



DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK

METER CHURN PACKAGE

Participant: EnergyAustralia

Completion Date: 8 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
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>		EnergyAustralia supports alignment to the November 2015 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>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>EnergyAustralia is concerned that making the data stream inactive in does not reflect there is usage occurring at the site. There is potential if there are hold ups to the new MDP updating data streams the LR will be financially impacted at settlements, the LR will have no recourse to ensure the FRMP and MDP are undertaking their requirements in a timely fashion. This would be of critical concern in a high price period.</p> <p>It is noted in the combined MDP Participant Response Pack Ausgrid also made comments on 8.1.6 (c) which AEMO accepted and the two clauses were retained.</p>
1.3	<p>1.2.1 This Meter Churn Procedure details the requirements that the <i>financially responsible Market Participant</i> and the <i>responsible person</i> must consider in the management of <i>Meter Churn</i> resulting from an alteration to a <i>metering installation</i>.</p> <p>1.2.2 In accordance with clause 7.3.4 (m) of the <i>Rules</i>, this Meter Churn Procedure also applies to <i>financially responsible Market Participants</i> who are not the</p>	FRMP Churn	<p>This procedure is established under Rules (7.3.4 (j)) for the FRMP only not the RP as 1.2.1 suggests. The following changes to clauses 1.2.1 and 1.2.2 to correct this error:</p> <p>1.1 Introduction</p> <p>1.1.1 This Meter Churn Procedure details the requirements that the <i>financially responsible Market Participant</i> :</p> <p>a) who is the <i>responsible person</i> must consider in the</p>

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	<i>responsible person</i> for a type 5 or type 6 <i>metering installation</i> that is being altered.		<p>management of <i>Meter Churn</i> resulting from an alteration to a <i>metering installation</i>.</p> <p>b) who is not the <i>responsible person</i> for a type 5 or type 6 <i>metering installation</i> that is being altered.</p> <p>The move to an Introduction also rectifies the document commencing with Interpretation, which is in misalignment to other AEMO documents.</p>
1.4	<p>Endeavour Energy put forward the following suggestion in round one consultation:</p> <p>Change clause 1.1.3 to:</p> <p>This Procedure details the requirements for two-three 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></p>	Procedure only	<p>EnergyAustralia supports the addition of the additional scenario provided by Endeavour Energy.</p> <p>The first stage response provided by AEMO does not reflect that a FRMP RP can't be responsible for a type 5 or 6 meter type.</p> <p><i>AEMO consider that the recommended change is covered in section 1.1.2 (now 2.1.2). The FRMP would either be the RP, or would be liaising with the RP, who would be responsible for instigating the meter churn. Either way, the meter churn would be undertaken by the RP rather than the FRMP.</i></p> <p>The addition of this clause provides clarity that there is an interaction between the FRMP and the LNSP to undertake the reversion to 5 or 6, which provides clarity. The clause 2.1.2 does not reflect the nuance that a FRMP RP can't install a 5 or 6 meter.</p>

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	<p>must become the <i>responsible person</i> in accordance with the 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 <i>responsible person</i>:</u></p> <p><u>i. The <i>financially responsible Market Participant</i> must request the Local Network Service Provider to perform Meter Churn in accordance with the B2B Procedures and jurisdictional requirements.</u></p>		
1.5	<p>Ausgrid's first round comments:</p> <p>"There is no mention of a Type 1-4 to Type 1-4 meter churn scenario?</p> <p>That is, if the FRMP initiates meter churn for an existing Type 1-4 installation and wants to become the RP."</p> <p>1.1.3 This Procedure details the requirements for two additional scenarios that require the <i>financially responsible Market Participant</i> to perform additional actions:</p> <p>c) Type 5 or 6 to a type 1-4 Meter Churn - where the Local Network Service Provider will remain as the responsible person:</p> <p style="padding-left: 40px;">i. The <i>financially responsible Market Participant</i> may request the responsible person perform Meter Churn in accordance with the B2B Procedures, having first requested and accepted the Local Network Service Provider's offer to be the responsible person.</p> <p>d) Type 5 or 6 to a type 1-4 Meter Churn - where the <i>financially responsible Market Participant</i> intends on becoming the responsible person:</p> <p style="padding-left: 40px;">i. The <i>financially responsible Market</i></p>	Procedure only	<p>EnergyAustralia agrees that this scenario needs to be included. The following wording suggested:</p> <p>b) Type 1 - 4 to a type 1 - 4 Meter Churn - 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 market load in MSATS can engage its selected service providers to perform Meter Churn, providing the <i>responsible person</i> has been made aware of the Meter Churn in advance. Following the Meter Churn, the <i>financially responsible Market Participant</i> must become the <i>responsible person</i> in accordance with the MSATS Procedures.</p>

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	<p><i>Participant for the market load in MSATS can engage its selected service providers to perform Meter Churn, providing the responsible person has been made aware of the Meter Churn in advance. Following the Meter Churn, the financially responsible Market Participant must become the responsible person in accordance with the MSATS Procedures.</i></p>		
1.6	<p>Consistent with Endeavour Energy's and Ausgrid's first round comments, following clause is required:</p> <p>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>	Procedure only	Consistent with changes to 1.1.3 this clause is required to reflect 1-4 to 5-6. The 1-4 to 1-4 is covered by clause 3.1.2 b).
1.7	<p>Figure 1.</p> <p>Further work is required to provide clarity.</p>	Procedure only	<p>FRMP in MSATS – if no = win customer in MSATS. Then back to start. Not No = End.</p> <p>First box in RP change initiate meter churn to Perform meter churn to be consistent.</p> <p>What about if site is 1-4 ? Or if going back to 5-6? More process boxes required or replicate for different meter changes.</p> <p>Clause 2.1.3 b) i) requires FRMP to make RP 'aware'. This</p>

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			<p>may not be via a CR in MSATS yet Figure 1 requires a CR? The box needs be reworded to <i>Make RP aware of meter change</i>.</p> <p>New box after Perform meter churn – Raise CR for appropriate parties in MSATS. End is in RP not FRMP.</p> <p>Suggest numbering steps.</p>