



# DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK

## METER CHURN PACKAGE

***Participant:*** AusNet Services

***Completion Date:*** 8 December 2014

# Table of Contents

<b>1. PROPOSED CHANGES</b> .....	<b>3</b>
A. PROPOSED CHANGES TO THE METER CHURN PACKAGE .....	3

## 1. Proposed Changes

- Meter Churn procedure for Financially Responsible Market Participants (New Document)
- SLP Metering Data Provider Services – Section 8 and Section 9
- SLP Metering Provider Services Category B for Metering Installation Types 1, 2, 3, 4, 5 and 6

**NOTE:** Below are two specific things requiring comment:

Effective date of implementation

Significant change to 8.1.6 (c) of the MDP SLP.

Other minor changes please refer to the combined response packs for more information.

Please include your comments in the 'Participant Comment' column below.

### A. Proposed Changes to the Meter Churn Package

Item	Description	Category	Participant Comments
<b>1</b>	<b>PROPOSED/ REQUESTED CHANGES</b>		
1.1	<p>During the feedback process for first stage consultation AEMO received comments regarding the implementation date of December 2014. Feedback received requested a September or November 2015 implementation date.</p> <p>Implementation dates were discussed at the MSWG on the 31st October 2014 with the most favourable date being November 2015 by the members of the MSWG.</p> <p>AEMO has provided 2 options:</p> <p>Implementation date of 30th September 2015 as per majority of the feedback from participants;</p> <p>Or</p> <p>Implementation date of November 2015 to align with a MSATS/B2B system release.</p>	<b>Procedure only</b>	AusNet Services supports Implementation date of November 2015 to align with a MSATS/B2B system release.

Item	Description	Category	Participant Comments
1.2	<p>MDP SLP</p> <p>Section 8</p> <p>8.1.6 (c) change to the clause</p> <p>(c) Where the <i>Metering Data Provider</i> is changing as a result of the <i>Meter Churn</i> and there is a delay in the change of the <i>Metering Data Provider</i> role in MSATS:</p> <p>i. the <i>Metering Data Provider</i> must make the data stream inactive in MSATS for the removed meter with an effective start date of the <i>Meter Churn</i> day.</p> <p><del>i. the old Metering Data Provider must provide substituted metering data in accordance with the metrology procedure: Part B with a quality flag of 'S' and a reason code of 37 (meter under churn) in the MDFF until the new Metering Data Provider becomes the Metering Data Provider in MSATS; and</del></p> <p><del>ii. the new Metering Data Provider, when it becomes the Metering Data Provider in MSATS, must provide actual metering data for the period of substitution in (c)(i) above.</del></p>	Procedure only	AusNet Services supports this proposed change.
	<b>MPB SLP</b>		
1.3	<p>4.12.1 Metering Installation Change Process</p> <p>There is a broad issue that the table of tasks 1-11 lacks clarity and formality.</p> <p>Tasks 3 and 4 require the current MPB to notify the current MDP/RP and wait 2 days for comment. We consider the following changes are made:</p> <p>Task 3. Notify Metering Data Provider and/or responsible person by <b>a written request to the relevant ROCL contact</b> <del>formal communication</del>, advising of the metering installation change (one business day).</p>	Procedure	<p>We seek ensure the MPB provides a written notification to the relevant ROCL contact.</p> <p>We suggest that AEMO further recognise that future meter contestability will greatly increase the volume of churn and the inclusion of a Service Order/SMP transaction may be</p>

Item	Description	Category	Participant Comments
			appropriate to manage this notification requirement.
1.4	<p>4.12.1 Metering Installation Change Process</p> <p>Tasks 5 and 6 do not make it clear what information is required and from whom. Suggest the meter churn arrangements clarify what information is required by whom. Otherwise the meter churn procedures will not efficiently cater for mass market volumes and meter providers will continue to bother an otherwise unrelated LNSP with information requests.</p> <p>Meter Provider obtains (where necessary):</p> <ol style="list-style-type: none"> <li>1. site information from MSATS via a NMI Discovery Type 2;</li> <li>2. security access information from the current Metering Provider; and</li> <li>3. customer contact details from the FRMP</li> </ol>	<b>Procedure (and enable access NMI Discovery Type 2 for MDPs)</b>	<p>Please provide a clarify and consider suggestion</p> <p>We suggest that AEMO further recognise that future meter contestability will greatly increase the volume of churn and this clarification is required all the more.</p>
1.5	<p>Suggest the following changes are made to 4.33.1, noting changes are in red:</p> <p>4.33.1 The Metering Provider must comply with the Rules and all relevant procedures under the Rules and the current:</p> <ol style="list-style-type: none"> <li>a) AS3000 Wiring Rules;</li> <li>b) <del>ACA Communications Cabling requirements (where applicable);</del> ACMA's Cabler Provider Rules (CPRs) requirements (where applicable); and</li> <li>c) jurisdictional and Network Service Provider requirements.</li> </ol>	<b>Procedure only</b>	<p>ACA Communications Cabling has been replaced by ACMA's Cabler Provider Rules (CPRs) requirements.</p> <p>Requiring MPBs and their contractors to abide by an irrelevant, superseded code does not meet the objectives of the MPB SLP and reflects badly on the industry. Not updating this redundant section is not an option. If the proposed changes are not agreed then section 4.33.1b) should be removed.</p>

Item	Description	Category	Participant Comments
	<b>MDP SLP</b>		
1.5	<p>Regarding section 9.5 AusNet Services recognises that telecommunications networks represent a critical part of every MDP's business. Therefore, it is appropriate for AEMO to subject telecommunications networks to the same rigours as applied to other MDP systems (and for that matter MPCs that remotely transfer data to backend systems). However, applying obligations on non-public telecommunications networks disproportionately burdens businesses with purpose built infrastructure when the same risks often apply to all telecommunications networks. Accordingly, there is a need to balance these obligations, and remove any heavy handed obligations.</p> <p><b>We recognise the NER requires AEMO to approve non-public telecommunications networks.</b> However these Rules were written when, dial-up modems supported by phone lines were commonly used for Type 1-4 meters. These phone lines were subject to over a hundred of telecommunications regulations guaranteeing minimum service levels and standards.</p> <p>Today, meters are supported by 3G and 4G wireless services offered by any number of telecommunications re-sellers and wholesale network providers. Even consumer protections that apply to individual customers of mobile data services do not apply to MDPs purchasing wholesale services arrangements (often known as M2M arrangements).</p> <p>Fundamentally, non-public telecommunications networks are now no different from wireless telecommunications products widely available to businesses in the public domain.</p> <p>As such, it is incumbent on every MDP business to negotiate adequate terms and conditions from any telecommunications company (including re-sellers who aggregate bandwidth). Many of the same conditions/risks apply equally to both public and non-public telecommunications networks. Each MDP must negotiate with their telecommunications provider (including Telstra) appropriate terms with regard to security arrangements (e.g. locking cabinets, encrypting VPN traffic), available bandwidth, service availability and disaster recovery. In regards to these aspects there is no difference</p>	<b>Procedure only</b>	Please consider the issue we have raised with the proposal, and amend the procedures as suggested.

Item	Description	Category	Participant Comments
	<p>between public and non-public telecommunication networks, and AEMO has no basis for needing to approve one but not the other.</p> <p>AusNet Services suggests this obligation applies to both public and non-public telecommunications networks</p>		
1.6	<p>AusNet Services considers time synchronisation is a meter issue and not a telecommunications issue. Telecommunications occur on a different network layer to the meter time synchronisation, which occurs through the application layer. An outage of the telecommunications network in no way results in a time synchronisation error in the meter. Further, RPs and MDPs are already subject to obligations to ensure minimum standard of meter time synchronisation making this MDP obligation redundant.</p> <p>AusNet Services strongly suggest the following changes are made, noting changes are in <b>red</b> and additional reasons are in <b>green</b>:</p> <p>(e) disaster recovery provisions related to:</p> <p>i. non-public telecommunications network redundancy; <b>and</b></p> <p><del>ii. time synchronisation of metering installations operated through the non-public telecommunications network.</del></p>	<b>Procedure only</b>	Please consider the issue raised, and amend the procedures as suggested to remove the redundant obligation
1.7		<b>Procedure only</b>	
1.8		<b>Procedure only</b>	
1.9		<b>Procedure only</b>	
1.10		<b>Procedure only</b>	
1.11			
1.12			

Meter Churn Package

Item	Description	Category	Participant Comments
1.13			
1.14			
1.15			
1.16			
1.17			
1.18			
1.19			
1.20			