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Lodged online: [www.aemc.gov.au](http://www.aemc.gov.au)

**Consultation Paper on Specific Issues –  
Provision of Metering Data Services and Clarification of Existing Metrology Requirements  
Rule 2010**

This submission has been prepared by Jemena on behalf of Jemena Electricity Networks (Vic) Ltd (**JEN**). JEN appreciates this opportunity to provide comments on the Australian Energy Market Commission (**AEMC**) Consultation Paper on Specific Issues (Provision of Metering Data Services and Clarification of Existing Metrology Requirements Rule 2010) (**the Rule Change**).

The Rule Change consultation, initiated by the Australian Energy Market Operator (**AEMO**), presents the AEMC's current thinking on the policy position to be adopted in relation to two separate yet related issues:

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

The AEMC is seeking stakeholder views on the policy position adopted and its proposed articulation in the draft Rule.

JEN generally supports the intention of the Rule Change but has concerns about some aspects of the drafting. These concerns as well as JEN's comments on the AEMC policy position are outlined below.

**Responsibility framework for metering data services**

JEN supports responsibility for the provision of metering data services be split between the responsible person (**RP**) and AEMO, depending on the complexity of the connection. This would involve:

- the RP being responsible for normal connections
- AEMO being responsible for boundary/complex connections

## Arrangements for complex connection points

JEN supports AEMO keeping its power to nominate the meter data provider and responsibility for metering data services for transmission and complex connections. JEN finds the AEMC proposed drafting confusing and would welcome a table listing the party responsible for metering data services by connection type being included in the Final Determination. This could be similar to the Table 2.1 of the Rule Change consultation paper and would aid understanding of the precise intent of the proposed drafting amendments.

Some specific comments that JEN has on the drafting are included below in Table 1.

**Table 1 – Specific comments on proposed drafting amendments**

Clause	Comment
7.2.1A	<p>Current drafting says the Market Participant may choose to be a RP and select a metering provider and a metering data provider.</p> <p>The drafting should be amended to require the Market Participant to select the TNSP to be the RP for all transmission connection points. This is because JEN considers the TNSP and AEMO should always be the service providers for transmission connections.</p>
7.2.1A(b)(2)(A)-(E)	<p>These clauses should be deleted. AEMO already has the power to make and amend procedures, making these clauses unnecessary and confusing.</p>
7.2.1A(d)(1)	<p>JEN would find it useful if the special site and technology related conditions referred to in this clause were outlined. The clause should be amended to oblige AEMO to:</p> <ul style="list-style-type: none"><li>• Publish a list of the special sites and technology related conditions (by way of examples or criteria)</li><li>• Notify the Financially Responsible Market Participant (FRMP) when AEMO becomes aware these conditions are present.</li></ul>
7.2.1(A)(e) and (f)	<p>These clauses should be deleted. The drafting in (d) is sufficient.</p>
7.2.5(h)	<p>This clause should be deleted.</p> <p>Current drafting places an obligation on the RP to liaise with AEMO before engaging a metering service provider for all metering installations. This is both impractical and onerous.</p> <p>Should the drafting suggested above for 7.2.1A(d)(1) be adopted, making the criteria for special sites and technology related conditions clear, then the intent of this clause is satisfied.</p>
7.2.5(i)-(k)	<p>These clauses should be deleted. The clauses are redundant with consideration to 7.2.5(g) and 7.2.4.</p>

If you would like to discuss this submission please do not hesitate to contact me on (02) 94551532 or email: [danielle.beinart@jemena.com.au](mailto:danielle.beinart@jemena.com.au).

Yours sincerely

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