view.

While some aspects of the proposed *Rule* change could contribute to the achievement of the *National Electricity Objective* other aspects clearly will not.

The proposed Rule change would clarify the roles, responsibilities and interfaces between the proposed *Metering Data Provider*, *Financially Responsible Market Participants*, *Local Network Service Providers*, *Metering Providers* and *AEMO*. However, Grid Australia disputes that the changes are optimal or needed for certain market segments, particularly in respect to the party designated to engage the new *Metering Data Provider* specifically in relation to transmission network connected participants.

The proposed Rule would also clarify some of the existing metrology requirements, however, some refinement of some of the proposed changes is suggested (refer Table 1 – Proposed Clause Amendment Comments).

Unfortunately, the consultation process employed by *AEMO*, prior to submitting this proposal, did not involve sufficient engagement to capture and understand the requirements of stakeholders and metering providers associated with wholesale market metering services, in particular transmission network service businesses, generation companies and *Metering Data Agents*.

*AEMO* cites in its Rule change proposal that it included a number of consultation points with the Metrology Reference Group (MRG) and takes into account the concerns raised by the MRG and the solutions discussed. It further states that the MRG includes representatives from *Distribution Network Service Providers*, retailers and metering service providers.

However, the focus of this group is on retail market issues and it is not representative of the transmission network participants, generator *Market Participants* or *Metering Data Agents* who will be directly impacted by the proposed *Rule* change. In addition, dissenting views forwarded to the Metering Reference Group were not mentioned in the *Rule* change proposal.

5. What costs are stakeholders likely to incur, and what benefits are likely to accrue to stakeholders, if the proposed Rule is made?

If the proposed Rule is made unchanged, then the majority of *TNSPs* will incur significant additional costs for:

- reviewing legal liabilities for the extended Responsible Person role;
- creating new legal contracts for providing customers with combined Responsible Person, metering provider and Metering Data Provider services
- negotiating new contracts with all transmission connected customers
- creating and negotiating new legal contracts with Metering Data Providers
- establishing internal resources to manage these new interfaces and to monitor MDP compliance

These processes may also be further complicated by customer preferred value-added services, dependent upon whether these are to be incorporated into the *FRMP-LNSP* agreement, or whether these are to remain exclusively between the *FRMP* and *MDP*.

One outcome may be a need for *FRMPs* to develop and negotiate new value-added service contracts with *MDPs* for transmission network connection points. As these services are currently incorporated into existing *FRMP-MDA* contracts, this can only incur additional costs to both the *FRMPs* and *MDPs*.

It is difficult to see any appreciable benefit for the *MDP* or *TNSP* under the proposed new arrangements. The benefits for *FRMPs* would be minor or even immaterial, if they are involved with multiple *LNSPs* and could potentially be dealing with several *MDPs*.

*AEMO* costs would be expected to reduce to the extent that *AEMO* is no longer required to administer *MDA* deed processes. However, this would be more than offset by the *MDP* accreditation, registration and assumed auditing process. (It is noted that the proposed Rule does not contain any requirement for the auditing of the new *AEMO* accredited *MDP* service providers).

6. What transitional arrangements, if any, would be required to ensure stakeholders can comply with the proposed changes?

The existing deed arrangement for metering data collection and processing services would need to continue for at least 12 months from commencement of the *Rule Change* in order to allow *Responsible Persons* to develop and secure new *Metering Data Provider* contracts and new customer *Responsible Person* contracts. (This assumes that all parties are willing to agree to the early termination of any existing contracts for equivalent services). It should be emphasised that most *TNSPs* will be starting from a 'zero base', not having been involved in these processes for the past 11 years.

If the selection of the *MDP* remains exclusively with the *FRMP*, then existing metering data services contracts can remain unchanged irrespective of whether the *MDPs* are engaged by

AEMO deems or as accredited service providers under this Rule change proposal, i.e. minimal, if any, transitional arrangements would need to apply.

The following table provides comments with respect to the proposed changes to the individual Rule clauses.

**Table 1: Proposed Clause Amendment Comments**

| <b>Clause</b> | <b>Comments</b>  |
|---------------|--|
| 7.1.1 (a)     | Acceptable   |
| 7.1.1(b)(3)   | Acceptable   |
| 7.1.1(b)(8)   | Acceptable   |
| 7.2 Heading   | Acceptable   |
| 7.2.1(a)      | Delete the proposed clause 7.2.1(a)(2). Instead transfer this proposed clause to 7.2.2(c) as:<br><p>“A <i>Market Participant</i> is responsible for engaging a <i>Metering Data Provider</i> to provide <i>metering data services</i> in relation to each <i>metering installation</i> for which it is the <i>Financially Responsible Market Participant</i>”.</p>   |
| 7.2.1(b)      | Acceptable   |
| 7.2.3(c)(2)   | Delete the proposed changes. Leave the clause unchanged ( <i>Rules</i> version 30).  |
| 7.2.5 Heading | Delete the proposed changes. Leave the clause unchanged ( <i>Rules</i> version 30).  |
| 7.2.5(aa)     | Delete the proposed inserted clause.   |
| 7.2.5(ab)     | Delete the proposed clause 7.2.5(ab). Instead transfer this clause to 7.2.2(d) as:<br><p>“AEMO may nominate the <i>Metering Data Provider</i> to be engaged under 7.2.2(c) by the <i>Financially Responsible Market Participant</i> for <i>transmission network connection points</i> and for <i>interconnectors</i> and the <i>Financially Responsible Market Participant</i> must comply with such nomination”.</p> <p>AEMO’s explanation for this new clause is that this clause is to be used for exceptional cases, where AEMO performs cross-validations of the metering data and where AEMO is the <i>FRMP</i> for interconnectors across Regions. AEMO wants to be able to nominate the service provider based in these capabilities in these cases.</p> <p>However, the glossary term “transmission network connection points” refers to all connection points on a transmission network and not just the exceptional cases contained in AEMO’s explanatory notes.</p> <p>For the cases where AEMO is the <i>FRMP</i>, then AEMO can engage its preferred <i>MDP</i> directly and AEMO as the <i>FRMP</i> should pay for these <i>MDP</i> services.</p> <p>For the cases where AEMO performs cross-validations of the metering data, then AEMO should establish a special category defining these connection points and change the wording in the proposed clause to limit AEMO’s discretionary nominations to just those transmission network connection points meeting the stated criteria.</p> |
| 7.2.5(b)(3)   | Delete the proposed inserted clause.   |
| 7.2.5(d)(1)   | Acceptable   |
| 7.2.5(d)(2)   | Acceptable   |
| 7.2.5(d)(4)   | Acceptable   |
| 7.2.5(d)(5)   | Acceptable   |
| 7.2.5(d)(8)   | Acceptable   |

| Clause             | Comments  |
|--------------------|---|
| 7.2.5(g) All parts | Relocate to clause 7.2.2(e) and substitute the words “ <i>The Market Participant</i> must, for each <i>metering installation</i> for which it is the <i>Financially Responsible Market Participant</i> . “ in place of the initial sentence in the proposed clause 7.2.5(g).  |
| 7.2.8 All parts    | Acceptable  |
| 7.2.9 All parts    | Acceptable  |
| 7.2A Heading       | Acceptable  |
| 7.2A.4(h)          | Acceptable  |
| 7.2A.4(i)          | Acceptable  |
| 7.3.1A(b)          | Acceptable  |
| 7.3.1 all parts    | Acceptable  |
| 7.3.2(a)           | Acceptable, however the removal of the use of the term “revenue metering” needs to be consistently applied through the remainder of Chapter 7. AEMO’s proposal also needs to remove the word ‘revenue’ from clause S7.2.4 (c).  |
| 7.3.3 all parts    | Acceptable  |
| 7.3.4 Heading      | Acceptable  |
| 7.3.4(b)           | Acceptable  |
| 7.3.5 All parts    | Acceptable  |
| 7.3.6 All parts    | Acceptable  |
| 7.3.7(a)           | Acceptable  |
| 7.3.7(a)(1)        | The 2 business days response time for effecting repairs should commence from when the <i>Responsible Person</i> becomes aware or should reasonably have become aware of the outage or malfunction.  |
| 7.3.7(a)(2)        | The 10 business days response time for effecting repairs should commence from when the <i>Responsible Person</i> becomes aware or should reasonably have become aware of the outage or malfunction.   |
| 7.3.7(c)           | Acceptable  |
| 7.3.7(d)           | It may not always be possible to advise the <i>Responsible Person</i> of an outage or malfunction of a metering installation within sufficient time to enable the <i>Responsible Person</i> to meet its obligations under paragraph (a). This clause should confer a requirement for other participants and service providers who become aware of an outage or malfunction to notify the <i>Responsible Person</i> for the <i>metering installation</i> immediately, or as soon as practical.<br><br>This recommended change prevents the <i>Responsible Person</i> being held accountable for the delays caused by <i>Registered Participants, Metering Providers</i> and <i>Metering Data Providers</i> . |
| 7.3A Heading       | Acceptable  |
| 7.3A All parts     | Acceptable  |
| 7.4 Heading        | Acceptable  |
| 7.4.1 Heading      | Acceptable  |
| 7.4.1A             | Acceptable  |
| 7.4.2(bb)          | Acceptable  |

| Clause             | Comments   |
|--------------------|--|
| 7.4.2(bc)          | All changes acceptable except the insertion of the words “retention of quality systems”. <i>AEMO</i> or the <i>AEMO</i> appointed Metering Provider would need to apply separately for its own quality accreditation for the transferred de-registered Metering Provider systems. Quality accreditation is granted to an organisation, the expertise of its people and encompasses more than the transferred systems.  |
| 7.4.2A             | Acceptable   |
| 7.4.3 Heading      | Acceptable   |
| 7.4.3 All parts    | Acceptable   |
| 7.5.1(a)           | Acceptable   |
| 7.5.2(a)           | Acceptable   |
| 7.6.3 Heading      | Acceptable   |
| 7.7 Heading        | Acceptable   |
| 7.7(a)(9)          | Acceptable   |
| 7.7(b)             | Acceptable   |
| 7.7(c)             | The original clause should be retained and a new clause added:<br><i>7.7(ca)</i> The <i>Metering Data Provider</i> must ensure that access is only provided to metering data from the metering data services database to persons eligible to receive metering data in accordance with paragraph (a).   |
| 7.7(g)             | Acceptable   |
| 7.8.1(c)           | Acceptable   |
| 7.8.1(e) All parts | Acceptable   |
| 7.8.2 All parts    | Acceptable   |
| 7.8.4 Heading      | Acceptable   |
| 7.8.4 All parts    | Acceptable   |
| 7.9.1 All parts    | Acceptable   |
| 7.9.2 All parts    | Reject the proposed deletion of this clause and modify the existing clause as follows:<br><b>7.9.2 Remote acquisition of data</b><br>(a) <i>AEMO</i> is responsible for the <i>remote acquisition</i> of the <i>metering data</i> for <i>transmission network connection points</i> and for storing this data as <i>settlements ready data</i> in the <i>metering database</i> .<br>(1) If remote acquisition becomes unavailable, <i>AEMO</i> must arrange with the <i>Responsible Person</i> to obtain the relevant <i>metering data</i> .<br>(b) The <i>Financially Responsible Market Participant</i> is responsible for the <i>remote acquisition</i> of the <i>metering data</i> for <i>distribution network connection points</i> .<br>(1) The <i>Metering Data Provider</i> is responsible for storing this <i>metering data</i> in the <i>metering data services database</i> .<br>(2) If remote acquisition becomes unavailable, the <i>Metering Data Provider</i> must arrange with the <i>Responsible Person</i> to obtain the relevant <i>metering data</i> . |
| 7.9.3 All parts    | Acceptable   |
| 7.9.4 All parts    | Acceptable. It is noted that the deletion in 7.9.4(d) of the requirement for <i>AEMO</i> to use a method agreed with the <i>Market Participant</i> and Local Network Service Provider where metering data fails validation is effectively covered in the Metrology Procedure Part B for Types 1-4 metering installations.  |
| 7.9.5(c)           | Acceptable   |

| Clause                   | Comments   |
|--------------------------|--|
| 7.9.5(d)                 | Add the words “in the metering data services database” at the end of the sentence.   |
| 7.10                     | Acceptable   |
| 7.11 Heading             | Acceptable   |
| 7.11.1 All parts         | Acceptable   |
| 7.11.2 All parts         | Acceptable   |
| 7.11.3 All parts         | Acceptable   |
| 7.11.4 All parts         | Acceptable   |
| 7.11.5 All parts         | Acceptable   |
| 7.12 All parts           | <p>Acceptable except for the changes from “metering point” to “connection point”.</p> <p>The accuracy requirements for a metering installation should always be contingent upon the amount of energy passing through the metering installation.</p> <p>For example, consider a substation with a single customer connected by five separate feeders (5 registered connection points) with the energy supplied via two HV/LV transformers.</p> <p>The energy passing through the two transformer connections onto the LV bus achieves Type 1 energy levels.</p> <p>The energy passing through the five feeder connections to the LV bus achieves Type 2 energy levels in each feeder.</p> <p>If the accuracy requirements are based on the energy passing through the connection points, then for transformer metering arrangements only Type 2 metering installations would be required despite Type 1 energy levels passing through the metering installations.</p> <p>However, if accuracy requirements are based on the energy passing through the metering installations, then for transformer metering arrangements Type 1 metering installations would be required. This is more appropriate for the energy being metered.</p> |
| 7.14.1(c) All parts      | Acceptable   |
| 7.14.2(h)                | Acceptable   |
| 7.14.3 All parts         | Acceptable   |
| 7.14.4 All parts         | Acceptable   |
| Schedule 7.1             | Under Metering data services column change “Responsibility:” box from “ <i>Responsible Person</i> ” to “ <i>Financially Responsible Market Participant</i> ”   |
| S7.2.1 All parts         | Acceptable   |
| Table S7.2.3.1           | <p>All changes acceptable, however, the title of column 2 “Volume Limit per annum per connection point” should be changed to “Volume limit per annum per metering point” as recommended above for clause 7.12.</p> <p>It appears this change from “metering point” to “connection point” was introduced in version 7 of the National Electricity Code in 2000. However, it was only introduced in the heading of this table and all other references in the text of Chapter 7 retained the reference to energy passing through the metering point.</p>   |
| Table S7.2.3.1 All Items | Acceptable   |
| S7.2.3(b)                | Acceptable   |
| S7.2.4(a) Table          | Acceptable   |

| <b>Clause</b>          | <b>Comments</b>   |
|------------------------|---|
| S7.2.4(d)              | Acceptable  |
| S7.2.5                 | Acceptable  |
| S7.2.6.1(a)            | All changes acceptable except for the replacement of “metering point” by “connection point”. (Refer clause 7.12 above).                             |
| S7.2.6.1(b)            | All changes acceptable except for the replacement of “metering point” by “connection point”. (Refer clause 7.12 above).                             |
| Table S7.3.2           | Acceptable  |
| Table S7.3.3           | Acceptable  |
| S7.4.2(b)              | Acceptable  |
| Table S7.4.1           | Acceptable  |
| Table S7.4.3           | Acceptable  |
| Table S7.4.4           | Acceptable  |
| S7.4.3 All parts       | Acceptable  |
| S7.4.4 All parts       | Acceptable  |
| S7.4.5(c)(1)           | Acceptable  |
| S7.5.2 All parts       | Acceptable  |
| Schedule 7.6 All parts | Acceptable except for S7.6.3(b) which needs to have “ <i>Financially Responsible Market Participant</i> ” added as one of the list of participants. |
| Chapter 10<br>Glossary | Acceptable  |