



# DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK

## METER CHURN PACKAGE

***Participant:*** AGL

***Completion Date:*** 5<sup>th</sup> December 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
<b>1</b>	<b>PROPOSED/ REQUESTED CHANGES</b>		
1.1	<p>Comment Relating to all documents in response to the effective date proposal.</p> <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>	<b>Procedure only</b>	<p>AGL’s preference between the two options is to align the effective date with a November 2015 MSATS/B2B system release.</p> <p>AGL also requests AEMO inform participants formally as part of the consultation process if any conditions are placed with changing the effective date.</p>

Item	Description	Category	Participant Comments
	Implementation date of November 2015 to align with a MSATS/B2B system release.		
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	<p>AGL would like (i) to be further discussed at the next MSWG scheduled 9<sup>th</sup> December 2014 as part of the consultation review discussions.</p> <p>In particular to seek confirmation on what constitutes a delay? When would the data stream become inactive? The timing is important for the impacted FRMP/RP to understand to identify impacts with data processing.</p>
1.1.5	<p>Meter Churn Document</p> <p>In this procedure, diagrams are provided as an overview. If there are ambiguities between a diagram and the text, the text shall take precedence.</p>	Procedure only	<p>AGL does not support the insertion of this new clause, it is our opinion that figure 1 does not provide a sufficient overview of the process and that ambiguities between what is provided in a diagram and the text should not exist.</p> <p>AGL also notes that this insertion did not exist when there was several diagrams in the original document.</p>

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Item	Description	Category	Participant Comments
			<p>AGL is with the view that there is benefit with time being allocated to map the scenario's collectively with MSWG members as part of the next meeting scheduled 9<sup>th</sup> December 2014.</p> <p>As part of the Churn Package, there does not appear to be an end to end process map which captures the meter churn process and obligations across all relevant participants' roles and timelines.</p>
3 Obligations 3.1.4	<p>FRMP Meter Churn Procedure</p> <p>Where there will be a change in Metering Service Provider or responsible person as a result of Meter Churn then the financially responsible Market Participant must raise a prospective change request in MSATS nominating the role changes prior to initiating the Meter Churn.</p>	<b>Procedure only</b>	<p>AGL questions whether this clause is correct in its entirety. It is our understanding that it is also possible that a change of RP could occur retrospectively if agreed between participants. The current churn procedure includes a process overview of Meter Churn post transfer using a 6801 which AEMO is proposing to remove and we question why it is being removed rather than being modified. Is AEMO advising that a 6801 can no longer be used in a meter churn scenario?</p> <p>AGL would like to seek confirmation from AEMO on the following scenario. Is it possible that a new (prospective) FRMP may engage the current RP to request a meter churn prior to becoming FRMP and the new metering providers will also be notified in advance who will notify the current meter providers in advance of the meter churn and that this may not be done via MSATS initially? Notification could occur via email and also via B2B (if the LNSP is the RP) before the new FRMP raises a Change Role CATS Transaction in MSATS. In this case could it be possible that the new FRMP organises for the meter churn to occur in advance for the day after they become FRMP and then raises a retrospective change role in MSATS once FRMP to change the relevant roles after becoming FRMP?</p>
3 Obligations Figure 1 Meter churn Process for FRMP	Figure 1. Meter Churn Process for FRMP	<b>Procedure only</b>	<p>AGL supports a diagram being inserted to this procedure, however we do not support the diagram which has been inserted in its current state.</p> <p>AGL is supportive of figure 1 being discussed at the next MSWG meeting scheduled on the 9<sup>th</sup> December 2014, we would like to see time allocated to white board the various scenarios in order to confirm and agree if figure 1 is correct and what additional information is required.</p> <p>The current Meter Churn Procedures includes process maps for where Meter Churn can occur on the customer transfer date, Meter churn post MSATS customer transfer date using CR6800 and also CR6801. The proposed document updates removes these diagrams and we question why a meter churn could not occur on the customers transfer date or post MSATS customer transfer date using CR6800 and also CR6801 as long</p>

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			<p>as the physical change of the meter did not occur prior to the transfer completing in the market. AGL questions why these process maps are being removed and questions whether if rather these process maps should be reviewed and. The only process map which should be removed is 'Meter Churn Prior to customer transfer date.</p> <p>Whilst AEMO has included a new diagram (figure 1) 'Meter Churn Process for FRMP', in comparison to the diagrams which are being removed it is our view that the replacement is lacking the overview required on how the end to end process works. As a result the process could be interpreted differently by participants. The process diagram advises 'initiate meter churn' and perform meter churn' with no detail of the processes which could be followed.</p> <p>Diagrams have been updated to the MDP Service Level Procedure and also to the MPB Service Level Procedure to cover various churn scenarios, the MBP procedures also have a table inserted to accompany the tasks given in the diagram which provides a high level overview of the process, whereas this is not captured in the Meter Churn Procedure for FRMPs.</p> <p>There also appears to be an end to end process missing across all three documents. The diagrams in the three separate documents all use different formats and do not link or flow on from one another, they do not capture the end to end process.</p> <p>Figure 1 shows that the process ends if you are not FRMP or RP, however we believe this is incorrect as a prospective FRMP could engage with the current RP to request for a meter churn to occur as the RP could initiate meter churn at any time which is outlined under 3.1.1 'Meter Churn can be initiated by the responsible person at any time.</p> <p>The diagram shows that a prospective FRMP needs to wait until becoming FRMP or RP before they can engage with the current RP to initiate the meter churn, the diagram shows that the process ends unless you are FRMP in MSATS. Responses provided in the first round of consultation</p>

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Item	Description	Category	Participant Comments
			<p>advises that a prospective FRMP could commercially engage with the current RP prior to becoming the new FRMP and RP to initiate the meter churn. As long as the prospective FMRP have raised a prospective transfer and the transfer has passed the objection clearance period, and as long as the physical change of the meter does not occur until prior to the transfer completing in the market a prospective FRMP should be able to engage with the relevant participants to organise the meter churn in advance. It is in the interest of the customer if the prospective FRMP can align the meter churn to as close to the FRMP churn date as possible.</p> <p>An example of a scenario could be where a customer accepts a contract with a prospective FRMP with a future contract start date 1.12.2015, the prospective FRMP raises a transfer to become FRMP and RP (depends on the existing metering) from 1.12.2015, the current and new metering providers are engaged, along with the current RP prior to the transfer completing to organise the meter churn to occur after the day after the transfer is expected to complete for the 1.12.2015. The participant's responsible monitor to ensure it completes on the 1.12.2015 and the physical Meter churn occurs on the 3.12.2015. The diagram also shows that a FRMP could only raise a prospective CR providing the RP with advance notification of meter churn, however as AGL questioned above under 3 Obligations 3.1.4 whether this is correct in entirety and we question whether the diagram should also cater for where the current FRMP can raise a retrospective change role in the scenario where e.g. Transfer competes with basic metering 1.12.2015, Meter churn occurs on 3.12.2015 to an interval meter and current FRMP raises CR6801 to align with the meter churn date 3.12.2015.</p> <p>Should the diagram show that a new (prospective FRMP) could engage the current RP to request a meter churn, as long as the physical meter churn does not occur until the prospective FRMP is the current FRMP. The diagram only shows that a current FRMP can engage with a RP to initiate meter churn. An RP can initiate meter churn at any time, the procedures do not appear to prevent a prospective FRMP or RP from engaging with the current FRMP or RP to initiate meter churn to align with the transfer date.</p>

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Item	Description	Category	Participant Comments
3.2.1 f	<p>Meter Churn Procedure</p> <p>Ensure all role assignments in MSATS for the connection point are correct in accordance with MSATS procedures within 2 business days of the meter churn</p>	<b>Procedure only</b>	<p>Does this allow time for the change role transaction to complete? For example, post the meter churn you have 2 business days to raise the request to change the roles, however the roles in MSATS may be incorrect until the change role transaction completes in the market (REJ, REQ, OBJ, CAN, PEN, CAN)</p> <p>How does this clause work with clause 3.1.4 of the same procedures which advises that the FRMP must raise a prospective change request in MSATS nominating the roles prior to initiating the Meter Churn?</p>
General Comment	Meter Churn Procedure for FRMP	<b>Procedure only</b>	<p>Can AEMO please confirm if changes are required to B2B Procedure – Service Order Process V2.2?</p> <p>Please Refer to Figure 10 – Service Order Summary – Prospective Retailer. This figure shows that a new retailer (prospective retailer) could request for a meter adds and alteration or a meter re-configuration.</p> <p>AEMO's high level process documented in figure 1 of the Meter Churn Procedure advises that the process ends if the FRMP is not FRMP in MSATS.</p> <p>One of the scenarios in which AGL wants to seek confirmation on from AEMO as part of the scenario mapping exercise we recommend occurs is where a customer has a type 5 meter and the prospective FRMP has contracted a prospective customer who wants to initiate a meter churn for a prospective date and wants to change the meter to an interval meter to support their usage requirements. If the LNSP is the RP in this scenario raising the SO would be notifying them in advance of the request, and as long as the new FRMP have raised a prospective transfer and it has passed the objection clearance period the current FRMP and RP will also have visibility of the transfer. The new FRMP should be able to raise a prospective Service Order for a proposed date with a date set for after they are expecting to become FRMP (e.g. transfer raised for the 1.12.2015 with read type NI new interval, nominating to become RP,</p>



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Item	Description	Category	Participant Comments
			<p>service order raised for 3.12.2015) as long as the physical churn of the meter does not occur until after the prospective FRMP has become FRMP. The relevant participants will need to monitor to ensure the transfer completes and if it doesn't complete for some reason they will need to ensure the physical meter churn does not complete until the FRMP role changes.</p> <p>If a Service Order of this type can no longer be raised prior to becoming FMRP, Is AEMO expecting that the LSNP will have validations put in place to reject a service order of this type by a prospective FRMP? What rejection code should be used?</p> <p>AEMO's figure 1 in the meter churn document suggest that the prospective FRMP can take no action until they are FRMP, this includes initiating the meter churn.</p>
General Comment	Meter Churn Procedure for FRMP	Procedure only	<p>Can AEMO please confirm if changes are required to MSATS Procedure – CATS Procedure Principles and Obligations V4.1</p> <p>Refer to 4.13 Read Type Code Table 4M and Table 4-N which shows a new FRMP (prospective FRMP) could raise a transfer with Read Type Code NI – New interval Meter. Description of Code advises this applies to type 1-5 metering installations and type 6 metering installations that are being replaced with an interval meter.</p> <p>Read Type Code is only required for Transfers raised by new FRMP's.</p> <p>AGL would like AEMO to confirm if the new FRMP (prospective) approaches the current RP and service providers prior to becoming FRMP to organise for a meter churn to occur on the transfer date can the prospective FRMP still raise a transfer with this read type? If this read type can no longer be used what will happen to the transfer?</p>

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Item	Description	Category	Participant Comments																																																																																																																																					
			<table><tr><td>EI</td><td>Existing Remotely-Read Interval Meter</td><td>Advice from the new FRMP to the MDP that there is an existing remotely-read interval meter or meters at the connection point and that the existing meters will continue to be used after the transfer. Applies to type 1 to 4 metering installations only.</td></tr><tr><td>NI</td><td>New Interval Meter</td><td>Advice from the new FRMP to the MDP that a new interval meter is to be installed at the site as part of the process to complete this transfer. If this is an existing active connection point and therefore there is already a meter, there will need to be a final read for the existing meter. Applies to type 1 to 5 metering installations and type 6 metering installations that are being</td></tr></table> <table><tr><th>Code</th><th>Name of code</th><th>Description of code</th></tr><tr><td></td><td></td><td>replaced with an interval meter.</td></tr></table> <div>Table 4-N – Valid Combinations of Read Type Codes, Metering Installation Codes and Change Reason Codes</div> <table><tr><th rowspan="12">Read Type Code</th><th colspan="2">CR Code</th><th colspan="2">1000</th><th colspan="2">1010, 102X, 1040</th><th colspan="2">1030</th><th colspan="2">All CR Codes</th></tr><tr><th colspan="2">Metering Installation Code</th><th>BASIC</th><th>MRIM</th><th>BASIC</th><th>MRIM</th><th>BASIC</th><th>MRIM</th><th>COMMSx</th><th>UMCP</th></tr><tr><td>NS</td><td>Next Scheduled Read Date</td><td>Yes</td><td>Yes</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td></tr><tr><td>RR</td><td>Next Read Date</td><td>Yes</td><td>Yes</td><td>No</td><td>No</td><td>Yes</td><td>Yes</td><td>No</td><td>No</td></tr><tr><td>SP</td><td>Special Read</td><td>Yes</td><td>Yes</td><td>No</td><td>No</td><td>Yes</td><td>Yes</td><td>No</td><td>No</td></tr><tr><td>ER</td><td>Estimated Read</td><td>Yes</td><td>Yes</td><td>Yes</td><td>No</td><td>Yes</td><td>Yes</td><td>No</td><td>No</td></tr><tr><td>CR</td><td>Consumer Read</td><td>Yes</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td></tr><tr><td>PR</td><td>Previous Read Date</td><td>No</td><td>No</td><td>Yes</td><td>Yes</td><td>No</td><td>No</td><td>No</td><td>No</td></tr><tr><td>UM</td><td>Unmetered Connection Pt</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>Yes</td></tr><tr><td>EI</td><td>Existing Interval Meter</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>Yes</td><td>No</td></tr><tr><td>NI</td><td>New Interval Meter</td><td>Yes</td><td>Yes</td><td>No</td><td>No</td><td>Yes</td><td>Yes</td><td>Yes</td><td>No</td></tr><tr><td>NB</td><td>Future Move In (Basic)</td><td>No</td><td>No</td><td>No</td><td>No</td><td>Yes</td><td>Yes</td><td>No</td><td>No</td></tr></table> <div>Note: 1080 is the same as 1000, 1081 is the same as 1010, 1083 is the same as 1030, and 1084 is the same as 1040.</div> <div>Note: 102X refers to 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028 and 1029.</div> <div>Note: COMMSx refers to COMMS1, COMMS2, COMMS3, COMMS4.</div>	EI	Existing Remotely-Read Interval Meter	Advice from the new FRMP to the MDP that there is an existing remotely-read interval meter or meters at the connection point and that the existing meters will continue to be used after the transfer. Applies to type 1 to 4 metering installations only.	NI	New Interval Meter	Advice from the new FRMP to the MDP that a new interval meter is to be installed at the site as part of the process to complete this transfer. If this is an existing active connection point and therefore there is already a meter, there will need to be a final read for the existing meter. Applies to type 1 to 5 metering installations and type 6 metering installations that are being	Code	Name of code	Description of code			replaced with an interval meter.	Read Type Code	CR Code		1000		1010, 102X, 1040		1030		All CR Codes		Metering Installation Code		BASIC	MRIM	BASIC	MRIM	BASIC	MRIM	COMMSx	UMCP	NS	Next Scheduled Read Date	Yes	Yes	No	No	No	No	No	No	RR	Next Read Date	Yes	Yes	No	No	Yes	Yes	No	No	SP	Special Read	Yes	Yes	No	No	Yes	Yes	No	No	ER	Estimated Read	Yes	Yes	Yes	No	Yes	Yes	No	No	CR	Consumer Read	Yes	No	No	No	No	No	No	No	PR	Previous Read Date	No	No	Yes	Yes	No	No	No	No	UM	Unmetered Connection Pt	No	No	No	No	No	No	No	Yes	EI	Existing Interval Meter	No	No	No	No	No	No	Yes	No	NI	New Interval Meter	Yes	Yes	No	No	Yes	Yes	Yes	No	NB	Future Move In (Basic)	No	No	No	No	Yes	Yes	No	No
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4.11.1 b)	MPB SLP  4.124.11 Meter Change Process From Installation Types 1, 2, 3 or 4	Procedure only	AGL questions b) and how this will work in the scenario if participants commercially agree to organise for the meter churn request to be raised prior to the new FMRP becoming the FMRP and or RP (as long as the physical churn of the meter doesn't occur prior to the new FRMP becoming the FRMP or a change in RP). This appears to be suggesting that the new FRMP has to wait until the transfer completes and then raise																																																																																																																																					

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Item	Description	Category	Participant Comments
	<p>4.11.1 The Metering Provider must only undertake meter churn when the request to do so has been provided by a responsible person or the financially responsible Market Participant for the Market Load in MSATS and:</p> <p>a) they are the Meter Provider in MSATS, or</p> <p>b) there is a change request nominating them as the Metering Provider and the change request has passed the objection logging period in accordance with the MSATS Procedures.</p>		<p>a prospective change role transaction to change the service providers and wait until the objection clearance period of 5 business days' expires before undertaking the meter churn which will further push out the meter churn process further. Does the new FRMP need to take into consideration the objection clearance period when requesting a meter churn date? The B2B Procedure for Service Orders advises for an Adds and Alts there is no notice period.</p> <p>This comment also ties into the question AGL raised above 3 Obligations 3.1.4 of the Meter Churn Procedure for FRMPs and 3 Obligations Figure 1 Meter churn Process for FRMP if a retrospective CATS change role transaction could occur.</p>
4.11.2	<p>MPB SLP</p> <p>Prior to conducting meter churn from a type 1, 2, 3 or 4 metering installation to a</p> <p>type 1, 2, 3, 4 or 5 metering installation (and to a type 6 subject to the jurisdictional reversion policy in the metrology procedure), the Metering Provider must make reasonable endeavours to contact the current Metering Data Provider</p>	<b>Procedure only</b>	<p>To add clarity to the reading of this clause, AGL would like to suggest that new or prospective is placed in front of Metering Provider.</p> <p>Prior to conducting meter churn from a type 1, 2, 3 or 4 metering installation to a type 1, 2, 3, 4 or 5 metering installation (and to a type 6 subject to the jurisdictional reversion policy in the metrology procedure), the <b>new</b> Metering Provider must make reasonable endeavours to contact the current Metering Data Provider</p>

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Item	Description	Category	Participant Comments
4.11.3	<p>MPB SLP</p> <p>Prior to conducting meter churn from a type 5 or 6 metering installation to a type 1, 2, 3, or 4 metering installation, the Metering Provider must make reasonable endeavours to contact the current Metering Provider and/or Local Network Service Provider and:</p>	<b>Procedure only</b>	<p>To add clarity to the reading of this clause, AGL would like to suggest that new or prospective is placed in front of Metering Provider.</p> <p>Prior to conducting meter churn from a type 5 or 6 metering installation to a type 1, 2, 3, or 4 metering installation, the <b>new</b> Metering Provider must make reasonable endeavours to contact the current Metering Provider and/or Local Network Service Provider and:</p>
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