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DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK MSWG DISCUSSION

METER CHURN PACKAGE

FRMP Churn Document

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1. Proposed Changes

• Meter Churn procedure for Financially Responsible Market Participants (New Document)

NOTE: <u>No proposed changes have been populated please refer to mapping documents and change marked procedures</u>. <u>Please complete where necessary</u> Please include your comments in the 'Participant Comment' column below.

A. Proposed Changes to the Meter Churn Package

Item/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
1	PROPOSED/ REQUESTED CHANGES			
	General Comment	Procedure only	Energex <u>General comments or questions</u> The FRMP procedures ends up being a bit light on when you look at the clean document. Shouldn't there be a diagram explaining timing on FRMP changes as opposed to timing on meter install and other role change effective dates? This procedure clearly states that we must be RP to perform a meter churn, so for COMMS to BASIC we must be RP prior to initiating a meter churn (even though we have received a request from the FRMP) We will need to decide where the meter churn notification under 3.1.2 b). Perhaps an additional contact on the ROCL should be requested, Would be nice to have a diagram in the	AEMO have included a diagram which is consistent with the changes made to the FRMP churn procedure.
			would be flice to have a diagram in the	

Item/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
			procedure.	
1.1.1	Meter Churn occurs when components of a metering installation are changed or altered resulting in a change to the nature of metering data produced by the metering installation. Meter Churn can also occur when components of a metering installation are changed and there is also a change of Metering Service Provider(s).		 Ausnet Services The proposed wording 1.1.1 does not align with the meter churn definition and would imply the change of a component that does not affect MDFF metering data for example replacing a CT represents meter churn. Suggest the following changes are made, noting changes are in red: 1.1.1 Meter Churn occurs when components of a metering installation one or more meters are changed or altered at a metering installation resulting in a change to the nature of metering that alters the MDFF or MDM metering data file data produced by the metering installation. Meter Churn can also occur when components of a metering installation are changed and there is also a change of Metering Service Provider(s). Please amend drafting as indicated noting: 1.1.1 needs to align with the definition in 1.5. The need to clarify what we mean by a change of the nature of metering. 	 AEMO, in consultation with the MSWG agreed - the identified conflict between the definition of meter churn and the original section 1.1 has been resolved. The background section has been moved to section 2, following the definition section. The original 1.1.1 is now 2.1.1 and reads as follows: <i>Meter Churn</i> can result in a change to the configuration of <i>metering data</i> recorded by a <i>metering installation</i>. This change in <i>metering data</i> may result in an alteration to the MDFF or MDM <i>metering data</i> file. A change of Metering Service Provider(s) may instigate <i>Meter Churn</i>.
1.1.1	Meter Churn occurs when components of a metering installation are changed or altered resulting in a change to the nature of metering data produced by the metering installation. Meter Churn can		UE 1.1.1 refers to meter churn as the churn of the components of a metering installation when they are changed or altered (without a change of service provider) and also refers to when	AEMO – see comments in response to Ausnet Services comments above.
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Item/	Description	Category	Participant Comments	AEMO/MSWG Comments
Clause				
	also occur when components of a metering installation are changed and there is also a change of Metering Service Provider(s).		components are changed and there is a change of service provider. The change of a CT or the reconfiguration of a meter to have an export stream is not the purpose of this procedure. Suggest the drafting being amended to change of meters and service provider roles at a metering installation in line with the definition in 1.5.1. UE query whether the purpose of this procedure is the DataStream aspects of a change of meter configuration without a role change. Suggest adopting drafting similar to 1.5.1	
1.1.2	The responsible person can initiate Meter Churn at any time. Where the financially responsible Market Participant is not the responsible person, the financially responsible Market Participant for the market load may request the responsible person perform Meter Churn in line with the B2B Procedures.		Energex 1.1.2 Under what circumstances would the FRMP who is not the RP request the RP to perform Meter Churn other than in 1.1.3 a)? Would they engage a meter provider, not the RP.	AEMO – in answer to the question from Energex: for a type 1-4 metering installation where the FRMP has previously accepted an offer from the LNSP to be the RP.
1.1.2	The responsible person can initiate Meter Churn at any time. Where the financially responsible Market Participant is not the responsible person, the financially responsible Market Participant for the market load may request the responsible person perform Meter Churn in line with the B2B Procedures.		AGL AGL would like to question in particular for type 1-4 scenarios where the incoming Financially Responsible Market Participant intends on becoming the new Responsible Person (where they select to become FRMP and RP as part of the transfer request) and the customer wants the meter churn to occur on	AEMO – The meter churn would not be able to be effected until the financially responsible market participant (FRMP) was the FRMP for the market load in MSATS, the FRMP had become the responsible person (RP), or the RP had itself initiated the meter churn on the request of the prospective FRMP/RP. The NER and Procedures do not prevent or hinder a FRMP from engaging in commercial discussions with providers, however they do

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Clause				
			the transfer date. Does Chapter 7 of the	specify who the authorised parties are for initiating churn, as detailed in the NER and this
			National Electricity Rules under 7.2.5 Role of	procedure.
			the responsible person (e) and (2) provide	
			ability for the incoming responsible person to	Regarding NER 7.2.5 (e) 2, this does not provide the ability for a FRMP who is not the
			at least engage with its selected service	FRMP for the market load in MSATS to
			providers prior to becoming FRMP and RP to	instigate meter churn. The MSATS procedures do not specify that the incoming
			request for Meter Churn to occur on the	RP is responsible for a metering installation.
			transfer proposed date? Providing the	The MSATS procedures are drafted in a manner which details the method of interacting
			responsible person has been made aware of	with MSATS, rather than conferring
			the Meter Churn in advance, rather than	responsibilities or obligations as considered in this clause.
			having to wait to become FRMP and RP before	uns clause.
			being able to engage with its selected service	
			providers to request for Meter Churn.	
			As per Version 65 of the National Electricity Rules (Chapter 7) page 917, it advises that the MSATS Procedures may specific that an incoming responsible person is responsible for the metering installation on either the day the transfer completes from one FRMP to another FRMP or any other day.	
			7.2.5 Role of the responsible person	
			(e) The Market Settlements and Transfer Solution Procedures may specify that an incoming responsible person is responsible for the metering installation:	
			(1) on the day that a <i>market load</i> transfers from one <i>financially responsible Market</i>	

Item/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
			Participant to another financially responsible Market Participant for the period within that day; or (2) on any other day.	
1.1.2	The responsible person can initiate Meter Churn at any time. Where the financially responsible Market Participant is not the responsible person, the financially responsible Market Participant for the market load may request the responsible person perform Meter Churn in line with the B2B Procedures.		Ausnet Services The proposed wording 1.1.2 gives the wrong impression that there are no restrictions to meter churn. Suggest the following changes are made, noting changes are in red: 1.1.2 The responsible person can initiate Meter Churn at any time where allowed by the NER and jurisdictional rules. Please amend the drafting to recognise all metering rules, including jurisdictional rules	AEMO, in consultation with the MSWG, determined that the NER allow the RP to instigate meter churn at any time. AEMO are not aware of any restrictions that need to be allowed for. This procedure is for FRMPs; RPs are required to meet the provisions in the NER, which includes requirements specific to jurisdictions.
1.1.2	The responsible person can initiate Meter Churn at any time. Where the financially responsible Market Participant is not the responsible person, the financially responsible Market Participant for the market load may request the responsible person perform Meter Churn in line with the B2B Procedures.		UE 1.1.2 The drafting refers to meter churn in line with a B2B request. Suggest that the meter churn request also be in line with the NER, NMP and any jurisdictional instruments. It is misleading to suggest that the B2B request is the only aspect for consideration. The FRMP and RP should comply with all metering rules. Amend the drafting to recognise all metering rules, including jurisdictional rules.	AEMO note that there are a large number of obligations on the FRMP and RP in the NER and associated instruments. AEMO in consultation with the MSWG, removed "in line with B2B Procedures". Section has been moved to 2.1.2 and now reads as follows: The <i>responsible person</i> can initiate <i>Meter Churn</i> at any time. Where the <i>financially responsible Market</i> <i>Participant</i> is not the <i>responsible</i> <i>person</i> , the <i>financially responsible</i> <i>Market Participant</i> for the <i>market load</i> may request the <i>responsible person</i> perform <i>Meter Churn</i> .

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: a) Type 5 or 6 to a type 1-4 Meter Churn - where the Local Network Service Provider will remain as the responsible person: <i>i</i>. The financially responsible Market Participant may request the responsible person perform Meter Churn in accordance with the B2B Procedures, having first requested and 	Endeavour Change clause 1.1.3 to: This Procedure details the requirements for two three additional scenarios that require the <i>financially responsible Market Participant</i> to perform additional actions: 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> : 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</i> <i>Procedures</i> , having first requested and accepted the <i>Local Network Service Provider</i> 's offer to be	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.
accepted the Local Network Service Provider's offer to be the responsible person. b) Type 5 or 6 to a type 1-4 Meter Churn - where the financially responsible Market Participant intends on becoming the responsible person:	 the responsible person. b) Type 5 or 6 to a type 1-4 Meter Churn - where the financially responsible Market Participant intends on becoming the responsible person: i. The financially responsible Market Participant for the market load in MSATS can engage its 	
i. The financially responsible Market 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,	selected service providers to perform <i>Meter</i> <i>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 MSATS Procedures. <u>c) Type 1-4 to type 5 or 6 <i>Meter Churn</i> - where</u>	

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	the financially responsible Market Participant must become the responsible person in accordance with the MSATS Procedures.		the Local Network Service Provider will becomethe responsible person:i. The financially responsible Market Participantmust request the Local Network ServiceProvider to perform Meter Churn in accordancewith the B2B Procedures and jurisdictionalrequirements.	
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: c) Type 5 or 6 to a type 1-4 Meter Churn - where the Local Network Service Provider will remain as the responsible person: <i>ii</i>. The financially responsible Market Participant 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. d) Type 5 or 6 to a type 1-4 Meter Churn - where the financially responsible person. ii. The financially responsible person. 		Ausgrid There is no mention of a Type 1-4 to Type 1-4 meter churn scenario? That is, if the FRMP initiates meter churn for an existing Type 1-4 installation and wants to become the RP.	AEMO note that for a metering installation type1-4 to 1-4 meter churn scenario, the document already details how meter churn can operate. 1.1.2 (now 2.1.2 in the draft determination) covers the scenario where the FRMP can request the RP instigate meter churn and also the right for the RP to instigate meter churn. Therefore, if the FRMP is the RP, they can instigate churn when they want to. If the FRMP is not the RP then it can either request the LNSP RP perform meter churn or alternatively it can become the RP and instigate churn.
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Item/	Description	Category	Participant Comments	AEMO/MSWG Comments
Clause	engage its selected service providers to perform <i>Meter</i> <i>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</i> <i>Market Participant</i> must become the <i>responsible</i> <i>person</i> in accordance with the MSATS Procedures.			
1.1.3	This Procedure details the requirements for two additional scenarios that require the financially responsible Market Participant to perform additional actions: e) Type 5 or 6 to a type 1-4 Meter Churn - where the Local Network Service Provider will remain as the responsible person: iii. The financially responsible Market Participant 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. f) Type 5 or 6 to a type 1-4 Meter Churn - where the financially	10 of 20	AGL The proposed changes as per 1.1.3 of the Meter Churn Procedures advises the financially responsible Market Participant is to notify the current Responsible Person in advance of the Meter Churn. It is our opinion the end to end process of how this is to occur is not clearly outlined in proposed changes. It is our assumption from reading 1.1.3 b) of the Meter Churn Procedure proposed changes, that the FMRP can raise a request for a Meter Churn and raise a CATS Change Role Notification to become RP and change relevant Metering Roles at the same time and these notifications would notify the current Responsible Person of the Meter Churn in advance. It is our view AEMO's drafting is not transparent by advising under b) 'providing the responsible person has been made aware of the Meter Churn in advance' It is our assumption as per the rules that the	AEMO – The proposed date of a change request is just that, a proposed date. If the meter installation is physically performed after the proposed date the MDP would send the date of the meter installation to complete the CR 6800. This would then make all of the roles raised in that CR effective from the meter installation date and not the proposed date. AEMO will refer the BRMG chair to any changes made to the procedures on final determination, for consideration regarding the BDPIP diagrams.

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Clause				
	responsible Market Participant intends on becoming the responsible person: iii. The financially responsible Market 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.		CR 1500 only has 20 business days retrospectively for a CR6800 and a CR6801 does not require a CR1500 but this is to complete overnight using the proposed date provided in the CR. The Service Level Procedures for MPB section 4.14 task 8 obligates them to schedule and undertake work (up to 10 business days), it is our expectation the MDP will have to meet the 20 business day's obligation and that the MPB abides by their obligations in the SLP. We want to avoid situations where we have raised the request for the Meter churn to occur and it does not complete and we also have to withdraw our Change Role request to re-raise it again. There is some concern internally where the meter churn request may not complete. The current Meter Churn Procedure includes some high level diagrams associated with retail transfers (e.g. Meter Churn On Customer Transfer Date, Meter Churn Post Transfer Date) however AEMO is proposing to remove these maps, and it is AGL's view that the maps which have been inserted in the Service Level Procedures for Meter Data Provider Services are not sufficient replacements as they only include 'day -1 midnight of day of meter churn' and what occurs when the churn completes, they do not appear to include what needs to occur as part of organising the meter churn , role changes etc. If AEMO is proposing to remove the existing diagrams from the Meter Churn Procedure we propose they should be replaced with diagrams to cover the relevant scenario's, end to end high level process including time line (e.g.	

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			from obtaining EIC to, entering transactions in MSATS with relevant roles, meter churn request, relevant MSATs transactions, CR 1500 etc.) to ensure processes are transparent and not left open for possible different interpretation by participants. AGL also recommends AEMO reviews the BDPIP Process Flow Diagrams to determine what modifications may be required. AEMO does not appear to have considered these as part of this consultation package, participants do utilise these process flow diagrams although they do not appear to have been updated for some time.	
1.2.1	In this procedure words that are shown in italics have the meaning specified in the <i>Rules</i> , or if they are not specified in the <i>Rules</i> , they have the meaning specified in section 1.4 of this procedure.		Energy Australia Update clause number to 1.5	AEMO agrees, although with other changes to the document, this reference is now correct as 1.4.
1.2.2	A reference in this procedure to a provision in the <i>Rules</i> is taken to be a reference to that provision as renumbered from time to time.		UE 1.2.2 Suggest that once the rules are rewritten that the relevant references in this procedure are updated. The rewrite of Chapter 7 may have other impacts in this procedure which will need to be updated eg change of RP to MC etc. UE suggest deleting the clause	AEMO – Noted: whenever changes are made to the NER, AEMO revisit procedures and guidelines to perform an impact assessment regarding those changes.
1.3.2	In accordance with clause 7.3.4 (m) of the <i>Rules</i> , this Meter Churn Procedure also applies		AGL	AEMO – agreed, 7.3.4 (m) is related to 7.4.3 (e) which relates directly to metering installation types 5, 6 and 7. This section
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ltem/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
	to <i>financially responsible Market Participants</i> who are not the <i>responsible person</i> for a type 5 or type 6 <i>metering installation</i> that is being altered.		AEMO's reference to 7.3.4 (m) of the Rules appears to also reference only type 5 or Type metering installations.	refers to the scenario where the FRMP is not the RP but wishes to initiate meter churn.
1.5.	 Definitions Meter Churn - Meter Churn occurs where one or more meters are changed or altered at a metering installation. new Metering Data Provider, new Metering Provider, - A Metering Service Provider, that is not, but is proposed to be, the active participant in MSATS for the connection point. current Metering Data Provider, current Metering Provider, current responsible person A Metering Service Provider, Registered Participant or Market Participant that is the active participant in MSATS for the connection point. 		Endeavour New clause, suggest after clause 1.5.1: <u>Metering Service Provider – a Metering Data</u> <u>Provider or a Metering Provider.</u> The term 'Metering Service Provider' is used in the document but was not defined.	AEMO disagrees, the Metering Service Provider is referenced in section 1.2.4 (now 1.1.4 in draft determination).
1.5.1	1.5.1 Meter Churn - <i>Meter Churn</i> occurs where one or more <i>meters</i> are changed or altered at a <i>metering installation</i> .		Ausnet Services Suggest the following changes are made to 1.5.1, noting changes are in red: 1.5.1 Meter Churn - Meter Churn occurs where one or more meters are changed or altered at a metering installation resulting in a change to the nature of metering that alters the MDFF or MDM metering data file. Please amend drafting as indicated to clarify	AEMO – see comments in response to Ausnet Services comments on section 1.1.1 above. The definition of meter churn is accurate.

Item/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
Clause			what is and what isn't meter churn	
3.1	 Initiating Meter Churn 3.1.1 Meter Churn can be initiated by the responsible person at any time. 3.1.2 Meter Churn can be initiated by the financially responsible Market Participant for the relevant market load, as recorded in MSATS, in the following circumstances: a) Where the financially responsible Market Participant does not intend to become the responsible person for the metering installation as a result of the Meter Churn, the financially responsible Market Participant may request the responsible person to perform Meter Churn in 		AGL The proposed changes as per 1.1.3 of the Meter Churn Procedures advises the financially responsible Market Participant is to notify the current Responsible Person in advance of the Meter Churn. It is our opinion the end to end process of how this is to occur is not clearly outlined in proposed changes. It is our assumption from reading 1.1.3 b) of the Meter Churn Procedure proposed changes, that the FMRP can raise a request for a Meter Churn and raise a CATS Change Role Notification to become RP and change relevant Metering Roles at the same time and these notifications would notify the current Responsible Person of the Meter Churn in advance. It is our view AEMO's drafting is not transparent by advising under b) 'providing the responsible person has been made aware	AEMO – The proposed date of a change request is just that, a proposed date. If the meter installation is physically performed after the proposed date the MDP would send the date of the meter installation to complete the CR 6800. This would then make all of the roles raised in that CR effective from the meter installation date and not the proposed date.
	 b) Where the financially responsible Market Participant intends to become the responsible person for the metering installation as a result of the Meter Churn, the financially responsible Market Participant must notify the current responsible person in advance of any alterations to the metering installation or change of service provision being undertaken, including: i. The proposed date of the 		It is our assumption as per the rules that the CR 1500 only has 20 business days retrospectively for a CR6800 and a CR6801 does not require a CR1500 but this is to complete overnight using the proposed date provided in the CR. The Service Level Procedures for MPB section 4.14 task 8 obligates them to schedule and undertake work (up to 10 business days), it is our expectation the MDP will have to meet the 20 business day's obligation and that the MPB abides by their obligations in the SLP. We want to avoid situations where we have raised the request for the Meter churn to occur and it	

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	change or alteration; and ii. In accordance with the requirements of the MSATS Procedures. 3.1.3 If <i>Meter Churn</i> will result in a type 5 or 6 <i>metering installation</i> becoming a type 1, 2, 3 or 4 <i>metering installation</i> , the <i>financially responsible</i> <i>Market Participant</i> must become the <i>responsible</i> <i>Market Participant</i> must become the <i>responsible</i> <i>person</i> as a result of the <i>Meter Churn</i> , unless the <i>financially responsible Market Participant</i> has requested the <i>Local Network Service</i> <i>Provider</i> to provide an offer to act as the <i>responsible person</i> and has accepted that offer in accordance with section 7.2.2 of the <i>Rules</i> .		 does not complete and we also have to withdraw our Change Role request to re-raise it again. There is some concern internally where the meter churn request may not complete. The current Meter Churn Procedure includes some high level diagrams associated with retail transfers (e.g. Meter Churn on Customer Transfer Date, Meter Churn Post Transfer Date) however AEMO is proposing to remove these maps, and it is AGL's view that the maps which have been inserted in the Service Level Procedures for Meter Data Provider Services are not sufficient replacements as they only include 'day -1 midnight of day of meter churn' and what occurs when the churn completes, they do not appear to include what needs to occur as part of organising the meter churn , role changes etc. 	
3.1.2	 Meter Churn can be initiated by the financially responsible Market Participant for the relevant market load, as recorded in MSATS, in the following circumstances: a) Where the financially responsible Market Participant does not intend to become the responsible person for the metering installation as a result of the Meter Churn, the financially responsible Market Participant may request the responsible person to perform Meter Churn in accordance with the B2B Procedures; or 		EndeavourSuggest new clause 3.1.2.c: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.Added an extra clause to reflect the scenario of	AEMO note the comments made in response to Endeavour's submission to section 1.1.3 regarding metering installation type 1-4 to 5-6 churn, AEMO note that this is covered in 1.1.2 (now 2.1.2 in draft determination).

Item/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
	 b) Where the <i>financially responsible</i> <i>Market Participant</i> intends to become the <i>responsible person</i> for the <i>metering installation</i> as a result of the Meter Churn, the <i>financially</i> <i>responsible Market Participant</i> must notify the current <i>responsible person</i> in advance of any alterations to the <i>metering installation</i> or change of service provision being undertaken, including: i. The proposed date of the change or alteration; and ii. In accordance with the requirements of the MSATS Procedures. 		a Type 1-4 to type 5 or 6 Meter Churn.	
3.1.2	 Meter Churn can be initiated by the financially responsible Market Participant for the relevant market load, as recorded in MSATS, in the following circumstances: a) Where the financially responsible Market Participant does not intend to become the responsible person for the metering installation as a result of the Meter Churn, the financially responsible Market Participant may request the responsible person to perform Meter Churn in accordance with the B2B Procedures; or b) Where the financially responsible Market Participant intends to become the 		Ausgrid There is no mention of a Type 1-4 to Type 1-4 meter churn scenario? That is, if the FRMP initiates meter churn for an existing Type 1-4 installation and wants to become the RP.	AEMO note the comments made in response to Endeavour's submission to section 1.1.3 regarding metering installation type 1-4 to 5-6 churn, AEMO note that this is covered in 1.1.2 (now 2.1.2 in draft determination).

Item/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
	 responsible person for the metering installation as a result of the Meter Churn, the financially responsible Market Participant must notify the current responsible person in advance of any alterations to the metering installation or change of service provision being undertaken, including: The proposed date of the change or alteration; and In accordance with the requirements of the MSATS Procedures 			
3.1.2	 Meter Churn can be initiated by the financially responsible Market Participant for the relevant market load, as recorded in MSATS, in the following circumstances: a) Where the financially responsible Market Participant does not intend to become the responsible person for the metering installation as a result of the Meter Churn, the financially responsible Market Participant may request the responsible person to perform Meter Churn in accordance with the B2B Procedures; or b) Where the financially responsible Market Participant intends to become the responsible person for the metering installation as a result of the Meter Churn in accordance with the B2B Procedures; or b) Where the financially responsible Market Participant intends to become the responsible person for the metering installation as a result of the Meter Churn, the financially responsible Market Participant intends to become the responsible person for the metering installation as a result of the Meter Churn, the financially responsible Market Participant must notify the 		Jemena 3.1.2 (b)—This obligation states the FRMP must notify the RP in advance. The clause does not specify the method of notification. Meter churn volumes are expected to be high when meter competition commences. JEN believes such notification must be made via agreed industry B2B processes and should be referenced in this clause.	AEMO, in consultation with the MSWG, determined that the wording reflects current industry practice, however should there be a need to change, identified either as a result of a change to the NER or via an ICF raised by a participant, the requirement to use B2B could be assessed at that time.

ltem/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
	 current <i>responsible person</i> in advance of any alterations to the <i>metering installation</i> or change of service provision being undertaken, including: The proposed date of the change or alteration; and In accordance with the requirements of the MSATS Procedures. 			
3.1.2 (b)	 b) Where the financially responsible Market Participant intends to become the responsible person for the metering installation as a result of the Meter Churn, the financially responsible Market Participant must notify the current responsible person in advance of any alterations to the metering installation or change of service provision being undertaken, including: i. The proposed date of the change or alteration; and ii. In accordance with the requirements of the MSATS Procedures. 		UE 3.1.2 (b) The FRMP must notify the current RP in advance of any alterations to the metering installation. This occurs today in low volumes by email. Is there a one way notification via B2B or an MSATS CR M2B? There needs to be a clear consistent method of the notification referred to in this clause The drafting should define the agreed process for this prior notification	AEMO, in consultation with the MSWG, determined that the wording reflects current industry practice, however should there be a need to change, identified either as a result of a change to the NER or via an ICF raised by a participant, the requirement to use B2B could be assessed at that time.
3.1.2	b) Where the <i>financially responsible</i> <i>Market Participant</i> intends to become the <i>responsible person</i> for the <i>metering installation</i> as a result of the Meter Churn, the <i>financially</i>		Energy Australia 3.1.2 b) Meter Churn needs to be in italics	 AEMO agrees, changes made as follows: b) Where the <i>financially responsible</i> Market Participant intends to become the responsible person for the metering installation

ltem/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
	 responsible Market Participant must notify the current responsible person in advance of any alterations to the metering installation or change of service provision being undertaken, including: The proposed date of the change or alteration; and In accordance with the requirements of the MSATS Procedures. 			 as a result of the <i>Meter Churn</i>, the <i>financially responsible Market Participant</i> must notify the current <i>responsible person</i> in advance of any alterations to the <i>metering installation</i> or change of service provision being undertaken, including: i. The proposed date of the change or alteration; and ii. In accordance with the requirements of the MSATS Procedures.
3.1.4	New Clause		Endeavour New clause, suggest 3.1.4: <u>Where there will be a change in Metering</u> <u>Service Provider or responsible person as a</u> 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. Added an extra clause to ensure proposed role changes are raised prior to initiating meter churn. This would allow any objections to be raised prior to changes to the metering installation. This clause goes together with the new proposed clause of 4.8.3 in the MPB SLP. Note that the change request that should be raised is a type that requires the MDP to submit	AEMO, in consultation with the MSWG, agreed. New clause added in 3.1.4 as follows: Where there will be a change in Metering Service Provider or <i>responsible person</i> as a result of <i>Meter</i> <i>Churn</i> then the <i>financially responsible</i> <i>Market Participant</i> must raise a prospective change request in MSATS nominating the role changes prior to initiating the <i>Meter Churn</i> .

ltem/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments	
			an actual change date to complete the change request. However this was not included in this new clause because this level of prescription should be in the MSATS procedure.		
3.2.1	 i. The NMI; iii. The connection point site address; <i>iv.</i> The meter serial number(s) of the meter(s) to be removed; v. The name of current <i>Metering Provider</i>; vi. The name of current <i>Metering Data Provider</i>; vii. The current <i>metering installation</i> type; and <i>viii.</i> Instructions on the 		Acumen Bullet point 2 is missing.	 AEMO agrees, changes made as follows: The NMI; The connection point site address; The meter serial number(s) of the meter(s) to be removed; The name of current Metering Provider, The name of current Metering Data Provider; The current metering installation type; and Instructions on the required changes. 	
3.2.1	Managing Meter Churn3.2.1Where there is a change in Metering Provider as a result of Meter Churn, the initiator of that Meter Churn must:	Where there is a change in Metering Provider as a result of Meter Churn, theIn this clause the FRMP or the RP? It would useful to specify the role to aid clarity when t MC changes are made. This will also assist		9	

Item/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
	 a) Ensure the metering installation is at all times, compliant with the Rules; b) Ensure that information is made available to the new Metering Provider to facilitate the Meter Churn, which must include, but is not limited to: i. The NMI; ii. The connection point site address; iv. The meter serial number(s) of the meter(s) to be removed; v. The name of current Metering Provider; vi. The name of current Metering Data Provider; vii. The current metering installation type; and viii. Instructions on the required changes. c) Ensure that the new Metering Provider operates in accordance with the requirements of the Service Level Procedure: Metering 		referred to in sub clause (b). Please clarify which role is the initiator FRMP or RP Regarding 3.2.1, there should be a need to include an obligation to ensure the initiator continues the honour existing financial obligations to pay the current Meter Service Provider(s) until the change of metering occurs. Please add an obligation for continuity of payment to current Meter Service Provider(s) until the change of metering occurs (b) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	necessity or benefit from repeating this obligation in a procedure.

Item/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
	Provider Services Category B for Metering Installation Types 1, 2, 3, 4, 5 and 6, and <i>metrology</i> <i>procedure:</i> Part A' including:			
	 The return of all removed metering equipment to the owner of that equipment; 			
	ii. The provision of the relevant official metering change documentation to the <i>Local Network Service</i> <i>Provider</i> , and			
	iii. The provision of the metering installation details to the <i>Metering Data</i> <i>Provider</i> .			
	d) Ensure that the start date for the new <i>Metering Provider</i> and new <i>Metering Data Provider</i> is:			
	i. The meter change date for an accumulation to interval meter change;			
	ii. The meter change date for an interval to interval meter change; and			
	iii. Subject to jurisdictional			

Item/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
	regulations, the meter change date + 1 day for an interval to accumulation meter change.			
	e) Where there is a change in <i>Metering Data Provider,</i> ensure the <i>metering data</i> is managed in accordance with the requirements of the Service Level Procedure: Metering Data Provider Services Category D and C for Metering Installation Types 1, 2, 3, 4, 5, 6 and 7;			
	 f) Ensure all role assignments in MSATS for the <i>connection point</i> are correct in accordance with MSATS Procedures; and 			
	g) Ensure relevant registration information is received after the field works is performed at the <i>connection point</i> by the <i>Local</i> <i>Network Service Provider</i> or <i>Metering Provider</i> .			
3.2.1	Where there is a change in <i>Metering Provider</i> as a result of <i>Meter Churn</i> , the initiator of that <i>Meter Churn</i> must:		Endeavour Change clause 3.2.1 to: Where there is a change in <i>Metering Provider</i> as	AEMO – agree amended clause reads as follows:
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Item/ D Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
			a result of Meter Churn, the initiator of that MeterChurn must:When the financially responsible MarketParticipant is the initiator of Meter Churn thenthe financially responsible Market Participantmust:Reworded to clarify that the clauses within 3.2.1applies even when there is no change in theMeter Provider e.g. clause 3.2.1.a and 3.2.1.g.Also clarifies that the obligation is on the FRMPwhen they initiate meter churn. The word'initiator' by itself was ambiguous.	3.2.1 Where a financially responsible Market Participant initiates Meter Churn and there is a change in Metering Provider as a result of the Meter Churn, the financially responsible Market Participant must:
3.2.1 b) v & vi	 v. The name of current <i>Metering Provider</i>, vi. The name of current <i>Metering Data Provider</i>, 		Endeavour Change clause 3.2.1.b.v & 3.2.1.b.vi: v. The name of <u>the</u> current <i>Metering Provider</i> <u>and their MSATS participant id</u> ; vi. The name of <u>the</u> current <i>Metering Data</i> <i>Provider</i> <u>and their MSATS participant id</u> Included the MSATS participant id because this would help with downstream processes eg when metering data needs to be sent to the new MDP.	 AEMO in consultation with the MSWG - agree with the addition of 'the' and the inclusion of MSATS participant identifiers. The amended wording reads as follows: Where there is a change in <i>Metering Provider</i> as a result of <i>Meter Churn</i>, the initiator of that <i>Meter Churn</i> must: a) Ensure the metering installation is at all times, compliant with the Rules; b) Ensure that information is made available to the new Metering Provider to facilitate the Meter Churn, which must include, but is not limited to: i. The NMI; ii. The connection point site address; <i>iii.</i> The meter serial number(s) of the meter(s) to be removed;

ltem/ Clause	Description		Category	Participant Comments	AEMO/MSWG Comments	
					iv.	The name of the current <i>Metering</i> <i>Provider</i> and their MSATS participant identifier;
					v.	The name of the current <i>Metering</i> <i>Data Provider</i> and their MSATS participant identifier;
					vi.	The current <i>metering installation</i> type; and
					vii.	Instructions on the required changes.
3.2.1 b)	New clau	ISE		Endeavour	AEMO consider that this requirement is	
ix				Added clause 3.2.1.b.ix:	covered in	3.2.1 b) vii.
				Whether the existing meter is a CT or WC meter		
				Know whether the existing metering is whole current or has current transformer would help to determine if an outage is required.		
3.2.1 & 3.2.1 b)	3.2.1	Where there is a change in Metering Provider as a result of Meter Churn, the initiator of that Meter Churn must:		UE Who is considered the initiator in this clause the FRMP or the RP. It would be useful to specify the role to aid clarity when the MC changes are made. This will also assist in clarity on which		er UE to the response to 's submission on 3.2.1 above.
	b)	Ensure that information is made available to the new Metering Provider to facilitate the Meter Churn, which		role is providing the data referred to in sub clause (b).		
		must include, but is not limited to:		b) is the initiating FRMP providing this		
	i.	The NMI;		information via B2B or is the new MP to undertake NMI discovery to retrieve the data.		
	iii.	The connection point site address;		UE note that the instructions on the required		
	iv.	The meter serial number(s) of the meter(s) to be removed;		change would most likely come from the FRMP		

Item/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments	
3.2.1c)	 v. The name of current Metering Provider; vi. The name of current Metering Data Provider; vii. The current metering installation type; and viii. Instructions on the required changes. c) Ensure that the new Metering Provider operates in accordance with the requirements of the Service Level Procedure: Metering Provider Services Category B for Metering Installation Types 1, 2, 3, 4, 5 and 6, and metrology procedure: Part A' including: The return of all removed metering equipment to the owner of that equipment; The provision of the relevant official metering change documentation to the <i>Local Network Service Provider</i>, and The provision of the metering installation details to the <i>Metering Data Provider</i>. 	Procedure only	Clarify which role is the initiator FRMP or RP Energex 3.2.1 c) ii Should this clarify that the paperwork needs to be in accorance with the LNSP's requirements?	AEMO in consultation with the MSWG – agree with intent; however this requirement is not relevant to this procedure. See task 8 in section 4.12 of the MPB SLP: All relevant registration information is received by the <i>Local Network Service Provider</i> within 2 <i>business days</i> of the field works performed at the <i>connection point</i> . AEMO – also refer to section 4.33.1 c) of the MPB SLP.	
3.2.1 c)	c) Ensure that the new <i>Metering</i> <i>Provider</i> operates in accordance with the requirements of the Service Level Procedure: Metering Provider Services Category B for		Energy Australia 3.2.1 c) Remove ' after <i>metrology procedure:</i> Part A 3.2.1 c) iii italicise metering installation	AEMO agrees and has amended the wording as follows: c) Ensure that the new <i>Metering</i>	
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ltem/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
	 Metering Installation Types 1, 2, 3, 4, 5 and 6, and <i>metrology procedure:</i> Part A' including: The return of all removed metering equipment to the owner of that equipment; The provision of the relevant official metering change documentation to the <i>Local Network Service Provider</i>, and The provision of the metering installation details to the <i>Metering Data Provider</i>. 			 Provider operates in accordance with the requirements of the Service Level Procedure: Metering Provider Services Category B for Metering Installation Types 1, 2, 3, 4, 5 and 6, and metrology procedure: Part A including: The return of all removed metering equipment to the owner of that equipment; The provision of the relevant official metering change documentation to the <i>Local Network Service Provider</i>, and The provision of the metering installation details to the <i>Metering Data Provider</i>.
3.2.1 d)	 a) Ensure that the start date for the new Metering Provider and new Metering Data Provider is: The meter change date for an accumulation to interval meter change; The meter change date for an interval to interval meter 	Procedure only	Endeavour Change clause 3.2.1.d to: Ensure that the start date for the <u>new</u> <u>Responsible Person</u> , new <i>Metering Provider</i> and new <i>Metering Data Provider</i> is: Added extra wording to clarify that this clause is also applicable to changes of the Responsible Person.	 AEMO – agrees with changes made as follows: a) Ensure that the start date for the new <i>Metering Provider</i>, new <i>Metering Data Provider</i> and where relevant the new <i>Responsible Person</i> is:

Item/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
	change; and iii. Subject to jurisdictional regulations, the meter change date + 1 day for an interval to accumulation meter change.			
3.2.1 d) ii	ii The meter change date for an interval to interval meter change; and		Acumen MDPs are supposed to have a full days data in order to com a meter change. Therefore, this should state 'the meter change date plus 1'. However, this also needs to bear in mind commercial terms (contract start dates). I.e. the MDP should be comming a transfer on install date plus 1, or the contract start date, whichever is later. Appreciate the commercial aspect is not a problem for the rules to define.	AEMO in consultation with the MSWG – MDP's do have to provide a full day's worth of data and will sub zeros for the first half of the day of meter install, according to the scenarios in MDP SLP section 8. AEMO cannot find any obligation to have a full day's worth of data in order to complete a change request.
3.2.1 d) iii	iii Subject to jurisdictional regulations, the meter change date + 1 day for an interval to accumulation meter change.		Energy Australia Subject to For jurisdictionsal regulations where reversion is permitted, the meter change date + 1 day for an interval to accumulation meter change. EnergyAustralia requests the above change to align with the wording used in the MDP SLP; this wording also provides further clarity to what regulations are being referenced.	AEMO in consultation with the MSWG – agree, changes made as follows: For jurisdictions where reversion is permitted, the meter change date + 1 day for an interval to accumulation meter change.
3.2.1 f)	f) Ensure all role assignments in MSATS for the <i>connection point</i> are correct in accordance with MSATS Procedures; and	Procedure only	Endeavour Change clause 3.2.1.f to: Ensure all role assignments in MSATS for the <i>connection point</i> are correct <u>within 2 business</u> <u>days of the meter change and</u> in accordance	AEMO – agreed in principle. Amendments made to suggested wording as follows: Ensure all role assignments in MSATS for the <i>connection point</i> are correct in accordance with MSATS Procedures, corrected within 2 <i>business days</i> of the <i>Meter Churn</i> ;

Item/ Clause	Description	Category	Participant Comments	AEMO/MSWG Comments
			with clause 3.2.1.d and the MSATS Procedures; Added extra wordings to include when MSATS must be updated and what the effective start date must be.	
3.2.1 g)	g) Ensure relevant registration information is received after the field works is performed at the connection point by the Local Network Service Provider or Metering Provider.	Procedure only	Endeavour Change clause 3.2.1.g to: Ensure relevant registration information is received by the Local Network Service Provider and Metering Service Provider within 2 business days of after the field works is performed at the connection point by the Local Network Service Provider or Metering Provider. Reworded to clarify when this action must be completed by and ensure that the LNSP, MP and MDP receive the information.	AEMO in consultation with the MSWG – agree with intent; however this requirement is not relevant to this procedure. AEMO refer Endeavour to the amendments made to Section 4.12 task no 8 in the MPB SLP. A new No 6 has been added to meet the objectives of the submission.
	Diagrams at the end of document	Procedure only	Ausnet Services The four diagrams at the end of the document need to be labelled and referenced in the relevant parts of section 3.2.1. In particular, where is the obligation to ensure the Churn Period takes less than or equal to 20 business days? If this is not clear then an obligation should be added. Please add labels to each diagram and reference the diagrams in section 3.2.1	AEMO confirms that these diagrams were deleted from the document at this stage of consultation.

Item/	Description	Category	Participant Comments	AEMO/MSWG Comments
Clause				