

SP AusNet Submission AEMC Consultation Paper on Specific Issues Meter Data Provision

Submitted 5 October 2010

About SP AusNet

SP AusNet is a major energy network business that owns and operates key regulated electricity transmission and electricity and gas distribution assets located in Victoria, Australia. These assets include:

- A 6,574 kilometre electricity transmission network indirectly servicing all electricity consumers across Victoria;
- An electricity distribution network delivering electricity to approximately 575,000 customer connection points in an area of more than 80,000 square kilometres of eastern Victoria; and
- A gas distribution network delivering gas to approximately 504,000 customer supply points in an area of more than 60,000 square kilometres in central and western Victoria.

SP AusNet's purpose is to provide our customers with superior network and energy solutions. The SP AusNet corporate values are :

- Safety: is our way of life. Protect and respect our people and our community.
- Passion: to bring energy and excitement to what we do. Be innovative by continually applying creative solutions to problems.
- Teamwork: to support, respect and trust each other. Continually learn and share ideas and knowledge.
- Integrity: to act with honesty and to practise the highest ethical standards.
- Excellence: to take pride and ownership in what we do. Deliver results and continually strive for the highest quality.

For more information visit: www.sp-ausnet.com.au

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1 Comments on the AEMC position on the two issues

Re Issue One: Sites with the TNSP as RP

There are strong reasons to have a single Participant being responsible for the end to end data process. We consider that this should be the default position and hence broadly support the proposed AEMC approach in this Paper regarding a single Responsible Person appointing all service providers as per the original AEMO proposal. We consider, whilst formally not a factor in this Rules change, that this approach best supports the potential models for service provision for smart meters¹. However we also recognise at least some of the arguments made by the TNSPs that, whilst they are the best party to be the Responsible Person for the provision of the metering installation, they do not have the capabilities in place to support their involvement in the appointment of the metering services provider. Hence in our second round submission we considered that AEMO remaining as responsible for data services was an option.

Re Issue Two: Sites with complexity with respect to MDP services

There are also strong reasons why for complex sites with complicated data provision requirements, that MDP services should be carried out by suitably knowledgeable service providers, and with an aim of maintaining consistency.

The “special” Responsible Person arrangements resulting from these positions do of course complicate the regulatory basis of the Responsible Person role and the provision of metering data services as demonstrated by the extensive proposed Chapter 7 drafting included in the Paper.

SP AusNet makes comments in Section 4 below on this drafting.

2 Clarity of scenarios and arrangements covered by the AEMC drafting

A key drafting aim which we have attempted to consider in our detailed comments is to ensure that similar obligations as much as possible use consistent paragraph construction, and wording and terminology. It has been difficult to make comments on this aspect because we have not seen the full drafting of Chapter 7 proposed by AEMC.

The table below details what we consider are the site and RP scenarios and options covered by the Rules changes under consideration. This table attempts to set out our understanding of what AEMC is targeting to establish as the responsibility arrangements for each of these options. The drafting proposed by AEMC was not as clear as desired and hence we are not absolutely confident that this table is aligned with the AEMC view. To ensure that the AEMC’s proposed arrangements are absolutely clear to industry for the next round of consultation, we strongly recommend that a table of this sort be included in the support material for that consultation.

The detailed comments on each of the Rules clauses drafted in the table in Section 4 below are based directly on this understanding of the scenarios.

¹ Although this consultation is firmly not covering Smart meter responsibility and service provider arrangements it would appear that these are likely to significantly impact the broad model in Chapter 7 which is the basis of this Rules change.

1 Interconnector Installation	
RP = AEMO 7.2.1 (c)	
MP per AEMO (as RP) choice 7.2.1 (a) (1)	MDP per AEMO (as RP) choice 7.2.1 (a) (2)
2 Transmission Installation	
2.1 Non special	
2.1.1 FRMP chooses RP = TNSP	
RP = TNSP	Data responsibility = AEMO 7.2.1A (a)(2)
MP = TNSP 7.2.1A (a)(1)	MDP per FRMP choice Any accredited MDP OK 7.2.1A (b)(B) If FRMP does not choose then AEMO choice 7.2.1A (b)(B)(ii)
2.1.2 FRMP RP	
RP =FRMP	
MP per FRMP (as RP) choice 7.2.1 (a) (1) Could be TNSP but not mandatory	MDP per FRMP (as RP) choice 7.2.1(a)(2) Any accredited MDP OK If FRMP does not choose No Rule coverage (expectation is that the RP MUST choose a MDP under 7.2.1(a)(2))

2.2 Special	
2.2.1 FRMP chooses RP = TNSP	
RP = TNSP	Data responsibility = AEMO 7.2.1A (a)(2)
MP = TNSP 7.2.1A (a)(1)	MDP per FRMP choice 7.2.1A (b)(B) Only some MDPs OK (AEMO agreement/veto) 7.2.1A (d) If FRMP does not choose then AEMO choice 7.2.1A (b)(B)(ii) If FRMP does not choose AEMO agreed MDP then AEMO choice No Rule coverage
2.2.2 FRMP RP	
RP =FRMP	
MP per FRMP (as RP) choice 7.2.1 (a) (1) Could be TNSP but not mandatory	MDP per FRMP (as RP) choice 7.2.1(a)(2) Only some MDPs OK (AEMO agreement/veto) 7.2.1A (d) If FRMP does not choose No Rule coverage (expectation is that the RP MUST choose a MDP under 7.2.1(a)(2)) If FRMP does not choose AEMO agreed MDP then AEMO choice No Rule coverage

2.3 Dual FRMPS + Non special	
2.3.1 FRMPs agree RP = TNSP If the FRMPs do not agree AEMO appoints the RP 7.2.4 (b) & (c)	
RP = TNSP	Data responsibility = AEMO 7.2.1A (a)(2)
MP = TNSP 7.2.1A (a)(1)	MDP per FRMPs choice Any accredited MDP OK 7.2.1A (b)(B) FRMPs must agree on the MDP 7.2.1A (e) If FRMPs do not choose then AEMO choice 7.2.1A (b)(B)(ii) If FRMPs cannot agree then AEMO choice 7.2.1A (f)
2.3.2 FRMPs agree which is the RP If the FRMPs do not agree AEMO appoints the RP 7.2.4 (b) & (c)	
RP =FRMP	
MP per FRMP (as RP) choice 7.2.1 (a) (1) Could be TNSP but not mandatory	MDP per FRMP (as RP) choice 7.2.1(a)(2) Any accredited MDP OK If FRMP does not choose No Rule coverage (expectation is that the RP MUST choose a MDP under 7.2.1(a)(2))

3 Non Transmission Installation	
3.1 Non special	
3.1.1 FRMP chooses RP = LNSP	
RP =LNSP	
MP per LNSP (as RP) choice 7.2.1 (a) (1)	MDP per LNSP (as RP) choice 7.2.1(a)(2) Any accredited MDP OK If LNSP does not choose No Rule coverage (expectation is that the RP MUST choose a MDP under 7.2.1(a)(2))
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3.3.1 FRMPs agree RP = LNSP If the FRMPs do not agree AEMO appoints the RP 7.2.4 (b) & (c)	
RP =LNSP	
RP with each FRMP or a single joint agreement 7.2.4(a)	
MP per LNSP (as RP) choice 7.2.1 (a) (1)	MDP per LNSP (as RP) choice 7.2.1(a)(2) Any accredited MDP OK If LNSP does not choose No Rule coverage (expectation is that the RP MUST choose a MDP under 7.2.1(a)(2))

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<p>3.4 Dual FRMPS + Special</p>	
<p>3.4.1 FRMPs agree RP = LNSP If the FRMPs do not agree AEMO appoints the RP 7.2.4 (b) & (c)</p>	
<p>RP =LNSP RP with each FRMP or a single joint agreement 7.2.4(a)</p>	
<p>MP per LNSP (as RP) choice 7.2.1 (a) (1)</p>	<p>MDP per LNSP (as RP) choice 7.2.1(a)(2) Only some MDPs OK (AEMO agreement/veto) 7.2.5 (i) If LNSP does not choose No Rule coverage (expectation is that the RP MUST choose a MDP under 7.2.1(a)(2)) If LNSP does not choose AEMO agreed MDP then AEMO choice No Rule coverage</p>

3.4.2 FRMPs agree which is the RP

If the FRMPs do not agree AEMO appoints the RP

7.2.4 (b) & (c)

RP =FRMP

MP per FRMP (as RP) choice
7.2.1 (a) (1)

MDP per FRMP (as RP) choice
7.2.1(a)(2)

Only some MDPs OK (AEMO agreement/veto)

7.2.5 (i)

If FRMP does not choose

No Rule coverage (expectation is that the RP MUST
choose a MDP under 7.2.1(a)(2))

If FRMP does not choose AEMO agreed MDP then AEMO
choice

No Rule coverage

3 SP AusNet comments on broad aspects of the consultation

3.1 Definition of special sites or those with technology related conditions

As stated by AEMC these “special sites or those with technology related conditions” include sites that have:

- a common communications network with multiple FRMPs,
- common metering installation components (including how check metering is provided),
- virtual metering installations that are a result of remote metering points on ring feeders,
- generation in-feeds on multi-use feeders, and
- any other connection point or set of connection points requiring a common or unique MDP (such as interconnection between distribution networks).

SP AusNet consider that an expanded version of this listing, and/or a detailed identification of the characteristics of special sites or those with technology related conditions, be identified in a formal market metrology document (a guideline?) so that with a high degree of certainty such a site is clearly defined for all involved.

3.2 Responsible Person choice for special sites or those with technology related conditions

Whilst SP AusNet recognise that this is not within the direct scope of the current consultation, we consider that consideration should be given to allocating network service providers as the responsible person for critical sites which impact on multiple Participants. Hence the TNSP would become the exclusive responsible person for all transmission and related complex connections, and the distributor for network cross boundary metering and related complex connections. These network service providers have the necessary high voltage metering skills, and safe and relatively easy access to their own transmission and distribution stations.

Any potential benefits from metering competition in this space is very small compared with the energy flows and therefore related costs recorded by these installations. The flow on from metrology issues can be very high.

4 SP AusNet comments on specific drafting clauses

Clause	AMO Proposed Wording	SP AusNet Issues	SP AusNet Suggested Wording
7.2.1 (a) (2)	(a) The <i>responsible person</i> is the person responsible for: (2) the collection of <i>metering data</i> from each <i>metering installation</i> for which it is responsible, the processing of that data and the delivery of the processed data to the <i>metering database</i> , except where specified otherwise in clause 7.2.1A(a);	1 the responsibility of the RP for data services extends beyond the delivery of data to the metering database to the delivery of data to the retailers and distributor 2 the wording of the original AEMO submission suggested the use of the term “provision of <i>metering data services</i> ”. This is consistent with the form of 7.2.1 (a) (1) (the equivalent clause re MP services) overcomes the issue #1 above	(2) the provision of <i>metering data services</i> from each <i>metering installation</i> for which it is responsible, except where specified otherwise in clause 7.2.1A(a);
7.2.1 (d)	(d) <i>AEMO</i> must establish, maintain and <i>publish</i> relevant explanatory material that sets out the role of the <i>responsible person</i> consistent with this Chapter 7.	It is unclear why the concept of a “guideline” has been changed to “explanatory material”? SP AusNet made comments in our previous submissions re the lack of clarity of what role a “guideline” played in the hierarchy of metrology regulatory documents. We expressed concerns that, whereas a guideline as originally conceived was just that: “additional detail for the assistance of a party needing to meet an obligation”, but that recently these documents have been expanded to include additional obligations.	AEMC should produce a explanatory document of the role of a “guideline” v’s “explanatory material” so that the distinction is clear. This is consistent with the obligations included in the AEMC Draft Decision for AEMO to carry out a review of the metrology document structure and rationalise content of each of the “levels” of documents.

Clause	AMO Proposed Wording	SP AusNet Issues	SP AusNet Suggested Wording
		<p>We would be happy if the term “explanatory material” was a return to the original concept of providing guidance only, but it needs to be clearly defined if this is the case.</p> <p>If not, then the term “guideline” should be reinstated.</p>	
7.2.1A (a)	(a) Where the <i>Market Participant</i> has selected a <i>responsible person</i> for a <i>metering installation</i> in accordance with clause 7.1.2(a)(2) and that <i>responsible person</i> is a <i>Transmission Network Service Provider</i> :	Wording is unnecessarily complicated.	(a) Where the <i>Market Participant</i> has selected a <i>Transmission Network Service Provider</i> as the <i>responsible person</i> for a <i>metering installation</i> in accordance with clause 7.1.2(a)(2)
7.2.1A (a)	(2) <i>AEMO</i> is responsible for the collection of <i>metering data</i> from that <i>metering installation</i> , the processing of that data and the delivery of the processed data to the <i>metering database</i> .	<p>1 the responsibility of the RP for data services extends beyond the delivery of data to the metering database to the delivery of data to the retailers and distributor</p> <p>2 the wording of the original AEMO submission suggested the use of the term “provision of <i>metering data services</i>”. This is consistent with the form of 7.2.1A (a) (1) (the equivalent clause re MP services) overcomes the issue #1 above</p>	(2) <i>AEMO</i> is responsible for the provision of <i>metering data services</i>
7.2.1A (b)	(b) In performing its role under subparagraph (a)(2), <i>AEMO</i> must:	Whilst it is clear that from this lead in paragraph that 7.2.1A (b)(1), (2) and (3)	Refer SP AusNet comments below on individual clauses applicable to sites

Clause	AMO Proposed Wording	SP AusNet Issues	SP AusNet Suggested Wording
		<p>are intended to be applicable not to the general situation of MDP choice as detailed in 7.2.1(a)(2) but rather only to the situation where the TNSP is the RP and AEMO has the role of selecting the MDP, it is not clear that 7.2.1A (c), (d), (e) and (f) are also only applicable to this scenario.</p> <p>Note as per our comments on 7.2.1A (c) that this is not applicable to this TNSP as RP scenario and further also suggest that it is not require.</p>	<p>where the TNSP is the RP.</p>
7.2.1A (b)(1)	<p>(1) comply with the processes for the collection, processing and delivery of <i>metering data</i> from the <i>metering installation</i> to the <i>metering database</i> in accordance with the requirements of the procedures authorised under the <i>Rules</i>;</p>	<p>1 the responsibility of the RP for data services extends beyond the delivery of data to the metering database to the delivery of data to the retailers and distributor</p> <p>2 as raised in SP AusNet's earlier submissions and supported by AEMC in other clauses, the RP's role is generally to "ensure" not actually carry out the actions.</p> <p>2 Wording used in AEMC Draft Decision 7.2.2 (d) (1) and AEMO proposal 7.2.5(g)(3) would seem to be more applicable.</p>	<p>(1) ensure that <i>metering data services</i> are provided in accordance with the <i>Rules</i>, the <i>metrology procedure</i> and procedures authorised under the <i>Rules</i>;</p>
7.2.1A (b)(2)(A)	<p>(2) through the establishment of additional processes if necessary: (A) permit <i>Metering Data Providers</i> to</p>	<p>It is unclear what this clause is adding? The provision of metering data services is the fundamental role of a MDP and</p>	<p>Delete the clause as is unnecessary</p>

Clause	AMO Proposed Wording	SP AusNet Issues	SP AusNet Suggested Wording
	provide <i>metering data services</i> between the <i>metering installation</i> and the <i>metering database</i> ;	having accepted the role they must under the Rules and their accreditation carry out the services.	
7.2.1A (b)(2)	(2) through the establishment of additional processes if necessary:	AEMO has the broad obligation to have processes in place to meet its market requirements hence it would appear to be unnecessary to remind them of this obligation here. Further if the suggested SP AusNet changes to the paragraphs (A) to (E) are accepted this “lead-in” is unnecessary	Delete the “lead-in” as is unnecessary
7.2.1A (b)(2)(B)	(B) permit the <i>financially responsible Market Participant</i> to select the <i>Metering Data Provider</i> of its choice to perform the <i>metering data services</i> in accordance with this clause, except where special site or technology conditions are to be accommodated as provided for in paragraph (d);	This clause which requires AEMO to “permit” a FRMP to choose the MDP through a “additional process” is inconsistent with the manner in which obligations are put on market parties. Rather the Rules should place an obligation on the FRMP in the circumstances as defined in 7.2.1A. To do this a clause similar to 7.2.2(c) of the AEMC’s Draft Decision. Refer also SP AusNet comments on 7.2.1A (d). The wording proposed by SP AusNet for 7.2.1A (d) eliminates the need for the special site condition here. Further under SP AusNet’s understanding of the requirements as we have stated in our comments on 7.2.1A	Add Clause below as 7.2.1B or as 7.2.2 (c) <i>A Market Participant</i> is responsible for engaging a <i>Metering Data Provider</i> in relation to each <i>metering installation</i> for which it is the <i>financially responsible Market Participant</i> and for which the <i>responsible person</i> is the <i>Transmission Network Service Provider</i> .

Clause	AMO Proposed Wording	SP AusNet Issues	SP AusNet Suggested Wording
		(d), AEMO would <u>only</u> step in where the FRMP failed to select a MDP which met AEMO's requirements (not for all special sites), and hence the proposed wording is incorrect under this understanding	
7.2.1A (b)(2)(C)	(C) select the <i>Metering Data Provider</i> where: (i) special site or technology related conditions exist, as determined by <i>AEMO</i> in accordance with paragraph (d); or (ii) the <i>financially responsible Market Participant</i> fails to select the <i>Metering Data Provider</i> in accordance with subparagraph (2)(B),	Whether there are special site or technology related conditions or not, SP AusNet understand, as set out in the table above, that the AEMC consider that AEMO should have step in powers for MDP selection for a site where the RP is the TNSP. Further the wording proposed by SP AusNet for 7.2.1A (d) eliminates the need for the special site condition here. Under SP AusNet's understanding of the requirements as we have stated in our comments on 7.2.1A (d), AEMO would <u>only</u> step in where the FRMP failed to select a MDP which met AEMO's requirements (not for all special sites), and hence the proposed wording is incorrect under this understanding	(C) select the <i>Metering Data Provider</i> where the <i>financially responsible Market Participant</i> fails to select the <i>Metering Data Provider</i> in accordance with subparagraph (2)(B) or under the suggested SP AusNet drafting 7.2.1B or 7.2.2 (c). In the table above SP AusNet has pointed out that there are no provisions in 7.2.1(a)(2) for AEMO to appoint an MDP where the RP has failed to do so. This is not to suggest that the "step in" power in (C) as drafted above is not required for these market critical transmission sites. We also note that where the FRMP does NOT select the TNSP as the RP, AEMO does not have defined step in power accept if the site is "special" under the SP AusNet redrafted 7.2.5 (i).

Clause	AMO Proposed Wording	SP AusNet Issues	SP AusNet Suggested Wording
7.2.1A (b)(2)(D)	(D) require the <i>Metering Data Provider</i> chosen by the <i>financially responsible Market Participant</i> in subparagraph (2)(B) to provide <i>metering data services</i> to that participant;	It is unclear what this clause is adding? The provision of metering data services is the fundamental role of a MDP and having accepted the role they must under the Rules and their accreditation carry out the services.	Delete the clause as is unnecessary
7.2.1A (b)(2)(E)	(E) require the <i>Metering Data Provider</i> chosen by <i>AEMO</i> in subparagraph (2)(C) to provide <i>metering data services</i> to <i>AEMO</i> and to accommodate the special site or technology related conditions when providing those services;	It is unclear what this clause is adding? The provision of metering data services is the fundamental role of a MDP and having accepted the role they must under the Rules and their accreditation carry out the services. However if there is perceived to be a requirement to impose specific obligations on the MDP because this scenario is a “special case” of <i>AEMO</i> whilst not the RP requiring services to be provided by the MDP under a contract to another party (the <i>FRMP</i>) then it would be more appropriate to put a clause with this clear intent in 7.4.2A which defines	Delete the clause as is unnecessary (or add a clause to the MDP obligation section of the Rules)
7.2.1A (b)(2)(3)	(3) incorporate in the <i>service level procedures</i> any additional processes established by <i>AEMO</i> for the purpose of fulfilling its obligations under subparagraph (b)(2).	<i>AEMO</i> has the broad obligation to have SL Procedures for all service provider requirements and hence it would appear to be unnecessary to remind them of this obligation here.	Delete the clause as is unnecessary
7.2.1A (c)	(c) For the purpose of subparagraph (b)(2)(B), <i>AEMO</i> is to be regarded as the <i>financially responsible Market Participant</i> for	This clause would seem not to be required as the role of RP for connectors is clearly allocated to <i>AEMO</i> under	Delete the clause as is unnecessary

Clause	AMO Proposed Wording	SP AusNet Issues	SP AusNet Suggested Wording
	<i>interconnectors.</i>	7.2.1(c)	
7.2.1A (d)	<p>If <i>AEMO</i> determines that a <i>metering installation</i> is affected by special site or technology related conditions and that these conditions need to be accommodated by the <i>financially responsible Market Participant</i> when choosing a <i>Metering Data Provider</i>, <i>AEMO</i> must:</p> <p>(1) specify and <i>publish</i> those special site and technology related conditions, including the date by which those conditions need to be accommodated;</p> <p>(2) be reasonably available to clarify any matters with the <i>financially responsible Market Participant</i>, at the request of that person, in order for that person to choose a <i>Metering Data Provider</i> for that <i>metering installation</i> that is mutually suitable to that person and <i>AEMO</i>.</p>	<p>1 It is SP AusNet’s understanding that the requirement is for <i>AEMO</i> to have the ability to:</p> <p>(i) Determine that a metering installation has special site or technology related conditions (special sites)</p> <p>(ii) Determine suitable MDP(s) for a site which has these special site or technology related conditions</p> <p>(iii) Require the party responsible for the selection of the MDP to restrict their choice of MDP to these suitable MDP(s).</p> <p>This would include:</p> <ul style="list-style-type: none"> • the RP making their choice under clause 7.2.1 (2) or • the FRMP making their choice under what is currently in the AEMC drafting 7.2.1A(b)(2)(B), or under the suggested SP AusNet drafting 7.2.1B or 7.2.2 (c). <p>(iv) Step in and select the MDP if the party responsible for the selection does not choose one of these suitable MDP(s). In the case of a RP chosen MDP being “vetoed” by <i>AEMO</i> this does not relieve the RP of responsibility.</p> <p>This enables <i>AEMO</i> to be comfortable</p>	<p><u>For an installation where the Transmission Network Service Provider is the irresponsible person</u>, if <i>AEMO</i> determines that a <i>metering installation</i> is affected by special site or technology related conditions and that these conditions need to be accommodated by the <i>financially responsible Market Participant</i> when choosing a <i>Metering Data Provider</i>, <i>AEMO</i> must:</p> <p>(1) specify and <i>publish</i> those special site and technology related conditions, including the date by which those conditions need to be accommodated;</p> <p>(2) be reasonably available to clarify any matters with the <i>financially responsible Market Participant</i>, at the request of that person, in order <u>for that person to choose</u> to ensure a <i>Metering Data Provider</i> for that <i>metering installation</i> that is mutually suitable to that person and <i>AEMO</i></p> <p>(3) select the <i>Metering Data Provider</i> if <u>the financially responsible Market Participant fails to select a Metering Data Provider who meets AEMO’s requirements.</u></p>

Clause	AMO Proposed Wording	SP AusNet Issues	SP AusNet Suggested Wording
		<p>that the MDP has the appropriate level of technical skills and background to provide the necessary complicated services.</p> <p>This is the basis of the details set out in the table above., and SP AusNet consider that this is an appropriate response to ensure metrology rigour.</p> <p>However , the wording of 7.2.1A (d) and 7.2.5 (i) does not make this requirement clear.</p> <p>2 in (2) the phrases “at the request of that person” , and “for that person” would appear to be superfluous</p> <p>3 it is not clear from the layout and numbering of 7.2.1A that this clause 7.2.1A (d) (and 7.2.1A (e) and (f)) are not applicable to the general case of the RP selecting the MDP, but rather only applicable to the situation of the TNSP being the RP with the FRMP having the role of choosing the MDP.</p>	
7.2.1A (e)	(e) If a special site or technology related condition identified by <i>AEMO</i> under subparagraph (d)(1) impacts on two or more <i>financially responsible Market Participants</i> then those <i>Market Participants</i> must agree and notify <i>AEMO</i> of the <i>Metering Data Provider</i> that will provide the <i>metering data</i>	It is SP AusNet’s understanding that this clause is only required to support sites where TNSP has been allocated the role of RP, and for which subsequently under 7.2.1A(b)(2)(B), (or under the suggested SP AusNet drafting 7.2.1B or 7.2.2(c)), the FRMP has been given the role of selecting the MDP. If there are in fact	(e) For an installation where the <i>Transmission Network Service Provider</i> is the <i>responsible person</i> and in accordance with 7.2.1A(b)(2)(B), (or under the suggested SP AusNet drafting 7.2.1B or 7.2.2(c)) the <i>financially responsible Market Participants</i> must select the MDP for a site where there are

Clause	AMO Proposed Wording	SP AusNet Issues	SP AusNet Suggested Wording
	<p><i>services</i> for the relevant <i>metering installation(s)</i>, sufficient to accommodate the special site and technology condition by the date specified in subparagraph (d)(1).</p>	<p>two or more FRMPs associated with such a site where the TNSP is the RP then this clause gives AEMO the right to choose the MDP.</p> <p>For sites where the TNSP is NOT the RP (ie the FRMPs have chosen not to appoint the TNSP), but cannot decide which FRMP should be the RP, then AEMO has step in power under existing “Joint metering installations” clause 7.2.4 (b) and (c). Once AEMO in this circumstance has selected which FRMP is to be the RP, then that FRMP has the sole choice of MP under 7.2.1 (a) (1) and MDP under 7.2.1 (a) (2).</p> <p>Note this is a joint metering installation (singular) not metering installations.</p>	<p>two or more <i>financially responsible Market Participants</i> impacted, then those <i>Market Participants</i> must agree and notify <i>AEMO</i> of the <i>Metering Data Provider</i> that will provide the <i>metering data services</i> for the relevant <i>metering installation</i>..</p>
7.2.1A (f)	<p>(f) In the absence of such an agreement specified in paragraph (e), <i>AEMO</i> may nominate a <i>Metering Data Provider</i> to provide the <i>metering data services</i> for those <i>metering installations</i>.</p>	<p>Note this is a joint metering installation (singular) not metering installations.</p>	<p>(f) In the absence of such an agreement specified in paragraph (f), <i>AEMO</i> may nominate a <i>Metering Data Provider</i> to provide the <i>metering data services</i> for those <i>metering installations</i>.</p>
7.2.5 (g)(1)	<p>(1) engage a <i>Metering Data Provider</i> (unless that person is a <i>Metering Data Provider</i>) to provide <i>metering data services</i> between the <i>metering installation</i> and the <i>metering database</i>;</p>	<p>Consistent with the SP AusNet views on clauses 7.2.1 (a) (2), 7.2.1A(b)(1) etc <i>metering data services</i> extend beyond the provision of data to the <i>metering database</i></p>	<p>(1) engage a <i>Metering Data Provider</i> (unless that person is a <i>Metering Data Provider</i>) to provide <i>metering data services</i>;</p>

Clause	AMO Proposed Wording	SP AusNet Issues	SP AusNet Suggested Wording
7.2.5 (h)	(h) <i>A responsible person</i> , prior to engaging a <i>Metering Data Provider</i> under subparagraph (g)(1), must liaise with <i>AEMO</i> to determine if there are any special site or technology related conditions to be accommodated when choosing the <i>Metering Data Provider</i> for a <i>metering installation</i> .	<p>Whilst it is agreed that the Participant must take actions to validate whether a site which they are contemplating becoming the RP for is a special site or has technology related conditions, this specific requirement to liaise with (ie in any literal sense “make contact with”) <i>AEMO</i> is a very arduous requirement.</p> <p>If as recommended in our broad comments the definition of special site or has technology related conditions is made clearly defined then given the very small number of such sites (a few thousand in the market?) the likelihood of one being overlooked by a potential RP are very small.</p>	<p>Revise as follows:</p> <p>h) <i>A responsible person</i>, prior to engaging a <i>Metering Data Provider</i> under subparagraph (g)(1), must take reasonable endeavours to determine if there are any special site or technology related conditions to be accommodated when choosing the <i>Metering Data Provider</i> for a <i>metering installation</i>.</p>
7.2.5 (i)	<p>(i) If <i>AEMO</i> determines that a <i>metering installation</i> is affected by special site or technology related conditions and that these conditions need to be accommodated by the <i>responsible person</i> when choosing a <i>Metering Data Provider</i>, <i>AEMO</i> must:</p> <p>(1) specify and <i>publish</i> those special site and technology related conditions, including the date by which those conditions need to be accommodated;</p> <p>(2) be reasonably available to clarify any matters with the <i>responsible person</i>, at the</p>	<p>As stated under SP AusNet comments on clause 7.2.1A(d)</p> <p>It is SP AusNet’s understanding that the requirement is for <i>AEMO</i> to have the ability to:</p> <p>(i) Determine that a metering installation has special site or technology related conditions (special sites)</p> <p>(ii) Determine suitable MDP(s) for a site which has these special site or technology related conditions</p> <p>(iii) Require the party responsible for the selection of the MDP to restrict their</p>	<p>If <i>AEMO</i> determines that a <i>metering installation</i> is affected by special site or technology related conditions and that these conditions need to be accommodated by the <i>responsible person</i> when choosing a <i>Metering Data Provider</i>, <i>AEMO</i> must:</p> <p>(1) specify and <i>publish</i> those special site and technology related conditions, including the date by which those conditions need to be accommodated;</p> <p>(2) be reasonably available to clarify any</p>

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	<p>request of that person, in order for that person to choose a <i>Metering Data Provider</i> for that <i>metering installation</i> that is mutually suitable to that person and <i>AEMO</i>.</p>	<p>choice of MDP to these suitable MDP(s). This would include:</p> <ul style="list-style-type: none"> • the RP making their choice under clause 7.2.1 (2) or • the FRMP making their choice under what is currently in the AEMC drafting 7.2.1A(b)(2)(B), or under the suggested SP AusNet drafting 7.2.1B or 7.2.2 (c). <p>(iv) Step in and select the MDP if the party responsible for the selection does not choose one of these suitable MDP(s). In the case of a RP chosen MDP being “vetoed” by AEMO this does not relieve the RP of responsibility.</p> <p>This enables AEMO to be comfortable that the MDP has the appropriate level of technical skills and background to provide the necessary complicated services.</p> <p>This is the basis of the details set out in the table above., and SP AusNet consider that this is an appropriate response to ensure metrology rigour.</p> <p>However , the wording of 7.2.1A (d) and 7.2.5 (i) does not make this requirement clear.</p> <p>2 in (2) the phrases “at the request</p>	<p>matters with the <i>responsible person</i>,at the request of that person, in order <u>for that person to choose</u> to ensure a <i>Metering Data Provider</i> for that <i>metering installation</i> that is mutually suitable to that person and <i>AEMO</i></p> <p><u>(3) select the <i>Metering Data Provider</i> if the <i>responsible person</i> fails to select a <i>Metering Data Provider</i> who meets AEMO’s requirements.</u></p>

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		of that person” , and “for that person” would appear to be superfluous	
7.2.5 (j) & (k)	<p>(j) If a special site or technology related condition identified by <i>AEMO</i> in the document <i>published</i> in accordance with subparagraph (i)(1) impacts on two or more <i>responsible persons</i> then those <i>responsible persons</i> must agree and notify <i>AEMO</i> of the sole <i>responsible person</i> for the relevant <i>metering installation(s)</i> who is able to accommodate the special site and technology related condition by the date specified in subparagraph (i)(1).</p> <p>(k) In the absence of such an agreement specified in paragraph (j), <i>AEMO</i> may nominate one of the <i>responsible persons</i> to be the sole <i>responsible person</i> for those <i>metering installations</i>.</p>	<p>These clauses appear to add nothing to the current clauses under 7.2.4 which provide arrangements for Joint metering installations.</p> <p>Whether the site is “normal” or is special site or has technology related conditions, the requirement is to ensure the FRMPs choose which is going to be RP. This is managed by 7.2.4. Once the single RP is in place (whether by the FRMPs agreement or AEMO nomination), the clauses under 7.2.5(i) provide the basis of MDP selection by the RP.</p>	Remove clauses