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21 October 2009

AEMC Rules Change  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Via electronic lodgement at [www.aemc.gov.au](http://www.aemc.gov.au)

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

Please find attached SP AusNet's submission providing comments on the AEMO proposed Chapter 7 changes: National Electricity Amendment (Provision of Metering Data Services and Clarification of Existing Metrology Requirements) Rule 2009.

We are pleased to have the opportunity to contribute to the progressive development of Chapter 7 as a more effective basis for electricity national metrology.

Yours Sincerely,

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# SP AusNet Submission on 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 - SPAN submission.doc

SP AusNet submits these comments to the AEMC in response to 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 Timing of this Rules change proposal and Rules coverage of Smart meters

AEMO in their support document for the Rules change have outlined a number of drivers for the change, however the key reason for doing this change now is stated to be the need to replace the Meter Data Agent deed structure as it has expired. However, as we understand the deed structure has already been extended there would appear to be no clear reason why it could not be extended again. The other reasons for this proposal, although bringing a range of benefits, do not have a specific time driver. SP AusNet hence questions the appropriateness of the timing of this Rules change proposal.

It is inevitable that the establishment of the national Smart meter infrastructure will require extensive Rules changes, not only to incorporate technical capability and functionality, but also to recognise and regulate the associated revised industry responsibilities. Discussion to this date in the National Smart Meter Program's, Regulatory Working Group (RWG)<sup>1</sup> has raised a number of issues and potential approaches with respect to the regulatory basis for the range of new and changed responsibilities associated with Smart meters. These include the issues associated with the allocation of responsibility and the accreditation approach for service providers providing and/or utilising the new telecommunication infrastructures which will more than likely be provided, not by "traditional" telecommunication providers, but rather by Participants through the metering infrastructure.

There are hence many aspects of the Smart meter infrastructure which overlap in a fundamental way the matters covered in this Rules change proposal. If this Rules change proceeds much of its content, and the subsequent Metrology Procedure and other regulatory document changes, will within a short period require to be re-visited to implement the ultimately agreed national framework.

SP AusNet have made comments against some of the specific Clauses where significant impacts from the national Smart meter infrastructure considerations are likely to appear. These comments have not attempted to be all inclusive, but rather are focussed on matters that are being considered in this proposed Rule change and where discussion regarding the Smart meter infrastructure regulatory basis indicate that significant change will be required for the Smart meter framework.

This overlap would appear to complicate the consultation processes, and unnecessarily consume valuable industry resource when, particularly in Victorian, such resource is largely

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<sup>1</sup> The RWG is one of a number of number of working groups established by the national smart metering National Stakeholder Steering Committee. It is charged with drafting the necessary changes to the Rules to provide the regulatory basis for the national Smart meter regulatory and technical framework.

committed to the task of achieving the Victorian Jurisdictional obligations. There would appear to have been little value and many down sides in running this consultation.

SP AusNet consider that the approach which should be now considered by the Commission is to complete the consultation, but do so on the basis that it will not have a effective date (nor follow up consultation on associated Procedure change), but rather will remain “dormant” until the national Smart meter changes are drafted and consultation completed and then be implemented as one Rules change with a single subsequent Metrology Procedure and other procedure changes.

## **2 Metrology regulatory instrument regime issues**

There has been strong recognition in AEMO's relevant reference group (the Metrology Reference Group) that the current metrology regulatory instrument regime has a number of fundamental issues.

The fundamental metrology regulatory instrument structure consists of Chapter 7 of the Rules, the Metrology Procedure, the service provider Service Level Requirements (SLRs), and the accreditation process documentation. However, whilst notionally each of these “documents” represents a different level of detail and focus, there is a significant lack of consistency and a high level of overlap between the documents. Whereas the scope of each document made some sense in the NEM as it existed at start up, this model has now been made less relevant by market changes including FRC, the national rationalisation of Jurisdictional Metrology Procedures, and the significantly more knowledgeable and experience industry Participants and service providers.

Chapter 7 reasonably contains the higher level obligations and establishes the critical parameters; the Metrology Procedure contains the detail however it also contains a significant Schedule structure which mostly just reproduces the Rules. The SLRs whilst largely a further reference to the higher level documents also contains some additional obligations. The situation has been further exacerbated by adding an ever growing number of procedures or guidelines with little or no consideration of their appropriate place in the suite, and whether their content may be best incorporated in other documents.

This is not a structure which provides a clear and unambiguous basis for this critical aspect of the NEM.

Changes continue to be pragmatically made to the documents in the regime or procedures added which suit the requirements at the time, but which just further compound and reinforce the issues with the document suite. Obligations have been added with a short term view of where they fit rather than where a well reasoned document strategy might suggest they better be. This has led to requirements which impact fundamental market obligations being inappropriately placed within the documents.

SP AusNet is not necessarily recommending a wholesale, “big bang” change of documentation, however we consider that it is appropriate as part of this reasonably significant change to Chapter 7 to take stock and to ensure that at the very least this Rule change does not just add to the less than satisfactory structure. In its Rule Change Proposal AEMO argue that improving clarity of the Rules contributes to the NEM Objective by supporting effective and transparent regulation and operation of the NEM and reducing the costs and operational risks. We support this view but consider that some aspects of the Rules change proposal complicate and confuse, rather than improve, the regulatory instrument structure, and do not take the opportunity to at least commence the process of rationalising the regulatory regime.

We consider that the minimum efforts which should be taken in this round of Chapter 7 changes is to:

- Not enshrine the SLRs as Procedures as proposed but rather ensure that the SLRs do not contain any obligations in addition to those in the Rules and the Metrology

Procedure by removing any current obligations. The Rules should rather define the requirements and scope of the SLRs and in particular specifically state that the SLRs are not to contain obligations that are in addition to those in the Rules and Metrology Procedure.

- Review the range of Procedures and Guidelines specified in the Rules with the aim of providing a consistent approach and wording to their defining obligations, their change procedure, and their “enforcement” mechanism including a dispute resolution process.

Examples are:

- Clause (g) regarding breaches and deregistration has been added to 7.2.8 regarding the MSATS Procedures but no other procedure related Clauses in the Rules have this type of specific statement .
- Clause 7.3.7 (b) regarding meter malfunctions states: “NEMMCO must establish and publish a procedure applicable to the provision of exemptions for the purpose of paragraph (a) and NEMMCO may revise the procedure from time to time.”

Clause 7.3.4 regarding meter churn states:

- (j) NEMMCO must develop and publish in accordance with the Rules consultation procedures, guidelines for the financially responsible Market Participant to consider in managing the alteration of a metering installation where one or more devices are to be replaced (meter churn guidelines)
- (k) NEMMCO may from time to time and in accordance with the Rules consultation procedures, amend or replace the meter churn guidelines referred to in paragraph (j).

Other clauses regarding procedures are also different although presumably the establishment and change processes are expected to be the same.

### **3 AEMC approach regarding submissions**

This Rules change proposal, because it is quite broad in its content, is likely to raise a significant number of comments. Chapter 7 is very intensive with a significant amount of technical content which impacts significantly on operational process across all the industry (with largely the exception of generation). There is likely to be a wide variation in the views put, and some of these whilst relevant to the aim of “clarification of existing metrology requirements” may not be against Clauses which AEMO have made changes in their proposal.

SP AusNet consider that:

- it would be valuable to the industry to be able to easily compare input from different Participants against the various Clauses in the Rules. This enables an understanding of how different individual Participants, or different Participant segments, or even different jurisdictions view the changes. SP AusNet consider that it would be of benefit to the broad industry if AEMC could publish a table setting out for each Clause comments received. Whilst a large exercise this is best done once by AEMC than multiple times across a number of Participants.
- AEMC should carefully consider the over all improvement of clarity of Chapter 7 when considering whether to act on comments which are not against Clauses specifically targeted by the AEMO proposal. The spirit of AEMO’s change is a broad one of making Chapter 7 more workable as a contribution to the NEM Objective and hence SP AusNet recommend to AEMC that their criteria before considering matters “out of scope” should be broad.

- AEMC should give consideration to matters which may impact on or be impacted by the inclusion of Smart meters in the Rules. Refer the SP AusNet comments in General Item 1 above.

#### **4 Transmission connection points and interconnectors impacts**

As a Transmission network Service Provider (TNSP), SP AusNet has concerns regarding the impact changes to responsibility for remote acquisition, and for Metering Data Provider (MDP) engagement, would have on the metering arrangements for metering installations for transmission connection points and interconnectors. Whilst the meters for which SP AusNet and other TNSPs' have responsibility for is relatively small in number they are essential to the operation of the market, and worthy of potential differential consideration.

Current Responsible Person, metering provider (MP), and metering data agent (MDA)/MDP arrangements for these connection points have a proven ability to provide the necessary quality of metrology service provision. AEMO have recognised the critical nature of these metering installations by proposing to recognise in the Rules AEMO's need to be able to override the Responsible Person's selection of MDP to ensure data quality (Clause 7.2.5(ab)).

SP AusNet have contributed to the Grid Australia submission to this Rules change proposal and support the view detailed in that submission that for transmission connection points and interconnectors, it is appropriate for AEMO to remain responsible for remote data acquisition and that the financial responsible market participant continue to select and contract the MDP.

#### **B SP AusNet Comments on Specific Clauses**

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

Clause	Issue	Rating	Recommendation
7.2.3 (c)(2)	<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”. Would it make sense for the obligation to be two way and for the FRMP to be obliged to provide these details of their prices from other contestable service provider businesses on the table in the same way?!</p> <p>2 The implementation would be difficult. The Local Network Service provider (LNSP) may organise there 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>	H	Revert the clause to the provision of terms and conditions..
7.2.3 (i)(2)	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.	M	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.
7.2.5 (a) (1)	The Responsible Person may employ more than one MP for the metering installation. Whilst Clause (c) recognises that it	M	Clause should be reworded to recognise may be one or more MPs engaged.

Refer also 7.2.5 (c)	is possible to have different installation and maintenance service providers, this could be split further eg different MPs for CTs and Communications.		
7.2.5 (ab)	<p>There is no specific accreditation for MDPs who are involved in the “high end” metering installation which are a characteristic of “transmission network connection points and interconnectors”. In recognition of this AEMO are proposing to formalise in this Clause the right to effectively “veto” the Responsible Person’s selection of MDP. Whilst this Chapter and the Metrology Procedure provide a basis of the Responsible Person-MDP relationship it is also a commercial relationship. The forcing by AEMO of the Responsible Person to select a particular MDP could make the establishment of that commercial relationship difficult. It could force the Responsible Person into a MP-MDP pairing which is not as workable as desired.</p> <p>SP AusNet consider that for this reason, and for some other reasons outlined in the General Section 4 of this Submission, AEMO should retain the responsibility for the selection of the MDP for these categories of sites.</p>	H	Apply consistent wording through various Clauses of the Chapter which retain AEMO’s responsibility for the remote acquisition of metering data for “transmission network connection points and interconnectors”.
7.2.5 (c)	The Responsible Person may employ more than one MP for maintenance of the metering installation. Whilst this Clause recognises that it is possible to have different installation and maintenance service providers this could be split further eg different maintenance MPs for meters and/or CTs and/or Communications.	M	Clause should be reworded to recognise may be one or more MPs engaged.
7.2.5 (d) (1)(2)	In the General Section Item 2 of this Submission SP AusNet have outlined a number of concerns regarding the complexity and overlap within the current regulatory instrument framework for metrology, and expressed apprehension that these Chapter 7 revisions are further compounding these	H	Remove the phrase as “and procedures authorised under the Rules” – it is the Metrology Procedure which must defined the matters in these two clauses.

	<p>concerns.</p> <p>Wording such as “and procedures authorised under the Rules” just reinforces and legitimises the lack of clear regulatory instrument coverage. Whilst this has been used occasionally in the current version of Chapter 7, in this version, frequent use of this term has further removed the broad principle that it is desirable in the Rules to provide clear reference to the relevant specific lower level instrument.</p>		
7.2.5 (d)	<p>The terminology in the Rules should support and reinforce the relative functions and roles of the Responsible Person and the service providers it has engaged (even though “legally” the difference may be not recognised). Generally the service provider has the action and the Responsible Person has the role and responsibility of ensuring the service provider carries out that action. Hence whilst (d) (1) and (2) follow this model, (3) wording has the Responsible Person “providing” rather than “ensuring” security control.</p> <p>We note that in (3) these relative roles are further confused by Clause 7.4.1(b) which states that the MP has the “responsibility” for security !!</p>	M	Change wording in Clauses with inappropriate terminology.
7.2.5 (d) (4)	<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 reference to the “telecommunications network” in the body of Chapter 7 we have raised this matter here also.</p> <p>Whatever the responsibility and roles are with respect to the</p>	H	No change in the immediate context of this change; however SP AusNet suggest that the approach for this Rules change must be cognisant of the changes for AMI, particularly with respect to the telecommunication network responsibility.

	<p>provision, performance, characteristics, etc of the telecommunications network now, or for the metrology of Smart meters, these should not be included in the Glossary.</p> <p>This Rules version is relatively silent with respect to these type of details of the responsibility for the telecommunications network as it has not attempted to provide for the regulation of these matters for smart meters. As stated in the General Section Item 1 of this Submission this may introduce a number of key changes to this aspect of the Rules as the communications network interface will become more than just a modem connected to the public telecommunication network.</p>		
7.2.5 (d) (9)	<p>The current process whereby a Participant can at any time replace the current Responsible Person's meter (the LNSP's or the FRMP's meter) without prior knowledge or approval, whilst currently recognised as part of the upgrade path for meters, has never been a fully legitimate regulatory or commercial approach. Currently the impacts of this, although a risk to data continuity, have been relatively small.</p> <p>With the advent of Smart meters the LNSP is likely to utilise the additional functionality of the advanced metering infrastructure to enhance a number of broader network functions. Smart meters could become an essential and integrated component of the LNSPs' strategy for customer load supply, outage management, and emergency control.</p> <p>In this Smart meter scenario this Clause's support for removal of the LNSP's meter must be considered as putting at risk these smart meter initiatives, and hence be counterproductive in achieving the key outcomes of the Smart meter rollout.</p>	H	The current approach to LNSP asset removal should be considered as part of the Rules change.

7.2.5 (g) (3)	Whereas this Clause regarding manually reading meters when communications have failed may make good sense when applied to the limited number of generally high end remote read meters now in service, it will not be workable when remote read meters become the mass market standard. 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.	H	The clause should be revised now to only put this obligation of RPs for meters on customers >160MWh pa. This will be consistent with the ultimate requirement for the Smart meter scenario.
7.2.5 (g) (3)	<p>This Clause puts an obligation on the Responsible Person for arranging the manual reading of meters when remote communications fails.</p> <p>However there would not appear to be a matching obligation in the Rules on MPs to provide the capabilities to carry out this reading, and to do so in appropriate timeframes when requested by the Responsible Person.</p>	H	<p>Suitable obligation should be placed on the MP to have this capability, and to respond to a Responsible Person's request within a specified period.</p> <p>This should be linked to the specified requirements for response by MPs to meter failures when notified by the Responsible Person.</p>
7.2.8 (g)	<p>In the General Section Item 2 of this Submission SP AusNet has argued that all the Rules clauses regarding procedures should be the same wording as different wording implies different obligations and processes.</p> <p>We do not consider that this new clause regarding service providers and deregistration is required as this would appear to be adequately covered by Clause 7.4.3. If it is required, then for consistency it should be added to all procedure clauses.</p> <p>We have some concerns regarding the de-registration process and will raise these against Clause 7.4.3</p>	M	Delete this clause.

7.2.9	In the General Section Item 2 of this Submission SP AusNet has argued that the SLRs role in the metrology instrument regime is not clear and that they should not contain obligations not clearly defined in the Rules and/or the Metrology Procedure. It is inappropriate to change the SLRs into procedures and hence legitimise and reinforce their providing another “place” for obligations to be established. The list of matters in 7.2.9 are already covered, at least to some extent, in the Metrology Procedure. If not adequately covered, then the Metrology Procedure should be revised. If there is overlap (and potentially inconsistency) then the SLRs should be revised to remove this overlap. The solution is NOT to reinforce obligations through creating the SLRs as procedures.	H	Remove this clause and as an outcome of consideration of this Rules change proposal recommend a program of clarifying the aim and objectives of the SLRs and revising these to more clearly meet these objectives, remove obligations above those in the Rules and Metrology Procedure, and rationalise and minimise any overlap.
7.2.9	Whether the current SLRs are retained as SLRs, or recast as procedures, the Rules should make it clear that in matters of difference the Metrology Procedure should prevail.	H	Add Clause.
7.2A.5	This Clause regarding the transition to B2B Procedures under the IEC should be removed as it has expired.	L	Remove Clause.
7.3.1 (a) (1)	It is unclear to what this Clause regarding display of cumulative total energy is referring in using the phrase “..or an equivalent accessible display...”  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.	M	Provide clarity of requirements.
7.3.1 (a) (7)	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	M	Change wording to clarify the circumstances when generation flow would be recorded.

	installed generation plant eg pv cell, then the meter installed is unlikely to be able to record any flow from this unauthorised installation.		
7.3.1 (a) (7)	The NSSC working group consideration of the specification of Smart meter functionality has settled on three terms for the hierarchy of data “actions” of a meter: data is “measured” and possibly “recorded” and possibly “stored”. It was agreed that the term “register” was not required and overlapped the other terms.	M	Replace the term “registering” with “measuring”
7.3.1 (a) (11)	This clause states regarding data storage :  “...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.	M	Wording should be “...of at least 200 days or such <del>lesser or greater other</del> period as specified in the metrology procedure
7.3.1 (b)(4)	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.	M	Relocate clause.
7.3.1 (d)	It is not the Responsible Person who applies to the LNSP for 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.	M	Change the wording to reflect the actual process.
7.3.1 (g)	This clause provides some key clarification to the content and obligations of Clause 7.3.1 (c). In (c) the Responsible Person is “instructed” that they cannot “unreasonably withhold” agreement for additional or enhanced “features” in	H	Suggested rewording similar to:  (g) Where a metering installation is used for purposes in addition to the provision of metering data to AEMO <del>and</del>

	the Metering Installation. Clause (g) should be reworded to clearly provide the basis on which a Responsible Person may withhold such agreement.		<u>market participants</u> then <u>the Responsible Person when agreeing to the additional purpose as required by (c) must use reasonable endeavours to ensure that</u> :
7.3.1 (g)	Metering data is required by more than AEMO and this should be recognised.	M	(1) that use must not cause an infringement of the requirements of the Rules <u>or other obligation which the Responsible Person must fulfil with the Metering Installation</u> ;
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	(2) the responsible person must co-ordinate with the persons who use the metering installation for such other purposes; and (3) .....
7.3.4 (l)	This Clause regarding the first meter churn guidelines has expired.	L	Remove Clause
7.3.7 (a)	<p>SP AusNet cannot understand why the term “outage” has been added in this Clause. The Clause is related to a failure or breakdown ie a “malfunction”, which requires a “repair”. Is there concern that “malfunction” may be considered <u>only</u> a partial failure in that the meter may still be recording but inaccurate data, whereas it is considered that an “outage” implies a full failure with no data recording.</p> <p>This would appear to be a misplaced concern as it would be a strange view that the Responsible Person must fix a partially failed meter but NOT a fully failed meter.</p> <p>Care must be taken if the term “outage “ is added as it implies quite strongly that a “malfunction” does not include a full failure, or “outage” only includes a full failure. All uses of the terms “outage” and “malfunction” in the Rules would then need to be revisited to ensure that the terms are used correctly with this differentiation in mind.</p>	M	Do not add the term “outage”.
7.3.7 (a) and (d)	These Clauses together do not provide a good	M	Redraft Clauses based on the “process” and the

	<p>understanding of the obligations on the Responsible Person and service providers. The Responsible Person themselves in 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"> <li>○ MDP detects malfunction</li> <li>○ MDP informs the MP and MP then fixes problem</li> <li>○ if problem cannot be repaired in the required days Responsible Person is informed by MP and applies for exemption</li> </ul> <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"> <li>○ MDP must detect malfunction and report malfunction to MP well inside timing period and Responsible Person must ensure this</li> <li>○ MP must meet the timings in (a) (1) and (2)and Responsible Person must ensure this timing is met</li> <li>○ 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</li> </ul> <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>obligations to support it.</p>
7.3.7 (a)	<p>In (1) the phrase “should reasonably have been detected” is used whilst in (2) the equivalent wording is “ought reasonably have been detected”. These should be the same word.</p>	L	<p>Replace “ought” with “should”.</p>

7.3A (f)	<p>SP AusNet cannot understand the reasoning behind this Clause. An LNSP will recover metering service costs for minimum/standard service for type 5, 6 and 7 meters thru a regulated charge. These regulated charges will either be:</p> <ul style="list-style-type: none"> <li>○ a specific excluded service charge for the service at the specific installation,</li> <li>○ a prescribed metering service charge for a category of meters or customers (ie a non specific charge but for meter aspects of the Distributor's service)</li> <li>○ part of the broad DUoS tariff arrangements for the category of customers.</li> </ul> <p>Importantly it is the FRMP/Retailer who must pay these charges whichever way they are structured. The LNSP in all cases recovers the cost from the FRMP.</p>	M	Remove the clause (or rewrite it to make it clear that the Distributor cannot recover from the FRMP more than the regulated charge for the standard metering services, although we consider that this is not required)
7.4.1 & 7.4.1A	<p>The terminology in the Rules should support and reinforce the relative functions and roles of the Responsible Person and the service providers it has engaged (even though "legally" the difference may be not recognised). Generally the service provider has the action and the Responsible Person has the role and responsibility of ensuring the service provider carries out that action.</p>	M	Change wording in Clauses with inappropriate terminology.
	<p>The heading for these Clauses should read Role of the MP or Role of the MDP rather than "responsibility"</p>	M	Change wording
7.4.1 (b)	<p>SP AusNet cannot understand why the specific role of the MP for security controls is detailed here. The responsibility for security rests with the Responsible Person as established by 7.2.5(d) (3) (with revised wording as suggested by SP AusNet). The role of the MP is to meet the Metering Installation requirements of the Rules and the Metrology Procedure including security provisions.</p>	M	Remove Clause

7.4.1A (b)	SP AusNet cannot understand why the specific role of the MDP for security controls is detailed here. The responsibility for security rests with the Responsible Person is established by 7.2.5(g) which places the responsibility for all aspects of MDP services on the Responsible Person. The role of the MDP is to meet the Metering Data Service requirements of the Rules and the Metrology Procedure including security provisions.	M	Remove Clause
7.4.2 (bb) and (bc)	<p>In 7.4.2 (bb) there is a very open statement on what the accreditation process can impose as requirements. Hence whilst the remainder of the Rules imposes a number of specific obligations on the MP, the accreditation process can extend these by "...any requirements established by AEMO .."</p> <p>Clause (bc) provides a list of possible additional requirements but makes it clear that there could be others. The requirements included are:</p> <ul style="list-style-type: none"> <li>○ requirements relating to cooperation with NEMMCO and any person engaged by NEMMCO to operate any relevant agency metering database,</li> <li>○ the confidentiality of information collected by Metering Providers,</li> <li>○ the resolution of disputes between NEMMCO and Metering Providers,</li> <li>○ the access of NEMMCO to and the inspection and audit by NEMMCO of any equipment or database maintained by Metering Providers,</li> <li>○ the insurance which must be taken out by or on behalf of Metering Providers,</li> <li>○ subcontracting by Metering Providers,</li> <li>○ the software and systems that are used by Metering Providers,</li> </ul>	H	The detailing of the accreditation requirements should clearly relate to Rules and Metrology Procedure obligations and these Rules clauses should be changed to make this the basis.

	<ul style="list-style-type: none"> <li>○ retention of quality systems,</li> <li>○ the ownership of intellectual property that is developed or used by Metering Providers, and</li> <li>○ the delivery up to NEMMCO of data, works, material and other property in the event of the deregistration of a Metering Provider..</li> </ul> <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. They should not be left to the accreditation guidelines to establish. If they are not obligations then they should be removed. .</p>		
7.4.2A (d) and (c)	<p>In 7.4.2A (d) there is a very open statement on what the accreditation process can impose as requirements. Hence whilst the remainder of the Rules imposes a number of specific obligations on the MDP, the accreditation process can extend these by "...any requirements established by AEMO .."</p> <p>Clause (c) provides a list of possible additional requirements but makes it clear that there could be others. The requirement included are:</p> <ul style="list-style-type: none"> <li>○ requirements relating to cooperation with NEMMCO and any person engaged by NEMMCO to operate any relevant agency metering database,</li> <li>○ the confidentiality of information collected by Metering Data Providers,</li> <li>○ the resolution of disputes between NEMMCO and Metering Data Providers,</li> <li>○ the access of NEMMCO to and the inspection and audit by NEMMCO of any equipment or database maintained by Metering Data Providers,</li> <li>○ the insurance which must be taken out by or on behalf of Metering Data Providers,</li> </ul>	H	The detailing of the accreditation requirements should clearly relate to Rules and Metrology Procedure obligations and these Rules clauses should be changed to make this the basis.

	<ul style="list-style-type: none"> <li>○ subcontracting by Metering Data Providers,</li> <li>○ the software and systems that are used by Metering Data Providers,</li> <li>○ the retention of quality systems,</li> <li>○ the ownership of intellectual property that is developed or used by Metering Data Providers, and</li> <li>○ the delivery up to NEMMCO of data, works, material and other property in the event of the deregistration of a Metering Data Provider.</li> </ul> <p>If these involve firm requirements and obligations on MDPs then these should have high level obligations in the Rules and more detailed requirements in the Metrology Procedure. They should not be left to the accreditation guidelines to establish.</p>		
7.4.3 (b)	As noted in SP AusNet comments on Clause 7.4.2 and 7.4.2A, it is of concern that a service provider may be subject to deregistration actions based on a requirement which is not contained in the regulatory instruments but rather “expressed to apply to” service providers by AEMO.	H	Remove this undefined basis for deregistration.
7.4.3	<p>SP AusNet have three major concerns regarding the process as defined in the Rules:</p> <p>1 it does not formally involve the Responsible Person in the deregistration process. 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>	H	Revise the process to take account of the concerns raised.

	<p>Given that there is no service provider of last resort concept the Responsible Person may need to be given dispensation for a period after a deregistration.</p> <p>2 There is no provision for the service provider to dispute the AEMO assessment of the breach and/or the severity of the AEMO action. 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. In (b) lead paragraph it is correctly stated that AEMO would have “reasonably identified” that the service provider “may have breached the provision of the .....” We would assume that this would remain a suspected breach until the service provider admits to the breach or the review of the service provider is carried out.</p> <p>3 the concept of materiality and intent should be introduced into the process to more formally recognise that the AEMO considerations in (c) must take these into account when determining the review outcome actions.</p>		
7.4.3 (d)	<p>The concept of acting unethically is difficult to reconcile with the process as the concept of the service provider “remains in breach” would generally not be applicable, and the process presumably would go straight to the review.</p>	M	Revise wording.
7.5.1	<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 on AEMO’s behalf. This however is generally to be put aside</p>	H	Confirmation of the approach regarding responsibility for the Meter Register is required.

	<p>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>		
7.6.2 (b)	<p>SP AusNet consider that this clause would be better handled by integration with Clause 7.9.5 which deals with data errors found in tests and audits.</p> <p>Data corrections must be made by the MDP (under their arrangements with the Responsible Person) and this is handled in Clause 7.9.5 (refer SP AusNet comments on this Clause). As stated in Clause 7.9.5 depending on timing relative to “current” settlement AEMO may do a data correction in the settlement ready data and then notify the MDP to correct the metering data.</p>	H	Substantially remove this clause and reference 7.9.5 for the data correction details. If not then a number of aspects of 7.9.5 regarding data correction must be added to this Clause.
7.6.3	Heading is not appropriate	L	<p>Heading should be:</p> <p>Audits of metering data</p>
7.6.3	In the current Chapter 7 this clause regarding the auditing of metering installations includes the auditing of the metering	H	There would appear to be a need for a metering data service database / MDP audit equivalent of this Clause.

	<p>installation database.</p> <p>Under this proposed Rule change the metering installation data base (now the metering data service database ) is no longer part of the metering installation. This clause which compares data in the metering installation with the metering database no longer directly provides an audit obligation and commitment for the audit of the metering data service database ie the comparison of the metering data service database with the metering database and/or the metering installation (ie the energy data).</p> <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>		
7.6.3	<p>Although SP AusNet have not considered this matter in detail there would appear to be a need for the Responsible Person to be involved in a number of aspects of this clause with respect to access and security, and to be given the notice of the audit.</p>	H	<p>Consideration of the Responsible Person role and subsequent wording changes.</p>
7.7	<p>Heading is not appropriate</p>	L	<p>Heading should be:</p> <p>Security of Metering Installations and <a href="#">Energy</a> Data</p>
7.8.4 (c)	<p>More clarity is required with respect to the obligation of the Responsible Person to “advise AEMO of the variation” caused by an alteration to metering data as a result of an onsite test. Is the expectation that specific and direct notification be given or is the advise in this case effectively given by the sending to AEMO of the corrected data?</p> <p>SP AusNet consider that in general the latter is appropriate.</p>	M	<p>Make the intention clear.</p>

7.9.1	<p>If AEMO are to use agents to establish agency metering databases then there would appear to be a requirement under the new MDP structure to establish obligations on AEMO as to who they can use as agents.</p> <p>Whilst under the current model it is notionally the MDA who produces “settlement ready data” it is actually AEMO directly that finally validates the data as ready for settlements (and substitutes where the MDA has made an error).</p> <p>Under the new model if AEMO are wanting to keep the option of using agents then that agent(s) would be doing the “final” settlement data provision. There would appear to be a requirement for the criteria for the agent carrying out this critical aspect of the data process to be controlled under the Rules.</p> <p>Is it sufficient that these agent(s) are accredited MDPs or are there additional criteria?</p>	H	<p>There should be words in this Clause which provides at least for the metering database agent to be an accredited MDP, and maybe have additional criteria applied.</p>
7.9.1 (g)	<p>This clause specifies the requirements for on line storage and archiving of metering data in the metering database. The Clause does not appear to place an obligation on AEMO to store and/or archive the settlements ready data.</p>	H	<p>Is the retention of the settlement ready data used by AEMO for each settlement a requirement? If so the obligation must be added to the Rules.</p>
7.9.1 (i)	<p>The redefining of where settlements ready data is generated and stored has further confused the situation regarding what specifically is settlements ready data and therefore whether under the new definition it is readily available to the DNSP to carry out its billing as required by Rules Clause 6.20.1.</p> <p>We have gained an understanding from the new wording and from the Schedule 7.1 diagram that settlements ready data will now only be available within AEMOs metering database. We understand that in general the MDP will have only their</p>	H	<p>Specific wording is required in Chapter 7 (and/or in Chapter 6) to ensure the DNSP billing data obligations are clear.</p>

	<p>Metering Data Service Database and not an agency component of the metering database. They will not have access directly to the settlements ready data, and hence will not be able to easily fulfil the requirements of Clause 6.20.1.</p> <p>Notionally the data in the Metering Data Service Database and the metering database will converge as the MDP will before final settlement be delivering metering data which reflects any substitutes made by AEMO in creating early settlement versions of the settlements ready data. This is the consequence of the feedback given by AEMO under the processes in Clause 7.9.4.</p>		
7.9.1(j)	<p>Whilst it is suggested here that AEMO can get data directly from the Metering Installation for settlements, the removal of Clause 7.8.2(e) has removed their rights to meter passwords. They will no longer be able to directly access meters.</p>	M	Remove clause or add details of how AEMO will do this and the necessary obligations for it to happen.
7.9.4 (d)	<p>This reads:</p> <p>(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.....</p>	M	Add words for clarity
7.9.4 (f)	<p>The use of the term “best” endeavours is inappropriate here. The cost of fulfilling a best endeavours obligation could be prohibitive and would be a barrier to service provider competition. This should be “reasonable” endeavours.</p>	H	Revise wording.
7.9.5	<p>The testing under 7.6 can be carried out by AEMO or the Responsible Person. As stated in the Rules the primary responsibility is with the Responsible Person, and AEMO only carry out the test if the Responsible Person does not</p>	M	Add Responsible Person to this Clause and modify the wording in all the Clauses to reflect the process outlined in the SP AusNet scenario.

	<p>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"> <li>• if the error is &gt; 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.</li> <li>• If the error is &lt; 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 the AEMO and Participants.</li> </ul> <p>AEMO would only independently substitute under the scenario in 7.9.4 (d).</p>		
7.9.5 (c)	Under (d) it will be the MDP undertaking the substitution however under (c) AEMO have the role.	M	<p>Change the Clause to read:</p> <p>If any substitution is required under clause 7.9.5(b), then AEMO must provide substituted metering data to effect a correction for that error in respect of the period since the error was deemed to have occurred.</p>
7.7	Heading is not appropriate	L	<p>Heading should be:</p> <p>Metering Data <b>Service</b> Arrangements</p>
7.11.1	Heading is not appropriate. Although notionally the clauses should stand alone without the heading, in this case getting	H	Heading should be:

	the correct understanding of the context of the clause is important.		<u>Interval</u> Metering Data
7.11.1	<p>The changes to this Clause are for improvement of clarity. This is an important Clause regarding establishing AEMO's fundamental data requirements, and could be critical in any rewrite to define data requirements for Smart meters.</p> <p>SP AusNet however consider that the clause is still unclear as detailed below and propose the wording changes as outlined. 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</p>	H	
7.11.1 (a)	<p>SP AusNet's understanding of this Clause is that it is meant to be stating that where the Metering Installation has interval data and is remotely read (ie a t4) that this interval data must be collected. This is subject to clause 7.3.4(g) as this Clause allows it to be remote read but t5 and it hence is covered in 7.11.1 (d).</p> <p>This Clause is not subject to (b) and (c), as (a) applies irrespective of (b) or (c).</p>	H	<p>Better wording would be:</p> <p>Subject to 7.3.4(g) AEMO requires delivery of interval metering data for all trading intervals where the metering installation has interval data capability and has the capability for remote acquisition of this data</p> <p>SP AusNet consider for clarity a similar clause should be associated with the non remotely read interval meters. Refer comments on 7.11.1 (d) below.</p>
7.11.1 (b)	<p>This is meant to state that where a Metering Installation has interval data capability and is remotely read and AEMO requires actual metering data for meeting its market obligations that .....</p> <p>.</p>	H	<p>Better wording would be:</p> <p>Where <u>an interval meter has the capability for remote acquisition and</u> AEMO requires actual interval metering data to ensure compliance with Chapter 3, the metering data required under paragraph (a) must be:</p>
7.11.1 (c)	This is meant to state that where a Metering Installation has	H	Better wording would be:

	interval data capability and is remotely read and AEMO does not require actual metering data immediately for meeting its market obligations that .....		Where <u>an interval meter has the capability for remote acquisition and</u> AEMO does not require actual interval metering data to ensure compliance with Chapter 3, the metering data required under paragraph (a) must be:
7.11.1 (d) New Clause	<p>SP AusNet consider for clarity a similar clause to 7.11.1 (a) which is applicable to remotely read interval meters should be included above the current clause (d) which is associated with the non remotely read interval meters (t5 meters). By following a similar drafting approach the similarities and difference between meters covered by (a) and (b) or (c), and meters covered by (d), will be clearer.</p> <p>This would make reference to 7.2.5(g) which defines the obligations associated with the type 5 accumulation boundary where interval data will not be delivered.</p>	H	<p>Wording would be:</p> <p>Subject to 7.2.5(g) AEMO requires delivery of interval metering data for all trading intervals where the metering installation has interval data capability and does not have capability for remote acquisition of this data.</p>
7.11.1 (e) was (d)	<p>This is meant to state that where a Metering Installation has interval data capability and is manually read that ....</p> <p>Wording should better align with that in (b) and (c).</p>	H	<p>Better wording would be:</p> <p>Where the metering installation does not have the capability for remote acquisition of <del>actual</del> metering data, <u>the metering data is required under paragraph (d) [new para] must be:</u></p>
7.11.1 (b)	<p>It is unclear why interval meters covered by this Clause should not be in accordance with the performance standards specified in the metrology procedure as other the meters covered by (c) and (d)?</p> <p>.</p>	M	Include same clause (eg (c)(4)) here.
7.11.1 (b)(2), (c)(2) and (d) (2)	In the General Section Item 2 of this Submission SP AusNet has argued that the service level requirements / procedure should not include obligations beyond those defined in the Metrology Procedure. We consider therefore that in these Clauses the reference to “the relevant service level procedure” should not be included.	H	Delete the reference to the service level document

7.11.1 (b)(4), (c)(3) and (d) (3)	Reference to the specific clauses in the Rules which define what is in the Metrology Procedure is not required. For consistency with other references this should just be to the Metrology Procedure. Eg there is no reference in (b)(2) regarding timing to 7.14.1 (c)(4)(ii) which states that the Metrology Procedure must define timing requirements.	M	Delete the reference to specific Rules clause
7.11.1(b)	It is unclear what would be the basis of different requirements which might be "otherwise agreed between AEMO and the Responsible Person". This appears to be a very undefined and unregulated approach to the data rules for these meters.  What is the expectation here? What other requirements might be considered? What is the obligation on the Responsible Person to agree?	H	Clarify the scope of the other data requirements AEMO might want and what the process to reach agreement would be.
7.11.2	Heading is not appropriate	L	Heading should be:  Metering Data <u>Service Role</u>
7.11.2 (a) (1)	Whilst this is not meant to be an exhaustive list the full range of meter reading options should be included.	M	Add to the clause:  collecting metering data including collecting metering data by remote acquisition; <u>by manual reading or by calculation.</u>
7.11.2 (a) (1)	Minimum service requirements are not to provide "access" to the MDS database but rather to deliver data  Further the MDP will only have a portion of the metering register in their MDS database and this is all they can be obliged to deliver.	H	Better wording would be:  <u>The delivery of providing access to</u> metering data, NMI Standing Data or information from the <u>portion of the metering register that the MDP must have in the metering data service database</u> for a metering installation to persons entitled to receive data in

			accordance with clause 7.7;
7.11.1 (b)	<p>Refer comments in this submission on 7.3.1(c) and (g).</p> <p>SP AusNet consider that this Clause must be redrafted to incorporate a number of the concepts in the equivalent MP clauses 7.3.1(c) and (g).</p> <p>It is important that the responsibilities with respect to additional services to be potentially supplied from an Responsible Person's meter installation are clear.</p>	H	<p>Replace (b) with the wording which is based as shown on 7.3.1(c) :</p> <p>(b) Either a Local Network Service Provider or a Market Participant may, with the agreement of the responsible person (which cannot be unreasonably withheld), arrange for <u>provision of data services a metering installation to contain features</u> in addition to, or which enhance, <u>data services the features</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 a metering installation is used for purposes</u> in addition to <u>those specified in paragraph (a) are provided the provision of metering data to AEMO and market participants</u> then the Responsible Person when agreeing to the additional <u>data services purpose</u> as required by (b) must use reasonable endeavours to ensure that :</p> <p>(1) that <u>additional service use</u> must not cause an infringement of the requirements of the Rules or other obligation which the Responsible Person must fulfil <u>for data services with the Metering Installation</u> ;</p> <p>(2) the responsible person must co-ordinate with the persons who use <u>these additional data services the metering installation for such other purposes</u></p>
7.11.3 (a) and (c)	<p>It is SP AusNet's view that the metering data services database is a single "conceptual" database which can consist of one physical database or a number of linked databases (similar to the current concept of the AEMO metering database being spread over a number of MDAs).</p>	H	<p><u>(a) Subject to (c) Metering Data Providers must retain metering data in the metering data services database for all relevant metering installations, ensure the metering data services database contains metering data that is retained:</u></p>

	Hence all “categories” of metering data will be stored in the metering data services database. The concept of some data being stored “separately from the metering data service database” should be removed.  Rewording of (a) should also remove the concept that the MDP “ensures” to the MDP “does”		(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.  <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>
7.11.3 (a)	Rewording of (a) should also remove the concept that the MDP “ensures” to the MDP “does”	M	<u>(1) metering data</u> in the form in which it was collected; <u>and</u> <u>(2) records</u> of each adjustment or substitution to the metering data
7.11.3 (c)	The concept of data being “in the form in which it was collected” is not very clear. Although SP AusNet hopefully is across the concept we are unclear how this should be captured in words to better define the obligation.	H	The concept of ‘in the form in which it was collected’ must be defined.
7.11.3 (d)	The reference to the delivery requirements should reference the Metrology Procedure. The Rules 7.14.1(c) state that the Metrology Procedure must have this detail.	H	Change wording to Metrology Procedure not service level procedure
7.11.3 (f)	SP AusNet are 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 understanding of the word.	H	Wording should be changed to reflect practise. If AEMO expects specific notification “transaction” the, this should be made clearer including the circumstances in which this will be required.
7.11.3 (g)	Under Clause 7.9.4 (d) AEMO (or their agents) can edit metering data in their production of settlements ready data.	M	Reword as follows: Metering data may only be edited by a Metering Data Provider <u>except in the production of settlements ready data by AEMO under Clause 7.9.4 (d)</u>

7.11.3 (i)	Minimum service requirements are not to provide "access" to the MDS database but rather to deliver data	H	Based on wording of (d):  Metering Data Providers must maintain delivery facilities in accordance with the Metrology Procedure in order to deliver metering data from the metering data services database to the Market Participants and Network Service Providers who are entitled to this data
7.11.3 (j)	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.	M	Delete Clause.
7.11.3 (k)	Refer to SP AusNet submission on Rule 7.2.5 (g) (3). We consider that this is not appropriate for mass meters and should be matched with an obligation on MPs to responsible when requested by the RP.	H	The clause should either be deleted or limited to types 1-4 customers who are above 160MWhpa.
7.11.5 (b)	SP AusNet found this Clause confusing as it does not align with the usual process for either type 6 or for type 7 meters.  The type 6 the trading interval data is not determined in the metering data service database by the MDP but rather in the metering database by AEMO.  The type 7 data is determined in trading intervals in the metering data service database by the MDP and unless there is a Metrology Procedure change cannot be determined in non interval form and then converted by profiling by AEMO.	M	Revise wording to align with Metrology Procedure and current practise. SP AusNet suggest a separate Clause for each of the two meter types.
7.12 (a), (e) and (f)(1)	Reword to give the MP the role not the RP.	M	Eg wording of 7.12 (a):

	The AEMO explanation for the changes to 7.12 recognise in the 4 <sup>th</sup> dot point that where appropriate the Rules Clause should place the “operational responsibilities directly on the MP and MDP, rather than the Responsible Person” this supporting the suggested SP AusNet rewording both here and elsewhere through the Rules.		The Metering Provider responsible person must <u>set the times of</u> <del>ensure that the</del> clocks of all metering installations <del>with are</del> referenced to Eastern Standard Time and maintain <u>the time</u> to a standard of accuracy in accordance with schedule 7.2 relevant to the load through the metering connection point when installing, testing and maintaining metering installations.
7.13 (g), (h)	It makes no sense to leave this 30 June 2009 obligation in the Rules. It is suggested that a new date needs to be set for the Ministers’ review. A possible date is late 2012 when the MCE has committed to a review of Smart meter rollouts and trials to that date and to the determination of the approach for ensuring broader national rollout of Smart meters.	M	Change date and change the basis of the review to include ongoing metering approach including adoption of smart meters.
7.14.1 (c) (4) (ii)	This subclause does not align with the new role definitions nor recognise data delivery to Participants.	M	Reword as follows:  the timeframe obligations for the extraction or delivery of metering data from <u>the metering data service database</u> <del>a metering installation</del> for the purpose of settlements and <u>and billing</u> ; and
7.14.2 (b) and (c) Note.	The Note between (b) and (c) is for actions before 1 Jan 2009 and can be deleted.	L	Delete Note.
7.14.3	Heading is not appropriate	L	Heading should be:  Additional <u>Metrology Procedure</u> matters
7.14.4	As stated in General Section Item 2 of this submission there is a need for this Rules change process to consider what is the most appropriate structure for the national metrology documents. We consider that this review should consider that change process not only for the Metrology Procedure but the other procedures referenced in the Rules and	H	Review the procedures change process and standardise and rationalise this across all Rules nominated procedures.

	standardise and rationalise the change process.		
S7.2.1(b)	It is unclear whether this Clause is a “special” case of the change process in 7.3.1(c) (as further defined by 7.3.1(g))? Does this require agreement of the Responsible Person as per 7.3.1(c) rather being subject to a “requirement”. To whom is the request for above minimum quality installation get addressed to Responsible Person or the MP as per 7.3.1(c)?	M	Make approach consistent with 7.3.1 (c).
<b>Glossary</b>			
Metering Data Services	Although the metering register is a AEMO responsibility it is not directly held by AEMO but rather only partially held by AEMO with the remainder held by the MP and MDP. The MDP does not hold the whole metering register and this should be recognised in this definition..	M	<b>metering data services</b> The services that involve the collection, processing, storage and delivery of <i>metering data</i> and the management of <u>relevant</u> <i>NMI Standing Data</i> and <u>relevant</u> information from the <i>metering register</i> in accordance with the <i>Rules</i> .
Metering Data Services Database	Refer to comments above on the metering data services definition	M	<b>metering data services database</b> The database established and maintained by the <i>Metering Data Provider</i> that holds the <i>metering data</i> , <u>relevant</u> <i>NMI Standing Data</i> and <u>relevant</u> information from the <i>metering register</i> relating to each <i>metering installation</i> for which the <i>responsible person</i> has engaged the <i>Metering Data Provider</i> to provide <i>metering data services</i> .
Service Level Procedures	If the service level procedure remains in the Rules proposal, then consistent with the views expressed in General Item 2 of this submission it should be a single concise procedure rather than procedures.	H	<b>service level procedures</b> The procedures established under the <i>Rules consultation procedures</i> by <i>NEMMCO</i> in accordance with clause 7.2.9.
Telecommunications network	Refer to SP AusNet comments on Rule 7.2.5 (d) (4).  The performance and the accreditation/audit processes for	H	Add wording in body of Chapter 7 regarding performance assurance for the telecommunication network

	<p>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>		
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