



DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK

METER CHURN PACKAGE

Participant: Endeavour Energy

Completion Date: 04/12/2014

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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
1	PROPOSED/ REQUESTED CHANGES		
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>	Procedure only	<p>It is not clear why September or November 2015 is nominated when the next MSATS/B2B system release is May 2015. Given that there are actually no changes to MSATS or B2B due to this consultation another start date for consideration is 01/07/2015.</p>

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>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</p> <p>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.</p>	Procedure only	<p>Remove the lead in paragraph (see suggested wording below) because it is confusing and ineffective. It suggests that initially the data stream is left as active and when there is a delay in the change of MDP then the data stream is be made inactive. However it does not define what is meant by 'delay' is this 2 business days from the meter churn day or longer?</p> <p>By leaving the data stream active for a period of time it would then obligate the old MDP to substitute and deliver metering data for an interim period of time. This would allow current issues with the meter churn prior to FRMP role changes to perpetuate and it does not address the real issue which in this case is the delay in MDP role change. Once a new meter is installed and a new MDP is reading the new meter then there should be no obligation on the old MDP to manage metering data from that point onwards – this is one of the key principles of the meter churn design. The existing clause does not support this key principle and attempts to address an issue by placing extra obligation on a party (the old MDP) that has no control on the MDP role change. There</p>

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			<p>should be no reason for a delay in making the MDP role change – even if the new MDP is unable to read the new meter due to operational difficulties then this is not a reason for delaying the MDP role change because it would be the new MDP's responsibility to substitute the metering data as per the Metrology Procedure. If required AEMO should help to make the MDP role change in MSATS using CR5101, which would provide a better outcome.</p>
2.1	<p>FRMP Churn Procedure, change clause 1.1.3 to:</p> <p>This Procedure details the requirements for two<u>three</u> additional scenarios that require the <i>financially responsible Market Participant</i> to perform additional actions:</p> <p>a) Type 5 or 6 to a type 1-4 <i>Meter Churn</i> - where the <i>Local Network Service Provider</i> will remain as the <i>responsible person</i>:</p> <p>i. The <i>financially responsible Market Participant</i> may request the <i>responsible person</i> perform <i>Meter Churn</i> in accordance with the <i>B2B Procedures</i>, having first requested and accepted the <i>Local Network Service Provider's</i> offer to be the <i>responsible person</i>.</p> <p>b) Type 5 or 6 to a type 1-4 <i>Meter Churn</i> - where the <i>financially responsible Market Participant</i> intends on becoming the <i>responsible person</i>:</p> <p>i. The <i>financially responsible Market Participant</i> for the <i>market load</i> in MSATS can engage its selected service providers to perform <i>Meter Churn</i>, providing the <i>responsible person</i> has been made aware of the <i>Meter Churn</i> in advance. Following the <i>Meter Churn</i>, the <i>financially responsible Market Participant</i> must become the <i>responsible person</i> in accordance with the</p>		<p>Added an extra clause to reflect the scenario of a Type 1-4 to type 5 or 6 Meter Churn.</p> <p>AEMO stated in the draft determination that this is covered in the new clause 2.1.2</p> <p>We agree that in general the new clause 2.1.2 could cover the third scenario, however by adding the suggested clause it will provide more clarity. It clarifies that the FRMP, who may or may not be the RP, can initiate meter churn to type 5 or 6 only by requesting the LNSP and the request may be subjected to the B2B Procedures and jurisdictional requirements. An example of a jurisdictional requirement is the</p>

Item	Description	Category	Participant Comments
	<p>MSATS Procedures.</p> <p><u>c) Type 1-4 to type 5 or 6 Meter Churn - where the Local Network Service Provider will become the responsible person:</u></p> <p><u>i. The financially responsible Market Participant must request the Local Network Service Provider to perform Meter Churn in accordance with the B2B Procedures and jurisdictional requirements.</u></p>		metrology reversion policy.
2.2	<p>FRMP Churn Procedure, Figure 1 (page 5)</p> <p>The diagram does not allow a FRMP to become the RP when the existing site has a type 1 - 4 meter and the FRMP is not the currently the RP. Suggest that the diagram is modified as shown below in appendix A.</p>		<p>The FRMP has the right to become the RP should they wish. The diagram should reflect this.</p> <p>Two of the action boxes changed from 'perform meter churn' to 'initiate meter churn' to align with the text in the document.</p> <p>Also tidied up the diagram to make it easier to read.</p>
2.3	<p>FRMP Churn Procedure, suggest new clause 3.1.2.c:</p> <p><u>Where the Local Network Service Provider will become the responsible person for the metering installation as a result of the Meter Churn, the financially responsible Market Participant must request the Local Network Service Provider to perform Meter Churn in accordance with the B2B Procedures and jurisdictional requirements.</u></p>		<p>Added an extra clause to reflect the scenario of a Type 1-4 to type 5 or 6 Meter Churn.</p> <p>AEMO stated in the draft determination that this is covered in the new clause 2.1.2</p> <p>We agree that in general the new clause 2.1.2 could cover the third scenario, however by adding the suggested clause it will provide more clarity. It clarifies that the FRMP, who may or may not be the RP, can initiate meter churn to type 5 or</p>

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			6 only by requesting the LNSP and the request may be subjected to the B2B Procedures and jurisdictional requirements. An example of a jurisdictional requirement is the metrology reversion policy.
2.4	FRMP Churn Procedure, Clause 3.2.1 Where a <i>financially responsible Market Participant</i> initiates <i>Meter Churn</i> and there is a change in Metering Provider as a result of the Meter Churn , the <i>financially responsible Market Participant</i> must:		Reworded to clarify that the clauses within 3.2.1 applies even when there is no change in the Meter Provider e.g. clause 3.2.1.a and 3.2.1.g.
2.5	FRMP Churn Procedure, new clause 3.2.1.b.viii Whether the existing meter is a CT or WC meter		<p>Knowing whether the existing metering is whole current or has current transformers would help to determine if an outage is required.</p> <p>AEMO stated in the draft determination that this requirement is covered in 3.2.1.b.vii.</p> <p>However clause 3.2.1.b.vii allows the FRMP to provide further information on what work to be done. The Metering Provider requires information that would assist them on how to perform the work. The provision of this extra information would benefit the customer and the industry by allowing better outage planning. It would also allow help participants to be complaint with NECF obligations such as providing outage</p>

Item	Description	Category	Participant Comments
			notifications.
3.1	<p>MDP SLP, clause 8.1.2</p> <p>Sections 8.1.3, 8.1.4, 8.1.5 and 8.1.6 detail the requirements that the <i>Metering Data Provider</i> must comply with for the management of <i>metering data</i> and the construction of the MDFF and <i>MDM data file</i> associated with <i>Meter Churn</i> events when a <i>metering installation</i> is changed from:</p>		<p>Removed the reference to MDFF because later clauses and diagrams do not always specify how to construct a MDFF.</p> <p>AEMO stated in the draft determination that both MDM and MDFF files should be sent as per the scenarios.</p> <p>However the scenarios with accumulation meters only define how to construct the MDM data file and not the MDFF.</p>
3.2	<p>MDP SLP, change clause 8.1.3.a to:</p> <p>(a) The <i>Metering Data Provider</i> must have a process to ensure that:</p> <p>i. the final accumulation reading(s) from the removed type 6 <i>metering installation</i> is applied at the end of the <i>day</i> prior to the <i>Meter Churn</i> <u>when sending MDM data</u>;</p> <p>ii. the start reading(s) for a new type 6 <i>metering installation</i> is applied at the start of the <i>day</i> of the <i>Meter Churn</i> <u>when sending MDM data</u>; and</p> <p>iii. <i>estimated metering data</i> is provided for any data streams made active as a result of the <i>Meter Churn</i>,</p>		<p>Clarify that clauses 8.1.3.a.i & 8.1.3.a.ii is only applicable when sending metering data via MDM.</p> <p>AEMO stated in the draft determination that both MDM and MDFF files should be sent as per the scenarios.</p> <p>However these clauses only define how to construct the MDM data file and not the MDFF.</p>
3.3	<p>MDP SLP, change clause 8.1.4.a.i to:</p> <p>the final accumulation reading(s) from the removed type 6 <i>metering</i></p>		<p>Clarify that clause 8.1.4.a.i is only applicable when sending metering data via MDM.</p> <p>AEMO stated in the draft</p>

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	<i>installation</i> is applied at the end of the <i>day</i> prior to the <i>Meter Churn</i> when sending MDM data ; and		determination that both MDM and MDFF files should be sent as per the scenarios. However these clauses only define how to construct the MDM data file and not the MDFF.
3.4	MDP SLP, change to clause 8.1.5.a.iii to: the start reading(s) reading for the new type 6 <i>metering installation</i> is applied at the start of the <i>day</i> following the <i>day</i> of the <i>Meter Churn</i> when sending MDM data .		Clarify that clause 8.1.5.a.iii is only applicable when sending metering data via MDM. AEMO stated in the draft determination that both MDM and MDFF files should be sent as per the scenarios. However these clauses only define how to construct the MDM data file and not the MDFF.
3.5	MDP SLP, change to clause 8.1.6.a.iii & 8.1.6.a.x: 8.1.6.a.iii the <i>Metering Data Provider</i>, related to the new <i>metering installation</i>, must obtain <i>metering data</i> for the period of the <i>Meter Churn day</i> between the start of the <i>Meter Churn day</i> and the removal of the old <i>metering installation</i> from the <i>Metering Data Provider</i> related to the old <i>metering installation</i> and combine it with the <i>metering data</i> for the period of the <i>Meter Churn day</i> between the removal of the old <i>metering installation</i> up to the end of the <i>Meter Churn day</i>. The <i>Metering Data Provider</i> related to the new <i>metering installation</i> must deliver <i>metering data</i> for the whole <i>day</i> of <i>Meter Churn</i>. 8.1.6.a.iii the <i>Metering Data Provider</i> , related to the new <i>metering installation</i> , must obtain <i>metering data</i> for the period between the start of the <i>Meter Churn day</i> and the removal of the old <i>metering installation</i> from the <i>Metering Data Provider</i> related to the old <i>metering installation</i> .		Reworded and moved clauses to make the obligations easier to read and follow a logical order. Split the existing clause 8.1.6.a.iii into three clauses with slight rewording to make the sentences easier to read. The new clauses are now 8.1.6.a.iii, 8.1.6.a.iv and 8.1.6.a.vi. Moved existing clause 8.1.6.a.x to 8.1.6.a.v without any word changes.

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	<p>8.1.6.a.iv the <i>Metering Data Provider</i>, related to the new <i>metering installation</i>, must combine <i>metering data</i> from the old <i>metering installation</i> and the new <i>metering installation</i> for the <i>Meter Churn day</i>.</p> <p>8.1.6.a.v the <i>Metering Data Provider</i>, related to the new <i>metering installation</i>, must create final <i>substituted metering data</i> for the period between the existing <i>metering installation</i> being removed and the commissioning of the new <i>metering installation</i>.</p> <p>8.1.6.vi the <i>Metering Data Provider</i> related to the new <i>metering installation</i> must deliver <i>metering data</i> for the whole <i>day</i> of <i>Meter Churn</i>.</p>		
3.6	<p>MDP SLP, change to clause 8.1.6.b.i:</p> <p>Delete clause 8.1.6.b.i and replace it with existing clause 8.1.6.a.iv</p>		<p>Clause 8.1.6.b.i is redundant due to the new clause 8.1.6.a.iv</p> <p>Clause 8.1.6.a.iv should be moved to section 8.1.6.b because it is only applicable as per the lead in paragraph in clause 8.1.6.b</p>
3.7	<p>MDP SLP, change to clause 8.1.6.c:</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 day</i>.</p>		<p>Remove the lead in paragraph because it is confusing and ineffective. It suggests that initially the data stream is left as active and when there is a delay in the change of MDP then the data stream is to be made inactive. However it does not define what is meant by 'delay'. Is this 2 business days from the meter churn day or longer?</p> <p>By leaving the data stream</p>

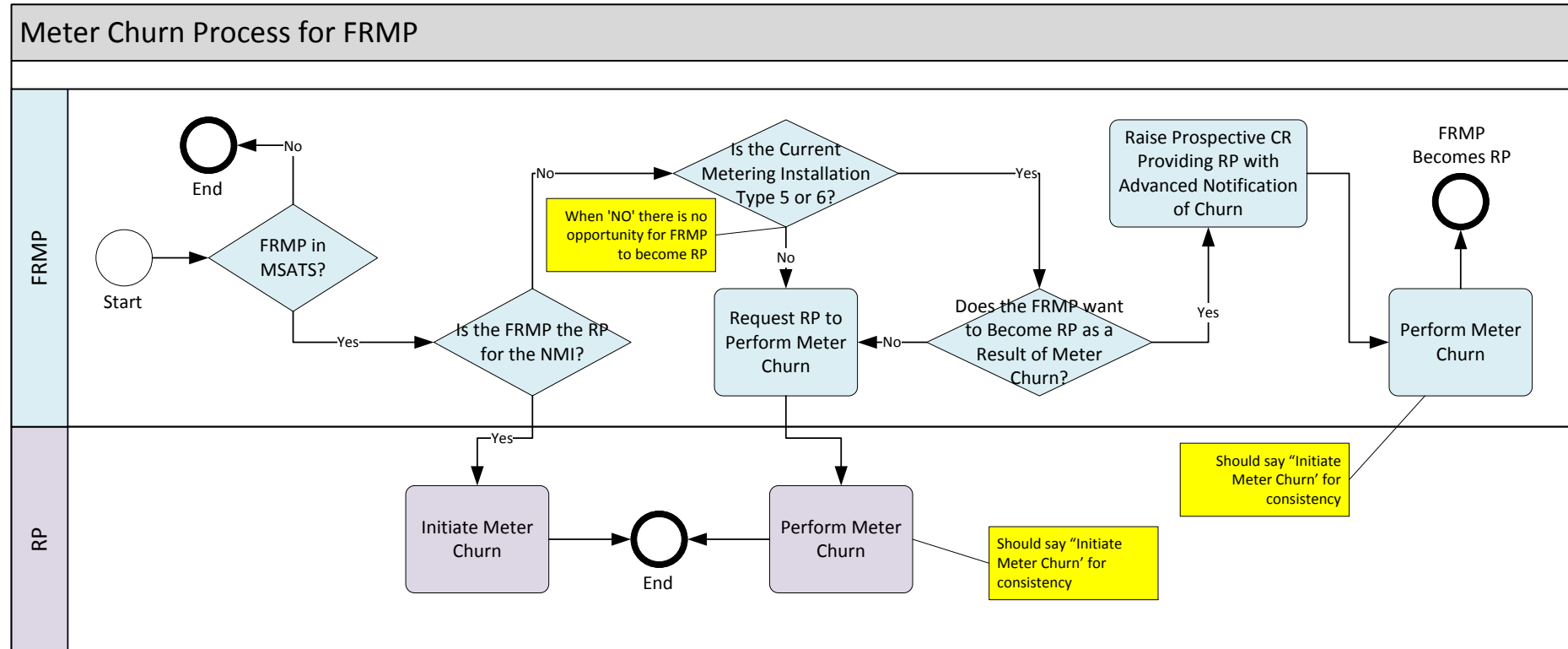
Item	Description	Category	Participant Comments
			<p>active for a period of time it would then obligate the old MDP to substitute and deliver metering data for an interim period of time. This would allow current issues with the meter churn prior to FRMP role changes to perpetuate and it does not address the real issue which in this case is the delay in MDP role change. Once a new meter is installed and a new MDP is reading the new meter then there should be no obligation on the old MDP to manage metering data from that point onwards – this is one of the key principles of the meter churn design. The existing clause does not support this key principle and attempts to address an issue by placing extra obligation on a party (the old MDP) that has no control on the MDP role change. There should be no reason for a delay in making the MDP role change – even if the new MDP is unable to read the new meter due to operational difficulties then this is not a reason for delaying the MDP role change because it would be the new MDP's responsibility to substitute the metering data as per the Metrology Procedure. If required AEMO should help to make the MDP role change in MSATS using CR5101, which would</p>

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			provide a better outcome.
3.8	<p>MDP SLP, new section Appendix A:</p> <p>Suggest that the four diagrams in section 8 are repeated here as examples with dates and times shown in the diagrams.</p>		<p>There were some confusion on how to read the diagrams and examples with dates and times shown would clarify any misunderstanding.</p> <p>AEMO stated in the draft determination that the diagrams and the text are complete and that a new appendix is not required.</p> <p>However experience has shown us that having examples provides better clarity and reduces complaints and enquires due to different interpretations.</p>
4.1	<p>MP SLP, changes to clause 4.11.6 & new clause 4.11.7:</p> <p>4.11.6 The Metering Provider must have a process to ensure that MSATS is updated as follows:</p> <p>a) for a type 6 to a type 1, 2, 3, 4, 5, or 6 Meter Churn meters are:</p> <p>i. removed in MSATS on the day of the physical removal of the meter(s).</p> <p>ii. installed in MSATS on the day of the physical installation of the meter(s).</p> <p>b) for a type 1, 2, 3, 4, or 5 to a type 6 Meter Churn meters are:</p> <p>i. removed in MSATS on the day after the physical removal of the meter(s).</p> <p>ii. installed in MSATS on the day after the physical installation of the meter(s).</p> <p>c) for a type 1, 2, 3, 4, or 5 to a type 1, 2, 3, 4, or 5 Meter Churn meters are:</p> <p>i. removed in MSATS on the day of the physical removal of the meter(s).</p> <p>ii. installed in MSATS on the day of the physical installation of the meter(s).</p>		<p>Suggested extra wording to clarify the effective start date of the changes in MSATS and which Metering Provider is obligated to perform each activity.</p>

Item	Description	Category	Participant Comments
	<p><u>4.11.6 The <i>Metering Provider</i>, related to the old <i>metering installation</i>, must have a process to ensure that MSATS is updated as follows:</u></p> <p><u>a) for a type 6 to a type 1, 2, 3, 4, 5, or 6 <i>Meter Churn</i> meters are removed in MSATS, using the day of the physical removal of the meter(s) as the removal date.</u></p> <p><u>b) for a type 1, 2, 3, 4, or 5 to a type 6 <i>Meter Churn</i> meters are removed in MSATS, using the day after the physical removal of the meter(s) as the removal date.</u></p> <p><u>c) for a type 1, 2, 3, 4, or 5 to a type 1, 2, 3, 4, or 5 <i>Meter Churn</i> meters are removed in MSATS, using the day of the physical removal of the meter(s) as the removal date.</u></p> <p><u>4.11.7 The <i>Metering Provider</i>, related to the new <i>metering installation</i>, must have a process to ensure that MSATS is updated as follows:</u></p> <p><u>a) for a type 6 to a type 1, 2, 3, 4, 5, or 6 <i>Meter Churn</i> meters are installed in MSATS, using the day of the physical installation of the meter(s) as the install date.</u></p> <p><u>b) for a type 1, 2, 3, 4, or 5 to a type 6 <i>Meter Churn</i> meters are installed in MSATS, using the day after the physical installation of the meter(s) as the install date.</u></p> <p><u>c) for a type 1, 2, 3, 4, or 5 to a type 1, 2, 3, 4, or 5 <i>Meter Churn</i> meters are installed in MSATS, using the day of the physical re installation of the meter(s) as the install date.</u></p> <p><u>d) redundant meters are removed from MSATS as a result of <i>Meter Churn</i>.</u></p>		

Appendix A

Issue with current Figure 1 in FRMP Churn procedure:



Proposed new diagram for Figure 1 in FRMP Churn procedure:

