

SP AusNet Submission on Draft Rules Determination National Electricity Amendment (Provision of Metering Data Services and Clarification of Existing Metrology Requirements) Rule 2009

Ref O:\Electricity Documents\Metrology Harmonisation\SP Rule Change 09_10\EAMO Chapt 7 Rule change re SPs - Draft Determination - SPAN submission v4.doc

SP AusNet submits these comments to the AEMC in response to the AEMC Draft Determination on the AEMO proposed National Electricity Amendment (Provision of Metering Data Services and Clarification of Existing Metrology Requirements) Rule 2009. The submission consists of two parts:

- general comments regarding the proposed changes, and
- comments arising from our consideration of specific proposed Rule provisions.

A General Comments

1 Responsibility for meter data services

The drafting of the proposed Rule change by AEMO involved extensive industry consultation through the Metrology Reference Group (MRG). A key aspect of this consultation was the issue of responsibility for meter data services for large customer metering.

There was significant debate regarding whether the responsibility which currently rests, at least notionally, with AEMO should be given to the FRMP who currently chooses the meter data service provider, or whether a data process end-to-end responsibility should be established.

It was agreed in the MRG that the current Rules regarding responsibility and selection of service provider were established early in the market based on an assessment of how the metrology service arrangements would develop. The mature market that we currently have has not developed in a way consistent with these early assumptions. The contestable service provider market has strongly developed. Features of this development are:

- strong contestable service market with a number of viable providers;
- very strong link between meter provision and data service provision as a coupled service in most cases;
- in many cases, probably unexpectedly, left the DNSP as not the meter service provider of choice on their network with FRMP largely determining to be the Responsible Person AND selecting the data service provider;
- the obligation of the DNSP to provide “default” meter provider services is rarely utilised.

The MRG agreed that the choice of Responsible Person model had to take these features into account.

The further debate in the MRG was with respect to what impact the nationally focussed move to Smart meters would have on this model. Although AEMO took the view (despite some resistance from within the MRG) that this Rules change should exclude changes required for Smart meters, it was seen that the Rules change should at least recognise potential Smart meter impacts and not make the path to further changes for Smart meters more difficult. It was recognised that a key change with respect to Smart meters was the move away from the public telecommunications network as the communication medium for remote meter reading.

To date remote reading has been carried out using networks regulated under communication industry standards, with largely standardised hardware (modem) interfaces, and for which service levels were largely “fixed” in any given location. For Smart meters a range of communications solutions are in place or envisaged. These are not regulated with respect to performance, have interfacing arrangements which are more integrated into the meter and for which hardware

interfacing is less than clear, and where performance levels are under the control (within the chosen communication medium's constraints) of the supplier/operator.

When all these factors were taken into account the MRG agreed with AEMO that the logical choice was for the Responsible Person role to be extended into the provision of metering data services. This was consistent with the approach almost exclusively in place now for large customers where the FRMP chooses to be Responsible Person and chooses a linked meter provider and meter data services provider, and also provides support for having a single party with overall responsibility for the meter to telecommunications network interface which will become less and less reliant on "standard" public telecommunication interface in the future.

SP AusNet therefore considers that the AEMC's decision to choose the alternate model of having two parties with split responsibilities for the end to end data process is not in the ultimate best interests of market metrology.

The AEMC's Determination suggests a number of reasons for this choice. SP AusNet considers that these reasons are not substantiated as follows:

- i. Overcomes issues for TNSPs with respect to the need for taking on the Responsible Person role for meter data services for transmission and interconnector NMI's.

SP AusNet do not consider that this role is arduous as the telecommunications interface for these limited "high level" NMI's are likely to remain the standard public telecommunications network and that the AEMO accreditation and audit process ensures data service providers have the necessary capabilities. Developing suitable contractual relationships does not appear to be arduous and has been done successfully by FRMP's in the past.

However, if this is still deemed to be too much of an impost on TNSPs then the alternative of AEMO choosing the data service provider and continuing to be responsible for the remote acquisition and data handling for these large and market significant NMI's is also appropriate. This is consistent with the AEMO requirement under their proposed clause 7.2.5 (ab) for them to have right of choice of data service providers for these NMI's¹.

- ii. Confers a new regulatory obligation on DNSPs to have access to meter data services as a default provider

No DNSP raised this as an issue. SP AusNet consider that the reason for the lack of concern from DNSPs is due to a combination of factors including:

- The FRMP's right to select the DNSP to be the Responsible Person is almost never taken up.
- Meter provider and data service provider are generally linked and any offer by DNSPs to provide Responsible Person role would be based on a linked service.
- As the service provider market is strong then a DNSP without an in-house meter data service provider could easily arrange the necessary contractual arrangements if they already do not have one in place

On further consideration of this point since our initial submission, SP AusNet are now of the view that the current market obligation which obliges the DNSP to make an offer for Responsible Person (and meter provision) when requested is no longer a market requirement based on the establishment of a strong contestable market for service provision. SP AusNet consider that the Rules could now be changed such that the DNSP "may" submit an offer for Responsible Person service but is not obliged to. This would be consistent with the approach for meter data services as proposed in the AEMC model.

¹ SP AusNet consider that the establishment of a Category T Meter Data Service Provider accreditation will provide AEMO with the necessary control over the selection of suitable service providers for these sites. Refer SP AusNet further comments on Rules Schedule 7.6.

iii. Allow FRMP (Retailer) choice of meter data provider

As stated above the FRMP currently largely selects their service providers as a pair for meter provision and data services, and the end to end Responsible Person concept continues to allow them to do that.

Further the AEMC drafted approach has a number of issues of drafting and implementation.

- i. Currently there is no allocated role in the market for “the Market Participant responsible for engaging a MDP and for providing meter data services”. As this role could be taken up by the FRMP or the LNSP a new field will need to be added to MSATS and to the associated B2B processes and transactions. This is a relatively large change to AEMO and Participants’ market systems.
- ii. The concept of Responsible Person as it applies to the meter provision role is that each relevant participant appoints a person who is the Responsible Person; there is no absolute reason why the *Market Participant responsible for engaging a MDP and for providing meter data services* needs to be “a person”, however for consistency of approach and terminology it would appear to be appropriate to reference the role/person. Logically there would be two Responsible Persons; the Meter Responsible Person and the Data Responsible Person (or similar descriptor terms).
- iii. A number of the processes required for handling data and meter issues are somewhat simplified if there is only a single Responsible Person. The AEMC drafting in a number of clauses “trips over” the convoluted path which is required to deal with data issues in various circumstances. These require decision paths in which for example the MDP notifies the “party responsible for data services”; who notifies/requests the Responsible Person; who notifies/requests the MP. A single Responsible Person significantly simplifies this approach and allows an approach which leads to more direct MDP to MP communications.

2 Smart Meter Issues

SP AusNet’s initial submission suggested that this Rules change should be delayed until the service model for Smart meters was clearer. SP AusNet still consider that this would be appropriate. Although the National Smart Meter Program development of the metrology and service model has been delayed from that envisaged when these SP AusNet comments were made, it is still envisaged that potentially the incorporation of Smart meter aspects in Chapter 7 could produce a number of further changes, and potentially “unwind” some of the AEMC recommended drafting. As noted in 1 above the choice of the responsible person model has a number of inter-relationships with the incorporation of a Smart meter model in the Rules.

Further we have made comment in our detailed input on a number of aspects of the drafting which is not only potentially incompatible with the future Smart meter metrology and service model, but is actually in conflict with the metrology arrangements established for the Smart meter (AMI) rollout in Victoria. The drafting appears to not recognize that over the next couple of years about a quarter of the meters in the market will be remotely read type 5 meters. A number of Rules regarding remote read meter metrology are still focussed on a low volume of large customer remote read situations and not on the mass reading of small customer meters as will be in place in Victoria. We have made specific comments against those clauses which are problematic with respect to either the likely national Smart meter model and/or the current AMI model in Victoria.

Of particular concern would be any move to impose tighter requirement on manual data collection from meters with remote data acquisition which would apply to the Victorian tyre 5 AMI meters. We have made further comment regarding this matter in our detailed comments against clause 7.2.2 (d) (2).

We have however generally restricted these comments to those clauses which have been impacted by the current AEMO drafting and the AEMC responses and further drafting, and for which further changes may be required for support of smart meters in the relatively near future. We have not made further comments with respect to the other clauses which we identified in our initial submission which will need consideration as part of the detailed drafting for Smart meters. For example 7.2.5 (d) (9) regarding meter removal which would be very problematic when distributor Smart meters are an integrated component of that distributor's network and supply management.

3 Metrology regulatory instrument regime issues

SP AusNet's initial submission suggested that this Rules change should not reinforce the issues with the current metrology regulatory instrument regime, and suggested that the effort should be made now to remove the fundamental obligations from the Service Level Requirements (SLRs) (and the accreditation process documentation) and move these to the Metrology Procedure, leaving the SLRs as lower level documents providing service provider level detail of what the expectations were as to how the Rules and Metrology Procedure obligation should be fulfilled.

SP AusNet is pleased that the AEMC has recognised that the current metrology regulatory instrument regime provides less than suitable support for this fundamental market requirement and has directed AEMO to review and harmonise these documents.

However the need for such a review has been a prime strategic position of the industry members on the MRG for some years, but has not gained the broad acceptance of AEMO for resources to be allocated. SP AusNet hence recommends that the AEMC provide in their final determination a date by which this rationalisation must occur. In our initial submission SP AusNet opposed the SLRs being made Procedures because we considered that they were at a lower level in the metrology document hierarchy. On further consideration of this point since our initial submission, SP AusNet is now of the view that the AEMC decision to make the SLRs into a Service Level Procedure (SL Procedure) is appropriate as it ensures broader industry visibility of the content of the SL Procedure and will reinforce the need for all changes to be scrutinised against the principles of what the SL Procedure should contain relative to the Metrology Procedure.

SP AusNet consider that the date in clause 7.14.1A (b) for the publishing of the first SL Procedure should be set at a point in time which allows for at least some fundamental consideration of the principles with respect to relative content of the Metrology Procedure and the SL Procedure, with the view to ensuring that consideration is given to these principles in the initial drafting of the SL Procedure.

SP AusNet would like to see the extent of the review directed by AEMC to clearly include not only the Metrology Procedure and the SL Procedure but also the large suite of other procedures and guidelines which has "grown" in the metrology space. There are now over 30 documents as part of the metrology regulatory instrument regime. This is a significant regulatory burden on the industry (and AEMO), and subject of a number of industry identified instances of duplication and overlap, and inconsistency. The review should include the rationalisation of these documents to a number which are more manageable and subject to an agreed structure which defines clearly the hierarchy.

Part of this review of the document structure would be a re-statement of the aim and intention of "guidelines". Initially these were conceived as an aid to parties involved in a role or process and hence were not obligatory, but rather advisory. However recently guidelines have been developed or revised to include mandatory requirements expected by AEMO which are not clearly defined as obligations in higher level documents. For example, SP AusNet would consider that a number of the matters outlined in 7.4.2 (bc) and 7.4.2A (f), and to be detailed in guidelines, are substantive resource and cost items for service providers. To mandate these in guidelines would appear to be extending the scope of guidelines beyond their original intention.

SP AusNet is also pleased that the AEMC in clause 7.1.3 (a) and (b) has provided that "procedures (including documents such as guidelines) ... must be established and maintained by AEMO in accordance with the *Rules consultation procedures*". We presume that this means all "guidelines" relevant to Chapter 7 matters not just those specifically identified in the Rules. This should be

made clearer in the Rules. This will ensure that once the current metrology regulatory instrument regime is rationalised and in place, that “ad hoc” guidelines are not developed which seek to clarify the procedures but rather risk conflict and confusion.

4 Metering Register issues

SP AusNet supports the concept of clearly identifying two metering data databases; the *metering data services database* which is the role of the data service provider to establish and maintain, and the *metering database* which is an AEMO role. This removes the concept of the *metering database* being a “distributed” database as was required by the previous model. However the AEMC response to comments on clause 7.5.1 and the AEMC drafting of a number of clauses appear to overlook the fact that the *metering register* must remain a distributed database with different aspects held by AEMO, the metering provider, and the data services provider.

SP AusNet has attempted to identify the clauses in which these issues arise.

B SP AusNet Comments on Specific Clauses

The following table provides detailed comments on specific provisions and offers suggested amendments:

	Clause	Issue	Rating	Recommendation
1.	7.1.1 (b) (8)	As noted in Item 4 in General Comments above, the metering register remains as a distributed database under the model proposed in the amendment. All the detailed required in Schedule 7.5 will NOT be contained in any one database.	H	Remove the metering database from (b)(8) and include as a separate item in a new (b)(9).
2.	7.1.3 (a) and (b)	<p>SP AusNet is pleased that AEMC in clause 7.1.3 (a) and (b) have provided that “procedures (including documents such as guidelines)””must be established and maintained by AEMO in accordance with the <i>Rules consultation procedures</i>”.</p> <p>We presume that this means all “guidelines” “relevant to Chapter 7 matters”, not just those specifically identified in the Rules. This should be made clearer. This will ensure that once the current metrology regulatory instrument regime is rationalised and in place, that “ad hoc” guidelines are not developed which seek to clarify the procedures but rather risk conflict and confusion.</p>	H	Clarify wording such as to ensure these clauses apply to all “guidelines” “relevant to Chapter 7 matters”, not just those specifically identified in the Rules.
3.	7.1.3 (e)	<p>The term “procedures” is defined in 7.1.3 (a) “including documents such as guidelines”. The obligation in (e) presumably therefore covers all these documents however this should be made clearer.</p> <p>Further the obligation should not only to publish the list but also to publish the documents.</p>	H	Include wording that specifies that the required list is of all Rules Chapter 7 related documents and AEMO must publish all the documents not just a list.
4.	7.2.2	SP AusNet has made a number of comments in the General Comments section of this submission regarding issues with the AEMC drafted approach of splitting the responsibility role for the end to end data process.	H	Refer comments in General Comments section

	Clause	Issue	Rating	Recommendation
5.	7.2.2 (c)	<p>In the AEMO drafting it was made clear that AEMO required to be able to overwrite the choice of data service provider by a Participant for <i>transmission network connection points</i> and for <i>interconnectors</i> .</p> <p>Refer AEMO draft clause 7.2.5 (ab)</p> <p><i>NEMMCO</i> may nominate the <i>Metering Data Provider</i> to be engaged under paragraph (aa) by the <i>responsible person</i> for <i>transmission network connection points</i> and for <i>interconnectors</i> and the <i>responsible person</i> must comply with such nomination.</p> <p>We assume that AEMC have sought to remove this requirement by inserting in Schedule 7.6 S7.6.2 the concept of a Category 1T, 2T, 3T and 4T Metering Data Provider (MDP).</p> <p>We consider that this will not serve to remove the need for AEMO to have the right of veto of the choice of MDP. For example AEMO may consider that, for a number of installations with key interdependencies in the data, a single MDP be appointed, or may prefer to maintain continuity of service of an MDP rather than lose valuable background details on the basis of the establishment of complicated logical metering algorithms.</p>	H	<p>As stated in General Comments section of this submission, SP AusNet consider that the responsibility and role of selecting the MDP for <i>transmission network connection points</i> and for <i>interconnectors</i> should remain with AEMO. This removes the need for the Participant responsible for the data to be forced to contract with a party not of their choosing, and provides AEMO with their stated requirement of nominating the MDP.</p> <p>AEMC should reconsider the inclusion of Category T MDP which appears to just complicate an already complicated accreditation regime, and reinstate a clause similar to that provided by AEMO.</p>
6.	7.2.2 (c)	<p>If the concept of a “Data Responsible Person” with the LNSP potentially being appointed to the role is retained by AEMC then, a subclause re termination of an agreement similar to 7.2.2 (b)(2) must be included here.</p> <p>Further we cannot understand why the current wording of 7.2.2 (a) and (b) could not have been adopted with some</p>	M	<p>Include clauses based on 7.2.2 (a) and (b) as suggested.</p> <p>(c) <i>A Market Participant</i> may elect to be responsible for the provision of metering data services for a <i>metering installation</i> that is a type 1, 2, 3 or 4 <i>metering installation</i>.</p>

	Clause	Issue	Rating	Recommendation
		modifications for the equivalent MDP role rather than write the clause in a different manner		(c1) A <i>Market Participant</i> is responsible for the provision of metering data services for a type 1, 2, 3 or 4 <i>metering installation</i> if: (1) the <i>Market Participant</i> elects not to request an offer from, or does not accept the offer for taking on responsible for the provision of metering data services, from the <i>Local Network Service Provider</i> ; or (2) an agreement under para (1) above is terminated due to a breach by the <i>Market Participant</i> .
7.	7.2.2 (d)	The market participant will NOT be responsible presumably for the obligation in 7.2.2 (d) (1) and (2) if they accept an offer from the LNSP to be responsible for the provision of metering data services. The LNSP would then have these responsibilities.	H	Change wording. If the concept of a split responsibility is to be retained then drafting would be simplified if the concept of the Meter Responsible Person and Data Responsible Person as suggested by SP AusNet (as a fallback from our broader view of one Responsible Person) was adopted.
8.	7.2.2 (d) (2)	Whereas the Rules in 7.3.7 provide clear basis for the parties involved (and for the Metrology Procedure details) with respect to timeframes for action on a meter installation failure, this clause re the party responsible for the provision of metering data services provides no such basis for the timeframes for reacting to the markedly different issue of a remote acquisition failure. This aspect is markedly different because a meter malfunction will often result in data not being recorded, whereas in the case of a remote acquisition failure, data is still being stored in the meter, but not collected. A clause is required with respect to timeframes for action associated with a remote acquisition failure. This clause needs to recognise the place of substitutions in the metrology	H	SP AusNet have not given detailed consideration to the type of timeframes which might be applied to manual data recovery. The ultimate backstop obligation could be that actual metering data must not be lost and the meter must be manually read before unread data fills the meter data storage memory. In the case of Victorian AMI meters this period would be 220 days as they must be compliant with type 5 metrology requirements. However even this obligation would be tighter than the current obligations regarding the small customers on manual reads where no access situations can persist for 12 months or more with loss of actual metering data, and where the

	Clause	Issue	Rating	Recommendation
		<p>process and not impose unnecessarily and economically inefficient timeframes on gaining manual read data.</p> <p>The impact on the market of a remote acquisition failure for a single customer is minimal because unless the remote acquisition failure continues for weeks the data will ultimately be recovered. The market impact (and billing impacts) are restricted to cost of the cash flow differences between the temporary substitutions and the actual data which will ultimately replace these substitutions. For small customers this impact is extremely small. There would be no economic efficiency case for committing the industry to a high level of manual reads for remote acquisition failure and the associated cost, based on this cash flow cost.</p> <p>These comments are also applicable to clause 7.11.3 (j) which defines the role of the MDP in the situation of loss of remote acquisition.</p>		<p>industry (distributors and retailers) are at times struggling to ensure in some cases one read a year from some recalcitrant customers with access issues.</p> <p>We would consider that the establishment of time frames are probably best left for the consideration by the national program looking at performance level and service levels for smart meters for small customers.</p>
9.	7.2.2 (d) (2)	Data provision is required to relevant participants as well as AEMO.	M	Add required wording
10.	7.2.2 (d) (2)	It is unclear why this clause suggests through the term “if any” that remote acquisition may not be involved. This clause only applied to type 4 which by definition have remote acquisition.	M	Remove “if any”
11.	7.2.2 (e) and 7.2.3 (l)	Whilst if the concept of the FRMP or the LNSP being responsible for meter data services is retained rather than a single Responsible Person, the need for a guideline for this role may be required - the obligation on AEMO should be to establish such a guideline for the party responsible for meter data services (or the Data Responsible Person) not for separate (and as drafted quite broad!) FRMP and LNSP	M	Revise wording as suggested.

	Clause	Issue	Rating	Recommendation
		guidelines.		
12.	7.2.3 (c)(2)	<p>SP AusNet made the following comments in its initial submission:</p> <p>Although SP AusNet understand the purpose of this Clause we have two fundamental issues with it:</p> <p>1 The intent is flawed. This is a contestable aspect of the market. These are not costs quoted to the financially responsible market participant (FRMP) on a regulated “fair and reasonable” basis but rather are given in a commercial context for the FRMP to consider against offers received from other service providers. It is not sound for the Rules to force this commercial relationship to be “open book”.</p> <p>2 The implementation would be difficult. The Local Network Service provider (LNSP) may organise their provision of metering services in many ways which would make the provision of the details very difficult. The service arrangement which the LNSP has may have a packaged cost rather than separate MP and MDP costs; it could have a number of service providers covering the various aspects of the MP role; it may be an average / generic price over a range of service providers; or a combination of some of these approaches.</p> <p>On further consideration the point can also be made as to whether an agreement under the Rules established on the basis of a specified service provider become void if for one reason or another the LNSP chooses, or is forced to change the service provider.</p>	H	<p>The AEMC’s basis for rejecting SP AusNet’s concerns is not clear. Is the AEMC suggesting that the LNSP cannot change service providers once an agreement is reached. If change is possible what is the driver for knowing at the point that agreement is reached?</p> <p>Revert the clause to the provision of terms and conditions only.</p> <p>Note as suggested in General Comments above, SP AusNet considers that the obligation for the LNSP to provide a default Responsible Person offer appears to be superfluous in the mature market. Hence similar to the AEMC proposed relationship for LNSP making offers for the role of the party responsible for data service, the offers for being responsible for meter data services could now be made at the LNSP’s discretion. This would make this relationship unregulated and the terms of the LNSP’s offer would be subject to commercial arrangements.</p>

	Clause	Issue	Rating	Recommendation
13.	7.2.3 (i)(2)	<p>SP AusNet made the following comments in its initial submission:</p> <p>This clause is not logically located. The “lead in” para for (i) restricts this Clause to where the FRMP accepts the LNSP’s service offer, however even if the FRMP rejects the offer the LNSP has an obligation to provide a NMI.</p>	M	<p>Although in SP AusNet’s initial submission it was suggested:</p> <p>Relocate the content of the Clause to 7.3.1 in the vicinity of Clauses (d) to (f) as these deal more generally with the NMI allocation obligation.</p> <p>The AEMC response suggested that we were proposing to remove the obligation. However our main point was even if the clause remains where it is the wording as currently drafted does not reflect the complete situation.</p> <p>It currently states:</p> <p>(i) If a <i>Market Participant</i> accepts the offer in accordance with paragraph (h), the <i>Local Network Service Provider</i>: (1) becomes the <i>responsible person</i>; and (2) must provide <i>AEMO</i> with the <i>NMI</i> for the <i>metering installation</i> within 10 <i>business days</i> of entry into a <i>connection agreement</i> under clause 5.3.7 with that <i>Market Participant</i>.</p> <p>It would only be correct if the following clause was added:</p> <p>(ia) If a <i>Market Participant</i> rejects the offer in accordance with paragraph (h), the <i>Local Network Service Provider</i> must provide <i>AEMO</i> with the <i>NMI</i> for the <i>metering installation</i> within 10 <i>business days</i> of entry into a <i>connection agreement</i> under clause 5.3.7 with that <i>Market Participant</i>.</p> <p>This is not good drafting and as suggested this clause re NMI</p>

	Clause	Issue	Rating	Recommendation
				allocation is better relocated.
14.	7.2.3 (i)(2)	NMI are not allocated to metering installations but rather to “connection points”	M	Revise wording
15.	7.2.3 (j)	The second part of this “new” AEMC drafted clause is inconsistent with the agreed approach (as reflected in 7.2.3 (k) that the Responsible Person or the person responsible for provision of meter data services does not “provide” those services but rather ensures their provision.	M	Revise wording “for the provision of” rather than “providing”
16.	7.2.3 (k)(3)	<p>Whereas this clause was presumably included to cover the requirements for type 5 meter installations which have remote acquisition for operational reasons under clause 7.3.4(f), it has now strayed into the coverage of Victorian smart meter provisions which are installed as type 5 but remotely read.</p> <p>There has been no detailed consideration of the situation regarding remote acquisition failure and the need for provision of actual data versus substituted data. The existing metrology in this area has been based around large customer installations and is not necessarily applicable to the small customer base covered by the Smart meter rollout.</p> <p>Whereas anticipated stringent data completeness measures will force broad high levels of performance, the requirement for actual data for individual mass market customers will not justify the large manual reader numbers required to fulfil this obligation for mass remote read meters. At this end of the market, estimation/substitution processes provide a satisfactory short term solution.</p>	H	Wording should be added to ensure that the metrology associated with remote acquisition failure clearly avoids imposing inappropriate data and timeframes obligations on Victorian distributors.

	Clause	Issue	Rating	Recommendation
17.	7.2.3 (k)(3)	Data provision is required to relevant participants as well as AEMO.	M	Add required wording
18.	7.3.1 (a) (1)	<p>SP AusNet made the following comments in its initial submission:</p> <p>It is unclear to what this Clause regarding display of cumulative total energy is referring in using the phrase “..or an equivalent accessible display...”</p> <p>To clarify the Rules and provide a sound basis for the consideration of necessary Smart meter changes to the Rules this phrase should be removed or additional wording added to make the intent clear.</p>	M	<p>SP AusNet suggested Provide clarity of requirements.</p> <p>AEMC stated that a “read out” is different to a display. However the national smart meter specification fails to recognise the distinction asking only for a display. What is a “read out” which makes is different to a “display”??</p>
19.	7.3.1 (a) (4)	As 7.2.5 (d) (4) does not require a communications interface except for remote acquisition it is unclear why this clause has been moved from (b) which includes requirement which may be included to (a) which are items which must be included	M	Return communication interface to (b)
20.	7.3.1 (a) (7)	<p>SP AusNet made the following comments in its initial submission:</p> <p>The Metering Installation should only be required to record import (generation) flows when these are authorised and legitimate flows. Where a customer has without notice installed generation plant eg pv cell, then the meter installed is unlikely to be able to record any flow from this unauthorised installation.</p>	M	<p>In SP AusNet’s initial submission it was suggested:</p> <p>Change wording to clarify the circumstances when generation flow would be recorded.</p> <p>AEMC in response appeared to agree that the decision to record generation should be determined by other than the Rules but did not agree to change the Rules to ensure that the Rules did not require the recording of generation in all circumstances.</p> <p>We cannot understand the inconsistency in the AEMC view.</p>

	Clause	Issue	Rating	Recommendation
21.	7.3.1 (a) (11)	<p>SP AusNet made the following comments in its initial submission:</p> <p>This clause states regarding data storage :</p> <p>“...include facilities for storing interval energy data for a period of at least 200 days or such other period as specified in the metrology procedure if the metering installation is registered as a type 5 metering installation”. It is unclear whether the Metrology Procedure can allow a lesser period of storage. If so then this should be made clearer.</p>	M	<p>In SP AusNet’s initial submission it was suggested:</p> <p>Wording should be “...of at least 200 days or such <u>lesser or greater</u> other period as specified in the metrology procedure.</p> <p>The AEMC response did not clarify whether a lesser period is satisfactory and hence SP AusNet has re-raised the issue.</p>
22.	7.3.1 (b)(4)	<p>SP AusNet made the following comments in its initial submission:</p> <p>This clause should be relocated to the mandatory requirements of a Metering Installation in SubClause (a). A meter cannot be installed other than on a suitable panel.</p>	M	<p>In SP AusNet initial submission we suggested: Relocate clause to (a) the mandatory section of clause 3.1.</p> <p>The AEMC response suggested that an appropriate panel did not impact metrology and that therefore the clause should be removed.</p> <p>SP AusNet is concerned that the AEMC consider that Chapter 7 should suggest having a suitable panel is not considered essential to maintaining an accurate metering installation over a longer period.</p> <p>SP AusNet would consider that to not include the panel in the definition of metering installation weakens the Rules support for the distributor (or other metering provider) to insist that such a panel is essential and require the customer to provide the location and space for such a panel.</p>
23.	7.3.1 (d)	<p>SP AusNet made the following comments in its initial submission:</p> <p>It is not the Responsible Person who applies to the LNSP for</p>	M	<p>In SP AusNet’s initial submission it suggested:</p> <p>Change the wording to reflect the actual process.</p>

	Clause	Issue	Rating	Recommendation
		the NMI; it is the FRMP. For the majority of sites the FRMP (retailer etc) will send a B2B Service Order for a new connection to the LNSP (or a NMI Creation Service Order in NSW) and the NMI will be created by the LNSP based on this transaction.		<p>The AEMC response suggested that the Responsible Person applies for the NMI. This obviously cannot be the case for type 5, 6, 7 NMIs where the LNSP is the Responsible Person but still generally requires an external request to create a NMI. For all NMIs this comes from the FRMP through the B2B process as suggested by SP AusNet.</p> <p>This is consistent also with the responsibilities established in the CATS Procedures.</p> <p>SP AusNet considers that its initial submission approach is correct.</p>
24.	7.3.1 (g) (1)	This Subclause must recognise that the Responsible Person may have obligations or restrictions eg Jurisdictional smart meter obligations, in addition to the Rules, which may require the Responsible Person to not agree to an additional feature.	H	<p>Add to (1)</p> <p>(1) that use must not cause an infringement of the requirements of the Rules or other obligation which the Responsible Person must fulfil with the Metering Installation.</p>
25.	7.3.7 (a) and (d)	<p>SP AusNet made the following comments in its initial submission:</p> <p>These Clauses together do not provide a good understanding of the obligations on the Responsible Person and service providers. The Responsible Person themselves is generally unlikely to “detect” a malfunction; it is the engaged service providers who will become aware of the malfunction, or a registered participant (retailer) who is impacted. Hence the “process” generally will be:</p> <ul style="list-style-type: none"> ○ MDP detects malfunction ○ MDP informs the MP and MP then fixes problem ○ if problem cannot be repaired in the required days Responsible Person is informed by MP and applies for exemption 	M	<p>In SP AusNet’s initial submission the following was suggested:</p> <p>Redraft Clauses based on the “process” and the obligations to support it.</p> <p>The AEMC response suggested that the process specified in the drafted clause IS the process generally followed and reinforced the Responsible Person role by requiring notice to the Responsible Person in one day.</p> <p>This Responsible Person “hands on” process as currently drafted is NOT the general approach used in the market and the Rules clauses should not force the Responsible Person into an active role which is inconsistent with the practical</p>

	Clause	Issue	Rating	Recommendation
		<p>The variation is the registered participant (retailer) informs the Responsible Person who initiates the repair with the MP.</p> <p>The obligations to support this process are not clear in these clauses. The obligations required are:</p> <ul style="list-style-type: none"> ○ MDP must detect malfunction and report malfunction to MP well inside timing period and Responsible Person must ensure this ○ MP must meet the timings in (a) (1) and (2) and Responsible Person must ensure this timing is met ○ MP must report when timing will not be achieved so that Responsible Person can request extension and Responsible Person must ensure this reporting is done <p>Note there is no specific requirement for the Responsible Person to be notified if the repair is made in the timing period.</p> <p>SP AusNet considers that this section covers situations where the meter has failed to record data; it does not cover the situation of remote acquisition failure for which obligations are defined in clause 7.2.2 (d). SP AusNet comments on remote acquisition failure are against that clause.</p>		<p>process which is handled between service providers without Responsible Person involvement in specific malfunctions.</p> <p>Writing the clause in the Rules will not force the process to match the AEMC's expectations; the process will achieve a practical achievable outcome which meets the metrology requirements <u>despite</u> the Rules.</p> <p>SP AusNet still considers that, consistent with other changes made by the AEMC in other Rules clauses, the service provider role should be one of "doing" and the Responsible Person role one of "ensuring".</p>
26.	7.4.2 (bb) and (bc)	<p>In our initial submission SP AusNet and other parties made a comment that the phrases "...any requirements established by AEMO .." in 7.4.1 (bb) and "...amongst other things..." in 7.4.1 (bc) left the Rules requirement too open ended.</p> <p>AEMC's response agreed with these comments and agreed that the list should "be no longer non exhaustive". The "any"</p>	H	<p>Make further wording change to align with the agreed concept of this being an exhaustive list.</p>

	Clause	Issue	Rating	Recommendation
		has been removed from the phrase in 7.4.1 (bb); however this change is of little impact as the phrase "...amongst other things..." remains in 7.4.1 (bc).		
27.	7.4.2 (bc)	<p>In its initial submission SP AusNet made a broad comment, and other parties made some specific comments, about this list and the obligations within the list.</p> <p>The overall issue is that a number of these obligations could impose significant risks and potentially costs on service providers, yet the Rules do little to define the scope of these obligations and hence do not provide a basis for restricting "scope creep" as we go forward.</p> <p>The requirements included are:</p> <ol style="list-style-type: none"> 1. cooperation with <i>AEMO</i> and any person engaged by <i>AEMO</i> to operate any relevant <i>agency metering database</i>, 2. the confidentiality of information collected by <i>Metering Providers</i>, 3. the resolution of disputes between <i>AEMO</i> and <i>Metering Providers</i>, 4. the access of <i>AEMO</i> to and the inspection and audit by <i>AEMO</i> of any equipment or database maintained by <i>Metering Providers</i>, 5. the insurance which must be taken out by or on behalf of <i>Metering Providers</i>, 6. subcontracting by <i>Metering Providers</i>, 7. the software and systems that are used by <i>Metering Providers</i>, 8. maintenance of quality systems accreditation, 9. the ownership of intellectual property that is developed or 	H	<p>These ten requirements must be defined in the Rules to the extent required to provide a clear basis for more detailed obligation definition in lower documents.</p> <p>SP AusNet would consider that this is the role of the Rules in the metrology document regime hierarchy. SP AusNet has identified below the type of specific obligation which should be defined in the Rules.</p> <p>Note it is appropriate that these obligations are numbered for ease of reference and consistency with the Rules drafting approach.</p> <p>The requirements included are:</p> <ol style="list-style-type: none"> 1. cooperation with <i>AEMO</i> and any person engaged by <i>AEMO</i> to operate any relevant <i>agency metering database</i>, 2. the confidentiality of information collected by <i>Metering Providers</i>, <p>Rewrite as: The MP must maintain the confidentiality of metering data</p>

	Clause	Issue	Rating	Recommendation
		<p>used by <i>Metering Providers</i>, and</p> <p>10. the delivery up to <i>AEMO</i> of data, works, material and other property that <i>AEMO</i> has the right to in the event of the deregistration of a <i>Metering Provider</i>.</p> <p>If these are firm requirements and obligations on MPs then these should have high level obligations in the Rules and more detailed requirements in the Metrology Procedure.</p>		<p>and meter register data as detailed in the Metrology Procedure and associated procedures</p> <p>3. the resolution of disputes between <i>AEMO</i> and <i>Metering Providers</i>,</p> <p>Unsure what this obligation is? These disputes are presumably handled under the dispute process as defined in 7.4.2 (ba).</p> <p>4. the access of <i>AEMO</i> to and the inspection and audit by <i>AEMO</i> of any equipment or database maintained by <i>Metering Providers</i>,</p> <p>Rewrite as: The MP must provide access <i>AEMO</i> to and the inspection and audit by <i>AEMO</i> of any equipment or database maintained by the MP.</p> <p>5. the insurance which must be taken out by or on behalf of <i>Metering Providers</i>,</p> <p>Rewrite as: The MP must take out insurance as detailed in ?????</p> <p>6. subcontracting by <i>Metering Providers</i>,</p> <p>Rewrite as: The MP when subcontracting work associated with fulfilling their obligations must ensure ????? as defined in ?????</p> <p>7. the software and systems that are used by <i>Metering Providers</i>,</p> <p>Unsure what the specific high level obligation envisaged here</p>

	Clause	Issue	Rating	Recommendation
				<p>is? Based on the AEMC response to the PC/CP query on this item then maybe the obligation is:</p> <p>The MP must “have compatible systems and processes to support the market”. However this is still less than clear.</p> <p>8. maintenance of quality systems accreditation,</p> <p>The MP must establish and maintain quality systems accreditation for their ????? consistent with details in ????</p> <p>9. the ownership of intellectual property that is developed or used by <i>Metering Providers</i>, and</p> <p>Unsure what the specific high level obligation envisaged here is? UED raised this question in the initial submissions (including the obligation for AEMO to provide fair and reasonable compensation” for the assets and IP involved, but the AEMC response still left the matter unclear.</p> <p>10. the delivery up to <i>AEMO</i> of data, works, material and other property that <i>AEMO</i> has the right to in the event of the deregistration of a <i>Metering Provider</i>.</p> <p>Rewrite as: The MP must in the event of their deregistration deliver up to <i>AEMO</i> data, works, material and other property that <i>AEMO</i> has the ownership right to ?????? as defined in the ??????</p> <p>The AEMC response to the UE initial submission on this did not provide any understanding of what would be an example of a “tangible asset where AEMO has ownership rights”. It should be clear what assets are envisaged.</p>

	Clause	Issue	Rating	Recommendation
28.	7.4.2 (bc) SP AusNet number (1)	Unless the concept of agency databases is reintroduced to cope with the issues of the distributed metering register as raised by SP AusNet, there is no longer an <i>agency metering database</i> .		1. cooperation with <i>AEMO</i> and any person engaged by <i>AEMO</i> to operate any relevant <i>agency metering database</i>,
29.	7.4.2A (e)	Reference in this clause should be to (f) not (d)	M	Change reference
30.	7.4.2A (c) and (d)	The comments made by SP AusNet against clause 7.2.2 (bb) and (bc) above re the open ended nature of the clauses apply here also.	H	Make further wording change to align with the agreed concept of this being an exhaustive list.
31.	7.4.2A (f)	Reference in this clause should be to (e) not (d)	M	Change reference
32.	7.4.2A (d)	<p>The comments made by SP AusNet against clause 7.2.2 (bc) above re the need to turn this list of statements into obligations more akin to the role of the Rules, is applicable with respect to this MDP list also.</p> <ol style="list-style-type: none"> 1. requirements relating to cooperation with <i>AEMO</i> and any person engaged by <i>AEMO</i> to operate any relevant <i>agency metering database</i>, 2. the confidentiality of information collected by <i>Metering Data Providers</i>, 3. the resolution of disputes between <i>AEMO</i> and <i>Metering Data Providers</i>, 4. the access of <i>AEMO</i> to and the inspection and audit by <i>AEMO</i> of any equipment or database maintained by <i>Metering Data Providers</i>, 5. the insurance which must be taken out by or on behalf of <i>Metering Data Providers</i>, 6. subcontracting by <i>Metering Data Providers</i>, 7. the software and systems that are used by <i>Metering Data</i> 	H	Make clear statements of obligation consistent with the approach suggested for the items in 7.2.2 (bc).

	Clause	Issue	Rating	Recommendation
		<p><i>Providers,</i></p> <p>8. maintenance of quality systems accreditation, 9. the ownership of intellectual property that is developed or used by <i>Metering Data Providers</i>, and 10. the delivery up to <i>AEMO</i> of data, works, material and other property that <i>AEMO</i> has the right to in the event of the deregistration of a <i>Metering Data Provider</i>.</p>		
33.	7.4.3	<p>SP AusNet made the comments in its initial submission regarding the need for the Rules to provide improved coverage of the service provider de-registration process. SP AusNet raised concerns regarding there being no requirement for a dispute process and that materiality was an essential but missing element of the Rules coverage.</p> <p>The AEMC response appeared to agree that these matters were important but not important enough to require Rules coverage. AEMC suggested that the AEMO's "Service Provider Compliance Assessment Procedure" was sufficient.</p> <p>As we stated in our initial submission "(whilst) SP AusNet agree that the market data processes must be protected, the business viability of the service provider is likely to be impacted by an adverse finding". We consider that the Rules should provide more detail on the coverage of the relevant procedure.</p>	H	Revise the clause such that the Rules provide firmer basis for the relevant procedure.
34.	7.4.3	<p>The AEMC response to the SP AusNet initial submissions regarding deregistration concerns was to suggest that the current AEMO "Service Provider Compliance Assessment Procedure" provide coverage.</p> <p>Whilst SP AusNet, as noted in the item immediately above does not agree that this current procedure is sufficient, it</p>	M	<p>Rather than create a new de-registration procedure, AEMC should direct AEMO to incorporate de-registration matters into the existing AEMO "Service Provider Compliance Assessment Procedure".</p> <p>We note that under clause 7.1.3, as clarified in a manner consistent with SP AusNet comments, this procedure would</p>

	Clause	Issue	Rating	Recommendation
		does consider that this is a good basis for the detailing of service provider compliance matters and that the creation of yet another procedure as suggested by the AEMC drafting appears unnecessary.		be subject to the Rules consultation process.
35.	7.4.3	<p>Whilst AEMC has recognised the need for the Responsible Person (and/or the responsible party for metering data services under the current AEMC drafting) to be involved in the deregistration process, SP AusNet consider that this involvement must be “earlier” than after the review. As SP AusNet stated in its initial submission:</p> <p>“The Responsible Person’s ability to fulfil their obligations would be significantly impacted if the accredited service provider they have chosen can no longer carry out the services in the Responsible Person’s engagement agreement. This could leave the Responsible Person exposed to breaches or at least impose a heavy requirement to negotiate a substitute service provider at short notice. The Responsible Person must be kept informed of the progress of the process and should be consulted during the review period.”</p>	M	SP AusNet suggest that the Responsible Person (and/or the responsible party for metering data services under the current AEMC drafting) be informed of the breach in the step defined in 7.4.3 (b). This provides the Responsible Person with the maximum amount of time to investigate potential alternate providers.
36.	7.5.1	<p>SP AusNet made the following comments in its initial submission:</p> <p>We know that the Meter Register in MSATS does not contain, for most meter installations, anything like the full set of information specified in Schedule 7.5. Much of the information is actually held in “agency” databases by the MP and the MDP .</p> <p>This is currently the situation for the metering database where the MDAs as AEMO agents have a metering database</p>	H	<p>SP AusNet’s suggested action was:</p> <p>Confirmation of the approach regarding responsibility for the Meter Register is required.</p> <p>AEMC in their response to this question stated:</p> <p>The metering register should reside only in the <i>metering database</i> managed by AEMO.</p> <p>However as we stated in our initial submission this is not the</p>

	Clause	Issue	Rating	Recommendation
		<p>on AEMO's behalf. This however is generally to be put aside with the concept that the MDP will hold a Metering Data Services Data Base not the Metering Database.</p> <p>However if this clause is to remain as drafted in the Rule change proposal, with AEMO still with the responsibility for the full meter register with all information in Schedule 7.5, then the concept of agency meter register databases will remain. The Responsible Person will presumably not be responsible for the Meter Register as dual responsibility makes no sense. Is this the intention?</p> <p>The alternative would be to "split" the Schedule 7.5 information into a component which must be held by AEMO in MSATS (the settlements and transfer critical components) and assign the remainder to the MP and the MDP as appropriate.</p>		<p>case. In fact some of the Schedule 7.5 details, eg test details, are held by the MP as paper records.</p> <p>This needs to be given further consideration by AEMC to align the Rules with the actual situation.</p>
37.	7.6.3	<p>In SP AusNet's initial submission we raised the question with respect to AEMO audits of the newly defined <i>metering data service database</i>.</p> <p>On reflection the SP AusNet wording could have been clearer as evidenced by the AEMC response which did not relate to the matter we were trying to raise.</p> <p>7.6.3 provides for audit of the metering data in the AEMO <i>metering database</i> by comparison with the data held in the <i>metering installation</i>.</p> <p>However SP AusNet's query relates to whether audits will be expected between:</p> <ul style="list-style-type: none"> o metering data held in the MDP's <i>metering data service</i> 	H	<p>There would appear to be a need for a <i>metering data service database</i> / MDP audit equivalent of this Clause.</p>

	Clause	Issue	Rating	Recommendation
		<p><i>database</i> by comparison with the data held in the <i>metering installation, and</i></p> <ul style="list-style-type: none"> ○ metering data held in the MDP's <i>metering data service database</i> by comparison with the metering data held in AEMO's <i>metering database</i>. <p>There would now appear to be a hole in the end to end data process which is not directly subject to specific audit under the Rules</p>		
38.	7.7 (a)	The AEMC has correctly identified that access directly to the meter to obtain <i>energy data</i> should be covered by this section, however as now written it is unclear which of the list of parties can have access to <i>meter data</i> and which are only able to get metering data delivered.	H	The clause needs to be clear in each of the items (1) to (9) as to what "category" of access is available (just delivery or direct access to the meter also).
39.	7.7 (a)(7)	<p>Jemena in their initial submission pointed out that this clause limits the customer to requesting data from their FRMP.</p> <p>Whilst the matter of data access is being reviewed in both jurisdictional and national forums (NECF) it is unlikely that this restriction will be supported and, even if only as a last resort, the LNSP is will be required to provide customer data directly.</p>	M	AEMC should review their response on this matter.
40.	7.7 (c) and (c1)	<p>Consistent with other wording changes made by AEMC to the original AEMO proposal the wording should make it clear whether the party is "getting access to data" or "being provided with data". As the MDP and the party responsible for data services can only send data then these clauses should use the term "provide or provision of".</p> <p>Clause 7.7 (g) covers the "access" to data by the Responsible Person/MP.</p>	M	Revision wording as suggested.

	Clause	Issue	Rating	Recommendation
41.	7.8.2 (c)	This clause should only refer to the <i>energy data</i> not to <i>metering data</i> . The MP is not involved in sending metering data and a password is not required.	M	Revised wording as suggested.
42.	7.8.4 (d)	The remainder of 7.8.4 uses the term “alteration” for the substitution of data necessary to compensate for a data error introduced by a meter test. It should be noted that in the metering data services database this will be classified as a substitution as per clause 7.8.4 (c)(2). In other sections of Chapter 7 reference is made to “adjustments and substitutions”. This is unnecessary and confusing. SP AusNet has made appropriate comments against these clauses.	M	This clause should not introduce another term of “adjustment”.
43.	7.9.1(b)	As raised by SP AusNet in comments against clause 7.5.1 the <i>metering register</i> is not held by AEMO entirely in the <i>metering database</i> but rather is held partly by the MP and the MDP. This clause then may need to be retained if AEMO is to retain the obligation to hold all the <i>metering register</i> content.	H	Potentially retain this clause depending on AEMC consideration of the way the <i>metering register</i> is to be covered in the Rules.
44.	7.9.4 (f)	This reads: (d) Where metering data fails validation by NEMMCO in the preparation of settlements ready data and <u>MDP replacement</u> metering data is not available within the time required for settlements then NEMMCO must prepare a substitute value in.....	M	The AEMO substitution of metering data is a last resort process and the opportunity must be given to the MDP to provide replacement data for settlement. Add suggested underlined words for clarity
45.	7.9.4 (e)	The use of the term “best” endeavours is inappropriate here. The cost of fulfilling a best endeavours obligation could be	H	Whilst SP AusNet considers that the wording added by AEMC based on initial submission is appropriate, it does not

	Clause	Issue	Rating	Recommendation
		prohibitive and would be a barrier to service provider competition. This should be “reasonable” endeavours.		overcome the issue of “best” endeavours rather than a “reasonable” endeavours requirement. Revise wording.
46.	7.9.4 (e)	There is no obligation that the service providers have a 24/7 operation. The specification of 24 hour response is inappropriate.	M	The response time should be “within 1 business day”
47.	7.9.5	<p>SP AusNet made the following comments in its initial submission:</p> <p>The testing under 7.6 can be carried out by AEMO or the Responsible Person. As stated in the Rules 7.6.1 (c) the primary responsibility is with the Responsible Person, and AEMO only carry out the test if the Responsible Person does not agree to a test.</p> <p>However the wording in this Clause does not recognise the Responsible Person’s test role, rather referring only to AEMO.</p> <p>A likely scenario is the Responsible Person undertakes the test and:</p> <ul style="list-style-type: none"> • if the error is > 1.5 times the permitted error the MDP substitutes the data (using the rule in (a) regarding start time if necessary) and provides this to AEMO and Participants. • If the error is < 1.5 times the permitted error the MDP would consult AEMO as to whether substitution is required. If required then AEMO would advise the MDP to substitute the data. The MDP substitutes the data (using the rule in (a) regarding start time if necessary) and provides this to the AEMO and Participants. <p>AEMO would only independently substitute under the</p>	M	<p>The first clause should be written as</p> <p>(a) If a <i>metering installation</i> test, inspection or audit, carried out in accordance with rule 7.6, demonstrates errors in excess of those prescribed in schedule 7.2 AEMO or the Responsible Person as relevant must ensure the data is substituted.</p> <p>(a1) If the Responsible Person or AEMO as relevant is not aware of the time at which that error arose, the MDP must substitute the data on the basis that the error is deemed to have occurred at a time half way between the time of the most recent test or inspection which demonstrated that the <i>metering installation</i> complied with the relevant accuracy requirement and the time when the error was detected.</p> <p>AEMO will not have a role in the process if the Responsible Person carried out the test and error is greater than 1.5 times Schedule 7.2.</p>

	Clause	Issue	Rating	Recommendation
		<p>scenario in 7.9.4 (f).</p> <p>The AEMC in their response suggested that the Responsible Person is included by reference to 7.6.</p> <p>However SP AusNet do not agree.</p>		
48.	7.9.5 (c)	<p>7.9.5 (c) in its second line incorrectly references the “<i>responsible person financially responsible Market Participant</i>”. This should be revised to the correct party; Responsible Person (or person responsible for meter data services, if the AEMC drafting for a split of the Responsible Person role stands).</p>	M	Reword
49.	7.11.1	<p>SP AusNet in its initial submission raised some issues with section 7.11 and suggested some reasonably significant drafting changes. The AEMC have adopted some of these changes and not others. This has left this section still somewhat unclear. We realise that the format of our initial submission was not very clear and have drafted the table at the end of our submission which we consider better states our concerns with the AEMC proposed drafting and sets out the SP AusNet suggested revisions.</p> <p>Note SP AusNet has also made comments in the items immediately below regarding specific aspects of the AEMC drafting of the clauses in section 7.11.1.</p> <p>SP AusNet has not attempted to bring these comments into the table at the end of our submission which is focussed solely on the “structure” to better align with meter types.</p>	H	
50.	7.11.1 (a)	<p>Use of the phrase “has the capability for remote acquisition” is problematic.</p>	H	SP AusNet is unclear how these issues should be handled in the drafting. The phrase “has the capability for remote acquisition” should be replaced with “where data is collected

	Clause	Issue	Rating	Recommendation
		<p>Generally all interval capable meters have the capability for a modem to be connected for remote data gathering, and in Victoria all AMI meters will have this remote acquisition capability but when installed will not necessary be in an area with communications in place.</p> <p>Further these Victorian AMI meters even when communications enabled will be classified as type 5 with type 5 type delivery timeframes obligations in the market. These meters will hence “look” like the meters categorised in clause 7.11.1(c), but will be identified as type 5 which are categorised in SP AusNet’s (new d) and (new e) clauses.</p>		by remote acquisition” however this replacement does not provide rigorous coverage of the Victorian AMI remote read type 5 situation.
51.	7.11.1 (a) (1)	This clause should make reference to the “ relevant level of accuracy” consistent with equivalent clause 7.11.1 (b) (1) etc	M	Add “relevant” to wording.
52.	7.11.1 (b)(2), (c)(2) and (new e) (2) and (f) (2)	<p>In the General Section Item 3 of this Submission SP AusNet has somewhat reluctantly accepted the AEMC view that a rationalisation of the metrology regulatory document regime will not be done in association with this Rule change.</p> <p>However we are concerned that a fundamental parameter such as metering data timeframe requirements are not expected to be defined in the Metrology Procedure alone. We consider therefore that in these Clauses the reference to “the relevant service level procedure” should not be included.</p>	H	Delete the reference to the service level document
53.	7.11.1 (c)(3)	It is unclear why this clause contains additional wording compared to (b)(3)	L	Align wording
54.	7.11.2 (a) (10)	The MDP must notify the Responsible Person of a meter malfunction within 1 business day, however it does not specify from when the 1 day is measured.	M	Logically it can only be within 1 business day of the identification of the malfunction by the MDP

	Clause	Issue	Rating	Recommendation
55.	7.11.2 (b)	<p>SP AusNet made the comment in our initial submission that this Clause must be redrafted to incorporate a number of the concepts in the equivalent Responsible Person/MP clauses 7.3.1(c) and (g).</p> <p>We stated that it was important that the responsibilities with respect to additional data services to be potentially supplied through an MDP's systems did not interfere with the services being provided under an agreement with the Responsible Person (or the person responsible for meter data services under the AEMC split responsibility drafting approach).</p> <p>The AEMC's response was that "this (the additional services) should not compromise its primary role of providing metering data services".</p> <p>The role of the Rules should be to ensure that the AEMC's "should not" be turned into a "must not", and to reinforce with MDP's that their "primary" role is to their market role as per their agreement with the Responsible Person (or the person responsible for meter data services under the AEMC split responsibility drafting approach).</p> <p>It should be clear that the decision as to whether they have not lost focus of this primary role should rest with the Responsible Person (or the person responsible for meter data services under the AEMC split responsibility drafting approach). It is they who will suffer the Regulator's impacts if the MDP services are compromised.</p> <p>Further the request for additional data services could come from any of the parties nominated in clause 7.7</p>	H	<p>Replace (b) with the wording which is based as shown on 7.3.1(c) :</p> <p>(b) any persons entitled to receive <i>metering data</i> or <i>NMI Standing Data</i> under clause 7.7 may, with the agreement of the responsible person (or the person responsible for meter data services under the AEMC split responsibility drafting approach). (which cannot be unreasonably withheld), arrange for <u>provision of data services</u> in addition to, or which enhance, <u>data services</u> specified in paragraph (a).</p> <p>Add new clause based as shown on 7.3.1(g):</p> <p>(c) Where <u>data services</u> in addition to <u>those specified in paragraph (a) are provided</u> then the Responsible Person (or the person responsible for meter data services under the AEMC split responsibility drafting approach). when agreeing to the additional <u>data services</u> as required by (b) must use reasonable endeavours to ensure that</p> <p>(1) the full costs of this work is met by <u>the persons requesting the additional service</u>; and</p> <p>(2) that additional service must not cause an infringement of the requirements of the Rules or other obligation which the Responsible Person (or the person responsible for meter data services under the AEMC split responsibility drafting approach). must fulfil <u>for data services</u>;</p>

	Clause	Issue	Rating	Recommendation
56.	7.11.3 (a)	<p>The AEMC's rewrite of the subclauses (a) and (c) in the AEMO drafting has improved this aspect of defining data storage. However there are still some issues with the drafting:</p> <p>The requirement of (a) (1) is to have the data for 13 months in a database and format which allows routine access. The requirement of (a) (2) is to have data for the remainder of 7 years available, but it can be in database and format which is accessible but not necessarily in a "routine" manner.</p> <p>The requirement of (a) (3) (was (c)(1)) requires the data from the meter (before it is processed ie largely a direct replicate of the <i>energy data</i>) to be stored for 7 years. Note that this is not defined by the terms <i>accumulated metering data</i> or <i>interval metering data</i> as these terms cover data after it is processed (eg substituted) by the MDP as well as before it is processed.</p> <p>SP AusNet consider that the drafting we recommended in our initial submission (which was a modified version of the AEMO drafting) is closer to defining these requirements. However we agree that the phrase "in the form in which it was collected" is still unclear and this concept must be defined. AEMO may suggest some better wording.</p> <p>We have suggested removal of the term "adjustment" based on our comments on clause 7.8.4</p>	H	<p>(a) <u>Subject to (c)</u> Metering Data Providers must <u>retain metering data in the metering data services database</u> for all relevant metering installations:</p> <p>(1) online for 13 months in an accessible format; and (2) following the retention under subparagraph (1), in archive in a form that is accessible independently of the format in which the data is stored for a period of 5 years and 11 months.</p> <p>(c) <u>Metering Data Providers must retain the following metering data in the metering data services database for all relevant metering installations for a period of 7 years:</u></p> <p>(1) <u>metering data</u> in the form in which it was collected; <u>and</u> (2) records of each adjustment or substitution to the metering data</p>
57.	7.11.3 (e)	<p>SP AusNet is not comfortable with the term "notify" in this Clause. Realistically the process will be that the MDP will correct and redeliver that data and by this action the affected parties incl AEMO will become aware of the new data. There will not be an actual notification in the plain language</p>	H	<p>Wording should be changed to reflect practise. If AEMO expects specific notification "transaction" then this should be made clearer including the circumstances in which this will be required.</p>

	Clause	Issue	Rating	Recommendation
		<p>understanding of the word.</p> <p>The AEMC stated that they preferred to retain “notify” as this was understood by industry. It does not however appear to be good regulatory drafting to use the word “notify” when the action by the MDP is “revise the data and send a new version to AEMO and affected participants”. The Rules drafting should to the extent possible be stand alone and not reliant on “industry understanding”.</p>		
58.	7.11.3 (e)	There is no obligation that the service providers have a 24/7 operation. The specification of 24 hour response is inappropriate.	M	The response time should be “within 1 business day”
59.	7.11.3 (f)	Wording issue	L	Reword as follows: Add “AEMO” after the word “by” in the second line.
60.	7.11.3 (i)	<p>SP AusNet is its initial submission commented:</p> <p>It is unclear what this clause adds with respect to the processes to be implemented by MDPs. The Rules and the MEP establishes the requirements, and the accreditation process enables AEMO to ensure that the MDP has the systems, processes and resources to meet these requirements.</p> <p>AEMC’s response suggested that they wanted to retain this clause because, although they recognised the duplication of the stated need to seek approval for data processes, they considered it “helps to ensure that collection methods are sound”.</p> <p>SP AusNet consider that duplication of obligations across different regulatory documents is not a legitimate mechanism</p>	M	Delete Clause.

	Clause	Issue	Rating	Recommendation
		for ensuring compliance. As SP AusNet has argued elsewhere overlap of requirement and obligations across metrology documents is not desirable.		
61.	7.11.3 (j)	<p>Refer to SP AusNet submission on Rule 7.2.2 (d) (2) with respect to manual meter reading obligations associated with remote acquisition failure.</p> <p>We recognise however that whatever the ultimately determined rules are with respect to manual reads for remote acquisition failure there must be corresponding obligations on the service providers to support this reading.</p> <p>However this clause is rather confusing and may not (is likely not?) to match the processes involved. The MDP would either read the meter manually themselves (the most likely option when the meter is a small customer remote read meter, particularly if it is installed by the LNSP) or the MDP would go directly to the Responsible Person for the meter installation. It would appear superfluous to involve the party responsible for the provision of metering data service.</p>	H	<p>The clause should be rewritten to better reflect the process.</p> <p>When the rewrite is done the meter installation Responsible Person obligation would better be defined as “must ensure that the meter provider provides the MDP with that metering data. This better reflects the Responsible Person role.</p>
62.	7.11.5	<p>SP AusNet considers that the removal of the part (b) of this section has left a hole in the Rules coverage. We would not consider it appropriate to just leave this relatively fundamental market data process and obligation to the clause 7.14.1 (6) which defines the content of the Metrology Procedure.</p> <p>As per our comments on 7.14.1 (6) that clause needs to reference the fundamental obligation in another clause and the referenced clause should contain matters similar to that in the deleted 7.9.3.</p>	M	Reword 7.9.3 to remove the issues raised in our initial submission and reinsert here as 7.11.5 (b)

	Clause	Issue	Rating	Recommendation
63.	7.14.1 (c)	<p>In our comments on the Glossary we have raised issues with respect to the definition of “telecommunications network” and specifically regarding the wording that this must have “....been approved by AEMO”.</p> <p>As this is one of only two current references to the “telecommunications network” in the body of Chapter 7 we have raised this matter here also.</p> <p>Whatever the detailed responsibility and roles are with respect to the provision, performance, characteristics, etc of the telecommunications network now, or for the metrology of Smart meters, the Rules assignment of the fundamental obligation to approve the telecommunications network should not be included in the Glossary.</p>	H	Consistent with good drafting practice the fundamental obligation for approval of the telecommunications network should be relocated from the Glossary to Chapter 7.
64.	7.14.1 (c)	<p>This Rules version is absolutely silent with respect to what high level criteria the AEMO must use for the approval of the telecommunications network.</p> <p>As stated in the General Comments Item 1 of this Submission the telecommunications network under any rollout of smart meters is likely to be significantly different to the public telecommunication network current used for remote data acquisition.</p> <p>However even if this Rules version avoids including broad aspects of smart meters there are two matters which SP AusNet consider must be included to provide high level regulatory support the AEMO telecommunication network approval role.</p> <p>Firstly the lack of any basis of AEMO approval of the existing public telecommunications network usage by MDPs must be</p>	H	<p>AEMO should provide a statement of their approval criteria for AEMC consideration and potential inclusion in the Rules.</p> <p>For the existing public telecommunication network usage this could be as simple as the fact that it is a public network controlled by the ACMA rules and parameters, etc. For the mesh radio and WiMAX radio system involved in the Victorian rollout this may require may detailed drafting.</p>

	Clause	Issue	Rating	Recommendation
		<p>overcome, and</p> <p>Secondly the basis for the AEMO approval of the Victorian distributors' telecommunication networks, the first of which has recently started delivering market data, must be defined.</p>		
65.	7.14.1 (c) (4) (ii)	As suggested in the SP AusNet initial submission this clause should include timeframe obligations not only for settlements but also data delivery to Participants for billing.	M	Reword
66.	7.14.1A (b)	<p>In General Comments above Item 3 SP AusNet have argued strongly that the AEMC's directive to AEMO with respect to the rationalisation of the metrology document regulatory structure should establish a firm date for the first service provider Procedure which allows sufficient time for the establishment of some fundamental principles regarding the relationship between the Rules, the Metrology Procedure and the SL Procedures (and other guidelines and procedures).</p> <p>The initial service provider SL Procedure should not just perpetuate the current SLRs under a new title. This should be seen as a key first step in rationalising the metrology document regime.</p>	H	AEMC to arrive at a date with AEMO that allows for the principles development and rationalisation of the initial SL Procedure.
67.	7.14.1A (c)	<p>As identified in General Comments above, Item 3, and in our comments on clause 7.14.1A (b) we consider that some principles are required regarding the content of the various metrology documents.</p> <p>We suggest that key principles and aims for the metrology documents should include the criteria that:</p> <ul style="list-style-type: none"> ○ there should be a document hierarchy (Although more work is obviously required on details, SP AusNet would 	H	<p>The AEMC drafting should:</p> <ul style="list-style-type: none"> ○ Provide key principles for the metrology document hierarchy ○ Provide instruction to AEMO to ensure that the initial SL Procedure meets these key principles

	Clause	Issue	Rating	Recommendation
		<p>suggest something like: higher level and largely fixed obligations in the Rules; lower level and potentially less fixed obligations in the Metrology Procedure; and detailed obligations regarding process and advisory material in the SL Procedures, other procedures and guidelines.</p> <ul style="list-style-type: none"> ○ obligations should be imposed in one document only (and referenced in lower documents) ○ there should be no inconsistency between documents. <p>SP AusNet considers that there is sufficient fundamental basis for these principles for them to be included in this Rules change so that AEMO have a clear, AEMC endorsed basis for their development and publishing of the initial SL Procedure.</p> <p>Most of the items in this clause which <u>must</u> be included in the SL Procedure are also covered in the Metrology Procedure. The content of the SL Procedure with respect to these items must be such that it is aligned with the key principles above.</p> <p>The AEMC drafting should make it clear that for each of these items AEMO should ensure that the SL Procedure only contains detailed process obligations and advisory material.</p>		
68.	7.14.1A	To avoid issues of overlap and inconsistency, which are likely to arise no matter how diligently AEMO carry out the AEMC assigned role of rationalisation of the metrology document regime (and certainly will arise with current overlapping scope and coverage) the Rules should establish a hierarchy and make it clear that in matters of difference the Metrology Procedure should prevail.	H	Add Clause.

	Clause	Issue	Rating	Recommendation
69.	S7.2.1(b)	<p>SP AusNet raised some questions re this clause in our initial submission. The AEMC changed the clause wording but it is still unclear whether a change of accuracy under this clause requires agreement of the Responsible Person as per 7.3.1(c) rather being subject to a “requirement”.</p> <p>We note the word “may” is missing before “require” in the first line of this clause.</p>	M	Reword for clarity
70.	S7.2.3 Item 3 (6) (ii)	<p>This item states</p> <p>(6) the <i>metrology procedure</i> must: (ii) set out the method by which <i>estimated metering data</i> is prepared during the period when the <i>accumulated metering data</i> is not available.</p>		<p>It should read:</p> <p>(6) the <i>metrology procedure</i> must: (ii) set out the method by which <i>estimated metering data</i> is prepared during the period when the <i>interval accumulated metering data</i> is not available.</p>
	Glossary			
71.	Telecommunications network	<p>Refer to SP AusNet comments on Rule 14.1</p> <p>The performance and the accreditation/audit processes for the telecommunication network has been largely a non issue to date as this has almost exclusively been the public telecommunications network. Even if this was not providing satisfactory performance for an individual NMI there was largely nothing that AEMO as the party responsible could do to improve that performance.</p> <p>However with the advent of mass remote read Smart meters this will no longer be the case. It is therefore inappropriate to leave the obligation with respect to this important aspect of the end to end data process in the Glossary. It must be made more transparent in Chapter 7.</p>	H	Add wording in body of Chapter 7 regarding performance assurance for the telecommunication network

Section 7.11.1 Suggested Approach

SP AusNet in its initial submission raised some issues with section 7.11 and suggested some reasonably significant drafting changes. The AEMC have adopted some of these changes and not others. This has left this section still somewhat unclear. We realise that the format of our initial submission was not very clear and have drafted the following table which we consider better states our concerns with the AEMC proposed drafting and sets out the SP AusNet suggested revisions.

As we stated in our initial submission:

SP AusNet has tried to keep the general construct of the existing Clauses, but considers that a complete rewrite would ultimately better define these important aspects of data requirements. Included in such a rewrite would be the relocation to a common clause of the common subclauses regarding performance standards, etc.

Note SP AusNet has also made comments in the broader submission table above about specific aspects of the AEMC drafting of the clauses in section 7.11.1.

SP AusNet has not attempted to bring these comments into the table below which is focussed solely on the “structure” to better align with meter types. Importantly SP AusNet in the table below has not attempted to interpret where Smart meters, and where the remotely read type 5 meters in the Victorian AMI rollout, fit into this structure. We have made some comments on this in our broader submission table above.

As drafted by AEMC	SP AusNet interpretation	SP AusNet rewrite to add clarity and better align with meter types
7.11.1 Metering data		
(a) In accordance with paragraphs (b) and (c), <i>AEMO</i> requires delivery of <i>interval metering data</i> for all <i>trading intervals</i> where the <i>metering installation</i> has interval data capability and has the capability for <i>remote acquisition</i> of this data.	This clause is applicable to all type 4 meters ie interval meters remotely read.	
(b) Where <i>AEMO</i> requires actual <i>metering data</i> to ensure compliance with Chapter 3, the <i>interval metering data</i> required under paragraph (a) must be: (1) derived from a <i>metering installation</i> compliant	This clause is applicable to type 4 meters where the actual interval data is required by <i>AEMO</i> to meet settlement timeframes. There are NO forward estimates associated with this category of type 4 meter. These are the type 4 meters currently in service in the	(b) Where interval data is collected by remote acquisition from a meter and <i>AEMO</i> requires actual <i>metering data</i> to ensure compliance with Chapter 3, the <i>interval metering data</i> required under paragraph

As drafted by AEMC	SP AusNet interpretation	SP AusNet rewrite to add clarity and better align with meter types
<p>at the level of accuracy for <i>metering installations</i> prescribed in schedule 7.2;</p> <p>(2) within the timeframe required for <i>settlements</i> and <i>prudential requirements</i> specified in the <i>metrology procedure</i>, and the relevant <i>service level procedures</i>;</p> <p>(3) actual or substituted in accordance with the <i>metrology procedure</i>; and</p> <p>(4) in accordance with the performance standards specified in the <i>metrology procedure</i>.</p>	<p>market.</p> <p>We suggest that the additional phrase in (b) and (c) more clearly “links” these clauses back to (a) and limits coverage to that of (a) ie type 4 meters.</p>	<p>(a) must be:</p> <p>1) derived from a <i>metering installation</i> compliant at the level of accuracy for <i>metering installations</i> prescribed in schedule 7.2;</p> <p>(2) within the timeframe required for <i>settlements</i> and <i>prudential requirements</i> specified in the <i>metrology procedure</i>, and the relevant <i>service level procedures</i>;</p> <p>(3) actual or substituted in accordance with the <i>metrology procedure</i>; and</p> <p>(4) in accordance with the performance standards specified in the <i>metrology procedure</i>.</p>
<p>(c) Where <i>AEMO</i> does not require actual <i>interval metering data</i> to ensure compliance with Chapter 3, the <i>interval metering data</i> required under paragraph (a) must be:</p> <p>(1) derived from a <i>metering installation</i> compliant with the relevant level of accuracy for <i>metering installations</i> prescribed in schedule 7.2;</p> <p>(2) within the timeframe required for <i>settlements</i> specified in the <i>metrology procedure</i> and the relevant <i>service level procedures</i>;</p> <p>(3) actual, substituted or estimated in accordance with the standards related to performance requirements as specified in the <i>metrology procedure</i> and</p> <p>(4) in accordance with the performance standards</p>	<p>This clause is applicable to type 4 meters where the actual interval data is NOT required by AEMO to meet settlement timeframes. The data for settlements can therefore be based on forward estimates.</p> <p>There are NO type 4 meters of this type currently in service in the market. This “sub category” of remotely read interval meter (type 4) was established in the 2008 (?) Rules change as the forecast at the time of what the requirements for a smart meter for small customers would be. This was before the concept of daily data for small customers was developed as a retailer requirement for smart meters.</p> <p>There are currently no Metrology Procedure requirements and service levels associated with this type of meter.</p>	<p>(c) Where interval data is collected by remote acquisition from a meter and <i>AEMO</i> does not require actual <i>interval metering data</i> to ensure compliance with Chapter 3, the <i>interval metering data</i> required under paragraph (a) must be:</p> <p>(1) derived from a <i>metering installation</i> compliant with the relevant level of accuracy for <i>metering installations</i> prescribed in schedule 7.2;</p> <p>(2) within the timeframe required for <i>settlements</i> specified in the <i>metrology procedure</i> and the relevant <i>service level procedures</i>;</p> <p>(3) actual, substituted or estimated in accordance with the standards related to performance requirements as specified in the <i>metrology procedure</i> and</p>

As drafted by AEMC	SP AusNet interpretation	SP AusNet rewrite to add clarity and better align with meter types
specified in the <i>metrology procedure</i> .		(4) in accordance with the performance standards specified in the <i>metrology procedure</i> .
	<p>SP AusNet consider for clarity a similar clause to 7.11.1 (a) (which is only applicable to remotely read interval meters) should be included above the current clause (d) which would become a modified clause (new e). These new clauses (New d) and (new e) would be applicable to non remotely read interval meters (t5 meters).</p> <p>By following a similar drafting approach the similarities and difference between meters covered by (a), and (b) or (c); and meters covered by (new d) and (new e), will be clearer.</p> <p>This would make reference to 7.2.3(k) which defines the obligations associated with the type 5 accumulation boundary where interval data will not be delivered.</p>	<p>(New d) Subject to 7.2.3(k), AEMO requires delivery of interval metering data in accordance with paragraph (new e) for all trading intervals where the metering installation has interval data capability and does not have capability for remote acquisition of this data.</p>
<p>(d) Where the <i>metering installation</i> does not have the capability for <i>remote acquisition</i> of actual <i>metering data</i>, <i>metering data</i> must be:</p> <ul style="list-style-type: none"> (1) derived from a <i>metering installation</i> compliant with the relevant level of accuracy for <i>metering installations</i> prescribed in schedule 7.2; (2) within the timeframe required for <i>settlements</i> specified in the <i>metrology procedure</i> and the relevant <i>service level procedures</i>; (3) as actual, substituted or estimated in accordance with the <i>metrology procedure</i> and (4) in accordance with the performance standards specified in the <i>metrology procedure</i>. 	<p>This clause is applicable to all manually read meters ie type 5 interval meters and type 6 consumption meters.</p> <p>This clause as currently written does not make it clear that for a manually read interval meter (type 5) that, similar to the requirements in clause 7.11(a) for remotely read interval meters, AEMO require delivery of <i>interval metering data</i> for all <i>trading intervals</i>.</p> <p>In the drafting that SP AusNet proposed in our initial submission, we suggested that a better structure would be to split this clause and cover type 5 interval data meters and type 6 consumption data meters separately. We still consider that this approach would add clarity to section 7.11, and hence suggest the new clauses below.</p>	

As drafted by AEMC	SP AusNet interpretation	SP AusNet rewrite to add clarity and better align with meter types
	This suggested new clause is applicable to only manually read interval meters (type 5)	<p>(new e)</p> <p>Where interval data is collected from a meter and the <i>metering installation</i> does not have the capability for <i>remote acquisition</i> of actual <i>metering data</i>, <i>metering data</i> must be:</p> <ol style="list-style-type: none"> (1) derived from a <i>metering installation</i> compliant with the relevant level of accuracy for <i>metering installations</i> prescribed in schedule 7.2; (2) within the timeframe required for <i>settlements</i> specified in the <i>metrology procedure</i> and the relevant <i>service level procedures</i>; (3) as actual, substituted or estimated in accordance with the <i>metrology procedure</i> and (4) in accordance with the performance standards specified in the <i>metrology procedure</i>.
	This suggested new clause is applicable to only meters from which non interval data is collected (type 6)	<p>(f) Where non interval data is collected from a meter <i>metering data</i> must be:</p> <ol style="list-style-type: none"> (1) derived from a <i>metering installation</i> compliant with the relevant level of accuracy for <i>metering installations</i> prescribed in schedule 7.2; (2) within the timeframe required for <i>settlements</i> specified in the <i>metrology procedure</i> and the relevant <i>service level procedures</i>; (3) as actual, substituted or estimated in accordance with the <i>metrology procedure</i> and

As drafted by AEMC	SP AusNet interpretation	SP AusNet rewrite to add clarity and better align with meter types
		(4) in accordance with the performance standards specified in the <i>metrology procedure</i> .