



CitiPower Pty  
ACN 064 651 056  
www.citipower.com.au

Head Office: 40 Market Street Melbourne Victoria  
Telephone: (03) 9683 4444 Facsimile: (03) 9683 4499 DX 433 Melbourne  
Postal address: Locked Bag 14090 Melbourne Victoria 8001 Australia



Powercor Australia Ltd  
ACN 064 651 109  
www.powercor.com.au

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Dr John Tamblyn  
Chairman  
Australian Energy Market Commission  
Level 16, 1 Margaret Street  
Sydney NSW 2000

Email: [submissions@aemc.gov.au](mailto:submissions@aemc.gov.au)

Dear Dr Tamblyn

### Consultation Paper

#### **National Electricity Amendment (Provision of Metering Data Services and Clarification of Existing Metrology Requirements) Rule 2009**

Thank you for the opportunity to comment on the Rule Change proposals put forward by AEMO (previously NEMMCO) and released for consultation as the *National Electricity Amendment (Provision of Metering Data Services and Clarification of Existing Metrology Requirements) Rule 2009*

CitiPower and Powercor Australia (Powercor) are Victorian electricity distributors who are registered by AEMO as Network Service Providers and will be directly affected by the outcomes arising from this proposal.

CitiPower and Powercor support the general intention of the proposed Rule changes however; there are a number of concerns about the details of the proposal which are set out in the attached table for your consideration.

Please do not hesitate to give me a call on (03) 9683 42982 or email to [rherrmann@powercor.com.au](mailto:rherrmann@powercor.com.au) if you require any further information in relation to this matter.

Yours sincerely

Rolf Herrmann  
Manager Regulation

## Consultation Paper

### National Electricity Amendment (Provision of Metering Data Services and Clarification of Existing Metrology Requirements) Rule 2009

7.2.1(5)	<p>This clause refers to “procedures authorised under the Rules” which creates uncertainty about exactly which procedures set out the responsibilities of the Responsible Person. Presumably it is intended that this clause would require the Responsible Person to comply with the proposed Service Level Procedures in which this procedure should be directly specified. Please note however, that CitiPower and Powercor do not believe a separate Service Level procedure is warranted, any necessary service levels should be included in the Metrology Procedure making the addition of 7.2.1(a)(5) unnecessary.</p>
7.2.5(ab)	<p>This clause allows AEMO to nominate the Metering Data Provider for certain connection points. It is not clear why this power is necessary.</p>
7.2.5	<p>Clause 7.2.5 deals with the role of the Responsible Person.</p> <p>This provision would be enhanced if it included an express provision that the replacement or alteration of any metering installation be subject to the reasonable requirements of the LNSP. This will become increasingly important as metering infrastructure becomes more integrated into operational aspects of the Distribution system.</p> <p>This could be achieved by adding an extra provision 7.2.5(d)(10) along the lines of:</p> <p>“ensure that the reasonable requirements of the LNSP will be met before arranging for the replacement or alteration of a metering installation”</p>
7.2.5 (d) (1), (d) (2) and (g) (1)	<p>The clause 7.2.5 (d) (1), (d) (2) and (g) (1) make a generic reference to “procedures authorised under the Rules” in conjunction with the specific reference to “metrology procedure”. This introduces uncertainty as to which procedures are required. It is more precise to specifically identify the relevant procedure to avoid this uncertainty.</p> <p>Consider deleting the words “and procedures authorised under the Rules” where they have been inserted in clauses 7.2.5 (d) (1), (d) (2) and (g) (1)</p>
7.2.5 (g) (3)	<p>This clause requires the responsible person to arrange the provision of metering data to the metering data provider if remote acquisition becomes unavailable.</p> <p>This requirement would necessarily require the manual reading of the meters which becomes impractical if a very large number of meters were involved.</p> <p>The clause should either be deleted or at the very least be amended to provide the requirement that the responsible person use “reasonable endeavours” to arrange the provision of data to the metering data</p>

	provider.
7.2.8 (g)	<p>This clause allows AEMO to de-register a Metering Provider or Metering Data Provider for any breaches of the procedures.</p> <p>Such a strong action should not be available to AEMO unless the breaches are material.</p> <p>Also, AEMO should be obliged to give reasonable notice of such an action to the Responsible Person</p>
7.2.9	<p>Establishing Service Level procedures separate from the Metrology Procedure is likely to cause significant confusion and overlap because the Metrology Procedure already provides requirements for service levels, for example time frame obligations and performance standards.</p> <p>Consider integrating any service level procedure required into the Metrology Procedure.</p>
7.2.9 (c) (2)	<p>Service Level Procedures should be restricted to specifying output measures, not the systems and processes used by participants. Clause 7.9.2(c)(2) should be deleted.</p>
7.2.9 (c) (2)	<p>This clause refers to “delivery” and “allow access to” metering data in an ambiguous way. It would be clearer if the clause provided “(4) the data formats that must be used for the exchange of metering data.</p>
7.3.7	<p>Clause 7.3.7 deals with metering malfunctions and it is proposed that the provision be expanded from “malfunction” to “an outage or malfunction”.</p> <p>Outage is a defined term under the Rules as “full or partial unavailability of equipment” which in the context of metering would seem to be adequately and more clearly covered by “malfunction.”</p> <p>To avoid confusion about what is intended; delete the word “outage” where it has been introduced.</p>
7.4.2	<p>There is a circular reference between clauses 7.4.2(bb) and (bc)</p> <p>Any compliance should be with respect to procedures established under the Rules and should not be left open to “any requirements established by AEMO.”</p> <p>Consider:</p> <ul style="list-style-type: none"> <li>• deleting 7.4.2(bc) entirely and</li> <li>• deleting the words “and with any requirements established by AEMO under paragraph (bc), that are expressed to apply to metering providers.” from clause 7.4.2(bb)</li> </ul>
7.4.2A (d)	<p>The requirements specified in clause 7.4.2A(e) should be subject to the Rule consultation procedures.</p>

7.4.2A (e)	<p>AEMO should not prescribe the software and systems used by Metering Data Providers and they should not expect to assume ownership rights over intellectual property through the operation of the Rules.</p> <p>Consider the following drafting amendment.</p> <p>(e) The requirements referred to in paragraph (d) may include, among other things, requirements relating to cooperation with AEMO and any person engaged by AEMO to operate any relevant agency metering database, the confidentiality of information collected by Metering Data Providers, the resolution of disputes between AEMO and Metering Data Providers, the access of AEMO to and the inspection and audit by AEMO of any equipment or database maintained by Metering Data Providers, the insurance which must be taken out by or on behalf of Metering Data Providers, subcontracting by Metering Data Providers, <del>the software and systems that are used by Metering Data Providers</del>, the retention of quality systems, <del>the ownership of intellectual property that is developed or used by Metering Data Providers</del>, and the delivery up to AEMO of data, works, material and other property in the event of the deregistration of a Metering Data Provider.</p>
7.4.3	<p>This provision deals with the de-registration of metering providers and metering data providers in the event of breaches of the provisions of the Rules or procedures. It would be appropriate to restrict such action to “material” breaches.</p> <p>Consider inserting the word “material” where appropriate.</p> <p>The de-registration process contemplates written notification to the Metering Provider and Metering Data Provider but has overlooked a similar notice to alert the Responsible Person to the issues.</p> <p>Consider including written notification to the Responsible Person.</p>
7.4.3(a)	<p>This clause requires AEMO to establish a “procedure” for de-registration of Metering Providers and Metering Data Providers. The necessary procedure seems to be adequately set out in the remaining provisions of 7.4.3 and it is not evident that a further procedure is required.</p>
7.4.3(b)	<p>The de-registration should only be available for material breaches of the Rules or procedures established under the Rules. The references to clause 7.4.2(bb) and 7.4.2A(d) should also be deleted</p>
7.4.3 (d)	<p>The word “may” is repeated unnecessarily.</p> <p>Consider amending the drafting to:</p> <p>If, in the reasonable opinion of AEMO, a Metering Provider or Metering Data Provider has acted in any way which is unethical, AEMO may in accordance with the process established under paragraph (a) <del>may</del> deregister that Metering Provider or Metering Data Provider .</p>

7.6.3(a)	<p>This clause refers to data held in the Registered Participants metering installation. It would be more accurate to refer to the Responsible Person's metering installation, or preferably to simply refer to the 'metering installation'.</p>
7.7(b)	<p>This provision deals with access to energy data "by persons referred to in paragraph (a)". Since paragraph (a) does not deal with energy data but metering data the words "by persons referred to in paragraph (a)" should be deleted. They are redundant in any event.</p>
7.7(g)	<p>This clause requires that the Metering Provider must provide access to the Metering Installation to facilitate the requirements of paragraphs (b) and clause 7.12(f)</p> <p>Clause (b) refers to "electronic access" and 7.12(f) refers to resetting the clock.</p> <p>In order to maintain adequate security of the metering installation the access provided by 7.7(g) should be restricted to "electronic access".</p> <p>Consider the insertion of the word "electronic" before the word "access".</p>
7.9.1(i)	<p>This clause is redundant and should be removed. Clause 6.20.1 deals adequately with how distribution service charges are determined.</p>
7.9.1 (j)	<p>This clause seeks to give AEMO unfettered power to obtain metering data directly from a metering installation.</p> <p>This is impractical.</p> <p>Also, this power is excessive and should be constrained to situations where AEMO has made every effort to obtain the data through normal channels before exercising a last resort power of this sort.</p> <p>Also the provision, which deals with obtaining metering data, seems to be located inappropriately in a section dealing with Metering Databases.</p>
7.9.4	<p>The operation of clause 7.9.4 is confusing and unclear.</p> <ul style="list-style-type: none"> <li>• (d) requires AEMO to substitute data</li> <li>• (e) requires AEMO to notify the Metering data provider</li> <li>• (f) requires the Metering Data provider to provide corrected metering data</li> </ul> <p>To avoid confusion caused by the data held in the Metering database and the metering data services data base being different, the data substituted by AEMO for settlement purposes should be regarded as interim data, not substituted data.</p> <p>Clause 7.9.4(f) requires the Metering Data Service Provider to use "best endeavours" which requires a very high level of endeavour which may not be economically justified. Consider replacing "best" with "reasonable".</p>

7.11.2(a)(6)	This provision requires the Metering Data Provider to provide access to NMI Standing Data and information from the metering register. This data is not under the control of the Metering Data Services Provider and it is not clear how these obligations can be met.
7.11.3	Clause 7.11.3 refers to specific techniques relating to type 7 metering installations which may not be applicable to all MDP's Consider restricting 7.11.3(b) to MDP's actually accredited to provide type 7 metering data.
7.11.3(h)	This provision includes "A metering data provider may only edit metering data". It is unclear what is contemplated by "edit" in this context, consider exchanging the word "edit" for "alter".
7.11.3(g)	This provision includes "Metering Data may only be edited by a Metering Data Provider". It is unclear what is contemplated by "edit" in this context, consider exchanging the word "edit" for "alter".
7.11.3(i)	Clause 7.11.3 (i) requires that the metering data services database must have the capacity for electronic access by Market Participants. This is inappropriate drafting. The key requirement is that relevant parties have appropriate access to the metering data, not the database. This is adequately covered by 7.11.3(d) and 7.11.3(i) should be deleted.
7.11.3(j)	The operation of this clause is unclear. AEMO accredits and registers the Metering Data Provider; it is unclear why a further approval of rules and protocols for the collection of data should be approved by AEMO.
7.11.3(k)	This clause seems to unnecessarily duplicate 7.2.5(g)(3) and should be deleted.
7.12(a)	The provision deals with the accuracy of clocks and has been amended from "load through the metering point" to "load through the connection point" This is problematic where a number of small customers have separate metering installations in relation to the same connection point, such as occurs at shopping centres or commercial high rise. This would mean the accuracy requirements for large customers would flow down to relatively small customers. Is this intended?
7.12(f)	See comments regarding 7.12(a) regarding the use of "connection point" instead of "metering point" in relation to this clause also.
7.14.1(c)(4)(ii)	This clause refers to the delivery of metering data from the "metering installation". Following the changes to the definition of metering installation this is no longer the case. The data should be from the metering data services database.
S7.2.6.1 (a) and (b)	The drafting has been amended to refer to "connection point" instead of "metering point"

	<p>These provisions are problematic in situations where there is more than one metering installation in relation to a connection point. For example, if there were two metering installations, one for 990GWh and the other for 10GWh, is it intended that the provision apply to both metering installations?</p>
S7.2.3 Item 4(4)	<p>S7.2.3 Item 4(4) previously provided for type 6 accumulated energy data to be transferred to a remote location. It is not clear why this provision has been deleted, there may be circumstances where it is necessary to transfer such data.</p>
Table S7.6.2	<p>The Rules provide for remotely reading type 5 and 6 meters in certain circumstances. (see clause 7.3.4 (f)). The remote acquisition of data should therefore be provided in S7.6.2 for metering types 5 and 6.</p> <p>e.g.</p> <p>Category 5D and/or 6D (for manual collection <u>and/ or remote acquisition</u>, processing and delivery of metering data</p>
S7.6.3(d)	<p>This provision requires licensed access to metering software, presupposing that a licence is required. The key issue is access to appropriate software, not whether or not a licence is required. Consider deleting the reference to “licensed”</p>

## Chapter 10

Definition	CitiPower and Powercor Comment
<ul style="list-style-type: none"> <li>• accumulated energy data</li> <li>• interval energy data</li> <li>• accumulated metering data</li> <li>• interval metering data</li> </ul>	<p>Under the current definitions:</p> <ul style="list-style-type: none"> <li>• the “energy data” (accumulated or interval) is the measurement taken by the meter and stored in the meter until collection.</li> <li>• the “metering data” (accumulated or interval) is the data after collection from the meter.</li> </ul> <p>This seems counter intuitive as it refers to the data as “metering data” after it is removed from the metering installation and “energy data” while it is in the metering installation.</p> <p>There is also an overlap created where the same data has two different names depending on where it is located. Presumably it is intended that the data read from the meter should be stored in the metering data services database, it would be more straight forward to require this directly. This would also then leave it clear that the “metering data” is processed data, not the raw readings from the meter.</p>
Telecommunications Network	<p>The definition of telecommunications network includes a requirement for approval by AEMO for networks, other than public networks, that are used for remote acquisition of data. Given that AEMO is no longer directly responsible for the collection of data from meters and is responsible for the accreditation and registration of meter providers and meter data service providers, it is unnecessary and inappropriate for AEMO to separately have an obligation to approve the telecommunications network.</p> <p>Consider the following amendment to the definition of telecommunications network:</p> <p style="padding-left: 40px;">A telecommunications network that provides access for public use or an alternate telecommunications network <del>that has been approved by AEMO</del> for the remote acquisition delivery of metering data.</p>
Metering Installation	The definition for “metering installation” includes a note with 4 items, two of them numbered 3.
metering data services	<p>This definition is unclear as it refers to information “from” the metering register, which is part of the metering database. Consider the following drafting amendment:</p> <p>The services that involve the collection, processing, storage and delivery of metering data and the management of NMI Standing Data and metering register information in accordance with the Rules.</p>
metering data services database	This definition includes the “metering register” which is also part of the “metering database”. Is it necessary to prescribe that the “metering register” should be duplicated in both the metering data base and the metering data services database?



remote acquisition	<p>The note at the end of the definition provides that remote acquisition may collect other than interval metering data. This is inconsistent with the first sentence of the definition which restricts remote acquisition to the acquisition of interval metering data from a metering installation.</p> <p>Also, the use of “interval metering data” in this definition is inappropriate since “interval metering data” is the data in the “metering data services database” after it has been collected. If it is intended to restrict remote acquisition to interval data, consider replacing “interval metering data” with “interval energy data” or, alternatively replace “interval metering data” with “data”.</p> <p>The word “the” is missing after the words “communications interface at” in the first paragraph.</p>
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