

13 December 2007

Dr John Tamblyn
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Dr Tamblyn,

Re: Integration of NEM Metrology Requirements – Draft Determination Response

On 30 April 2007 NEMMCO made a submission to the Australian Energy Market Commission (Commission) proposing amendments to the Rules to deliver a harmonised metrology framework for the National Electricity Market (NEM). NEMMCO appreciates the effort undertaken by the Commission in their review of the submission. NEMMCO accepts the Commission has largely adopted the proposed changes in its draft determination dated 18 October 2007 and where amendments have been made these generally improve the overall provisions.

In response to the publication of the draft determination NEMMCO makes this submission with comments contained in Attachment 1.

If you require any additional information regarding our submission please do not hesitate to contact me on 03 9648 8615 or Roy Kaplan, Manager Metrology Regulation, on 03 9648 8806.

Yours sincerely,



Mark Johnston
Head of NEM Development

Rule Change Proposal No. 1: Incorporate first tier metrology requirements into the NEM – Extend the scope of Chapter 7 of the Rules to include the metrology for all connection points in the National Grid

NEMMCO accepts the reasoning behind the Commissions amendments and supports the change.

Rule Change Proposal No. 2: Incorporate first tier metrology requirements into the NEM – Grandfathering of existing first tier requirements

Grandfathering date

Based on expected consultation timeframes NEMMCO supports the proposed effective date of 30 June 2008. As previously notified NEMMCO is conducting a concurrent Rule consultation process for the Metrology Procedure.

Under rule 7.14.1(b) the Metrology Procedure must include a minimum period of 3 months between the date the Metrology Procedure is published and the date the Metrology Procedure commences. Based on scheduled completion in March 2008 this should align with the 30 June 2008 effective date of this Rule change proposal.

However, if the Commission extends the timeframe for the final determination this may impact the Metrology Procedure consultation. If the time frame is extended, the effective date may also need to be extended beyond 30 June 2008 to take into account the requirements NEMMCO must observe under rule 7.14.1(b). NEMMCO would welcome discussions with the Commission in this circumstance to determine if an alternate effective date may be required.

Jurisdictional requirements

In relation to the Commissions proposal outlined in clause 11.X.3(c) for superseded jurisdictional requirements to be included in the Metrology Procedure, while NEMMCO understands that referencing these requirements may prove useful, incorporating the legacy requirement into the Metrology Procedure may prove problematic.

The technical standards being grandfathered are spread throughout numerous documents in each jurisdiction. There is a risk that some standards could be missed and uncertainty could be created as a result. The suggested approach would also add unnecessary volume to the NEM Metrology Procedure. Ongoing management effort would also increase.

In light of the above NEMMCO proposes that grandfathered jurisdictional requirements should be managed outside the NEM Metrology Procedure.

Non-Compliance

In response to the Commissions request for comment regarding transitional arrangements for Rules on jurisdictional non-compliant metering installations, NEMMCO proposes allowances should not be made for a meter installation to remain non-compliant. If the relevant participant becomes aware of a non-compliant metering installation(s) the participant should be required to repair or replace the metering installation to meet the relevant standards of the Rules as per the current process. This approach maintains integrity in the NEM settlement process and consumer confidence in metering arrangements.

Rule Change Proposal No. 3: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Jurisdictional Variations in the Election of the Responsible Person

Jurisdictional requirements

As noted in issue 2 above, NEMMCO believes the approach detailed in clause 11.X.4(b) for managing superseded jurisdictional requirements, would be better achieved through an alternate mechanism.

Rule Change Proposal No. 4: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Recognition of arrangements to provide facilities in addition to those normally provided by the Responsible Person

Cost arrangements

NEMMCO agrees that the Commissions' changes to Rules 7.3.1(c) and 7.3.4(e) generally maintain the intent of the provisions in NEMMCO's original submission. However, NEMMCO believes further clarification is required mainly in the area of cost management arrangements.

The new Rules (7.3.1(c) and 7.3.4(e)) do not cover the situation where the Financially Responsible Market Participant requests a meter type change from type 6 to type 5, or a different type 5 meter, when the Local Network Service Provider remains the Responsible Person. The new provisions also do not seem to address which participant pays for a request for additional functionality to that metering installation as 7.3.6(g) only references alteration. NEMMCO believes the cost provisions should be extended to clarify cost obligations under these circumstances to adequately support the new provisions.

It is also noted that clause 7.3.1(c) does reference features in "addition" to those specified in paragraph (b)". However this could be read to mean that it does not cover enhancements/variations that a party may request to components covered under paragraph (b). Further clarity could be achieved by referring to modifications and enhancements or any additional functionality added over and above the functionality specified under clause 7.3.1.

Rule Change Proposal No. 5: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Data storage capacity of Type 6 metering installations

Storage requirements

NEMMCO notes that the reference to “a period of at least 12 months” has been removed in the draft determination. While NEMMCO accepts that a type 6 metering installation does not store meter data in the same manner as a type 1-5 per se, the purpose of the phrase “include facilities to record the total accumulated energy supplied through it over a period of at least 12 months” was to ensure that the registers on the meter do not roll over more than once in one single 12 month period, which is the maximum allowable timeframes between meter reads. The impact of a meter that does roll over more than once within a single 12 month period is to make it impossible to determine the amount of accumulated energy consumed during that period from the display, effectively resulting in loss of data.

While NEMMCO believes a clause based on similar wording to the original proposal in this area offers greater clarity, some alternative wording as used in Australian Standard AS62052.11 (2005) that is consistent with the internationally agreed standards could be adopted by the Commission if preferred.

Specifically, wording similar to the following could be used: “if a type 6, include capabilities to ensure the registers are able to record and display, starting from zero, for a minimum of 1500 hours, the energy corresponding to maximum current at reference voltage and unity power factor.”

Rule Change Proposal No. 6: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Management of losses between connection point and metering point

As per NEMMCO's submission, the intention of the original proposal was to clarify the application of clause 7.3.2(b) and its practical use within industry as well as to incorporate various jurisdictional aspects. This was subsequently followed up by a supporting letter from NEMMCO.

While there appears general support for retaining proposed provisions (b), (ba) and (bb) (as per NEMMCO's original submission) there has been difficulty in determining what constitutes “materiality” as detailed in clause (bc). The purpose of clause (bc) as part of this set of provisions was to attempt to establish a threshold that ensured frivolous requests were not placed on the responsible person to undertake a review of every decision made thereby potentially turning this into a costly process.

A Metrology Reference Group (MRG)¹ meeting was held in November 2007, at which the matter of materiality was raised. Unfortunately the MRG was not able to reach a firm conclusion on this issue. However, if an alternate method could be found to address this issue and retain clauses (b), (ba) and (bb), this would provide greater clarity around the process for managing losses and retain the harmonisation achieved between the first tier and second tier requirements.

¹ The following link contains the terms of reference of the MRG
<http://www.nemmco.com.au/meteringandretail/640-0083.htm>

Attachment 1

While not the preferred option, the original 7.3.2(b) provision could be retained unchanged with further analysis to be undertaken at a later date.

Rule Change Proposal No. 7: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Metering standards for non-market generation

NEMMCO is generally supportive of the draft Rules proposed by the Commission in its draft determination.

In relation to the proposed provisions for non-market generating units, NEMMCO suggest the inclusion of an additional clause or note at S7.2.3 to indicate that in the case of metering installations for non-market generators, the provisions of S7.2.3 are modified by clause 7.3.8(i). Without such a clause, users of the Rules may anticipate that clause S7.2.3 is the sole determinant of metering installation requirements.

These provisions at 7.3.1(i) harmonise the current jurisdictional approaches, with slightly more relaxed requirements when generating units are operated at low capacity factors, such as occurs with standby equipment. The metering data from these installations is only required in the market for profile purposes and is not directly used for settlement. In any case the participants involved with each metering installation are able to obtain higher standards of metering by mutual agreement with the other participants associated with the connection point.

In relation to proposed 7.3.1(i)(8), NEMMCO suggests that improved clarity in relation to the meaning of "sent out" may be obtained by substituting for the words "...projected sent out generation; and". This alternative wording incorporates the defined term "sent out generation" and hence strengthens the meaning of "sent out" in this provision.

NEMMCO notes the request for comment from the commission in relation to the upper limit for accumulation meters and whether there should be some alignment with the jurisdictional policy positions for type 5 and 6 loads.

NEMMCO notes that the jurisdictions have not expressed policy differences that would justify the introduction of an "r" volume limit. NEMMCO suggests that a single NEM value would be satisfactory. If the Commission wishes to further explore an explicit upper energy limit for accumulation meters, NEMMCO would suggest 750 MWh/year. This is equivalent to an 8.2% capacity factor for a unit of 1MW nameplate.

Adopting 750 MWh/year as the upper limit would result in type 1, 2 and 3 metering installations being applied consistently across loads and generation above 750 MWh/year. Accumulation metering would then only be applicable to units with a nameplate less than 1MW and less than 750 MWh/year projected sent out generation.

Jurisdictional requirements

Please see NEMMCO's earlier comments for Rule Change Proposal No. 2 in regards to clause 11.X.2(c) and incorporating the superseded jurisdictional requirements into the Metrology Procedure.

Rule Change Proposal No. 8: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Process for the conduct of a participant requested meter test

Test results

NEMMCO supports the general changes made by the Commission. However, NEMMCO notes a number of matters require further clarification, in particular, the issuing of test results.

The initial proposal was attempting to distinguish between managing test results from “routine” testing and managing test results from “requested” testing.

The purpose of this change was to reduce the amount of unnecessary information flow across the industry resulting from “routine testing”. The MRG proposed that for “routine testing”, test results should be managed on an exception basis where:

- (a) test results indicate non-compliance against technical requirements; or
- (b) test results were specifically requested by a Registered Participant.

In the case of a specific “request” for a meter test to be carried out, it was seen as appropriate by the MRG that all test results, no matter the outcome of the test, should be provided to the affected Registered Participants.

NEMMCO believes this intent is missing from clauses 7.6.1(g) and (h) and should be maintained with relevant obligations on the party undertaking the test as the case may be.

Additional matter

NEMMCO would also like to note the following additional matter:

Clause 7.6.1(g)(2): Suggest replacing the phrase “NEMMCO’s connection point registration system” with “in accordance with the Market Settlement and Transfer Solution procedures” as this is more commonly used term in industry and removes any confusion.

Rule Change Proposal No. 9: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Record keeping

NEMMCO agrees that the proposals for this Rule change have largely been accepted. However in view of comments received on this matter and amendments made by the Commission, NEMMCO believes further changes could be made to help clarify the obligations and responsibilities in relation to provisions 7.9.1(f), (g), (h) and (i). This essentially stems from the difference in provisions for type 1-4 metering installations and type 5-7 metering installations in the market. The Responsible Person performs the obligations in relation to type 5-7 metering installations. NEMMCO performs the obligations through the use of agents (MDAs) for type 1-4 metering installations.

Type 1-4 and Type 5-7 differences

As raised by some participants, the implications of the original proposed provisions 7.9.1(f) and (g) place unnecessary obligations on the Responsible Person. NEMMCO notes that the Commission has attempted to clarify these obligations partly through the use of clause 7.9.1(i).

Given the current structure that exists within the NEM (and as outlined in issue 12), there is underlying differences in metrology provisions for metering installation types 1-4 and types 5-7 that need to be recognised. For this reason, NEMMCO believes greater clarity in relation to obligations in clause 7.9.1(f) and (g) would be achieved by referring to NEMMCO as the party responsible for type 1-4 metering installations and the Responsible Person as the party responsible for type 5-7 metering installations. This accurately describes where the responsibility lies in each case. NEMMCO also agrees with SP AusNet's suggestion that further clarity could be achieved by making reference between these provisions and provisions 7.9.1(f) and (g) (as per NEMMCO's original proposal)

Record keeping

NEMMCO would like to suggest a minor wording amendment to its original proposal relating to the 7 and 10 year timeframes for keeping records. NEMMCO believes this would be better stated as a minimum timeframe rather than a maximum, for example test records are kept for a minimum of 7 [or 10] years. This would reduce the possibility of conflicting requirements in the event the approved asset management strategy for a participant requires different obligations.

Rule Change Proposal No. 10: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Rights of access to metering data

Entitlement to data

In relation to the changes in the area of rights to access to data, NEMMCO would like to note the following:

Clause 7.7(a)(1): By removing reference to the MSATS procedures, B2B procedures and meter churn guidelines, uncertainty could be created in certain situations such as NMI Discovery, where a Registered Participant does not have a financial interest in the metering installation or in the energy measured at that particular point in time and the participant is still entitled to access some NMI standing data. Retaining reference to these procedures provides greater clarity and certainty to the access arrangements in situations as described that do not fit the general rule.

Clause 7.7(a)(2): It is unclear who the term "providers" is referring to in this clause, as in accordance with Rules clause 7.4.1, it is only a Metering Provider who may provide, install and maintain a metering installation.

Clause 7.7(a)(3): This clause should have referred to the "Financially Responsible Market Participants", rather than "Metering Providers" as this is the party to which meter churn guidelines relate.

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Clause 7.7(a)(8): The use of the phrase "upon request to the participant" in this clause could be confusing in relation to which "participant" is being referred to. As the customer will request this data through their FRMP, this should be stated rather than using the term "participant", that could be taken to refer to other registered participants.

Clause 7.8.2(g): Similar to the issue raised for clause 7.7(a)(8), the use of the phrase "... the participant must:" could be confusing and should refer to the identity of the actual participant being referred to.

NMI standing data

On the matter of NMI standing data, NEMMCO would like to state that it agrees with the Commissions proposal to retain NMI Standing Data as part of the provision. This removes ambiguity in this area and helps ensure relevant parties will have access to the necessary information to fulfil their obligations and roles. Further details governing access to this data are outlined in the MSATS (CATS) procedures.

Jurisdictional regulators

NEMMCO believes this a matter for comments by the jurisdictions

Rule Change Proposal No. 11: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – On-site meter testing

Alteration to metering data

NEMMCO notes the point raised by SP AusNet in relation to clause 7.8.4(b) and the use of the term "metering installation database" and "metering database".

Depending on the metering installation type, the party responsible for undertaking the substitution and maintaining the database in which metering data is adjusted will differ. If an alteration to a type 5-7 metering installation is required, this alteration would be performed by the Responsible Person in the "metering installation database", and for a type 1-4 metering installation the alteration would be performed by NEMMCO in the "metering database". NEMMCO suggests that it may be appropriate and consistent with current practice to separate clause 7.8.4(b)(2) into the different provisions to identify the parties responsible and database types based on the type of metering installation.

Further to this, as the party responsible for engaging the Metering Provider to perform the test the Responsible Person should remain responsible for ensuring the relevant party is aware of the adjustment required.

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Rule Change Proposal No. 12: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Metering databases

Metering Database and Metering Installation Database

NEMMCO notes in the draft determination, the Commission consolidated the phrase "metering installation database" and "metering database" for the purposes of continued harmonisation.

NEMMCO believes this difference in terminology should be maintained at this stage because of the current structure and arrangements that are in place in the NEM that are based on this understanding. Developments in the NEM over time have resulted in differing provisions for type 1-4 metering installations and type 5-7 metering installations, and these differences underpin many of the processes. This includes different obligations on relevant parties as well as the different storage location requirements of the metering data depending upon the metering type. The "metering database" is managed by NEMMCO for type 1-4 metering installations, and in the "metering installation database" is managed by the Responsible Person for type 5-7 metering installations.

NEMMCO believes the amendments proposed to clauses 7.9.1(h) and (i) require further analysis to fully understand and appreciate the impact of this change given its importance in the market. NEMMCO therefore proposes similar provisions to the original proposal should be incorporated, differentiating between the metering base and metering installation database according to metering installation types.

Taking into account Ergon Energy's suggestion to include a definition of metering installation database in the Rules which may help clarify the difference between metering database and metering installation database, NEMMCO suggests a definition similar to the following may be beneficial.

Metering Installation Database: A database of *metering data* collected from type 5,6 and 7 *metering installations* as established by the *responsible person* under the *metrology procedure*

Should the Commission choose to include a definition for "metering installation database" in the Rules, the use of the term in the following provisions would also require italicising. Clauses 7.3.1(a)(12) and (13), 7.3.1(b)(5), 7.9.3(b) and the definition for data logger.

NEMMCO would like to note, although it believes clause 7.9.1(i) should be deleted that the phrase "The person who is required under this Chapter 7 to collect the metering data" of the draft determination could be difficult to interpret as the person responsible for undertaking collection is the Metering Data Provider as apposed to the Responsible Person who is responsible for ensuring the data is collection services are in place.

Energy Data and Metering Data

In the original submission NEMMCO proposed to establish consistent usage of the terms "metering data" and "energy data" across the industry. NEMMCO would like to include some further clarification following additional feedback from the MRG.

The new definition of "energy data" referred to data within the meter and "metering data" to data that has been extracted from the meter, processed data, estimated data or substituted data.

Attachment 1

Based on this understanding the subsequent use of the word "energy" in the definition of metering data (for the terms "estimated energy data" and "substituted energy data") could be misunderstood to mean that substitution or estimation of data takes place within the meter. As a result, NEMMCO would like to propose the word "energy" should be removed from the definition of "metering data" when referring to substituted data and estimated data and that the term "metering installation" be replaced with "meter".

It has also been pointed out that to ensure the terminology is consistently applied, the definition of "energy data services" in the Rules should be updated to "metering data services", with the references to "energy data" in this definition replaced with "metering data".

NEMMCO also notes following these changes similar changes will be required to the Metrology Procedure to align the documents.

NEMMCO wishes to propose the following changes to the Draft Rules:

Definitions:

metering data

The data obtained from a ~~metering installation~~ meter, the processed data, estimated energy data or substituted energy data.

substituted energy data

Metering data substituted in accordance with the metrology procedure

estimated energy data

Metering data estimated in accordance with the metrology procedure

With respect to the detail in Rules change proposal no. 12 and subject to the inclusion of the definition for metering installation database, the following changes in addition to changing energy data to metering data should be made to enable the application across all metering installation types.

energy metering data services

The services that involve:

- (1) ~~collection~~ collection of ~~energy~~ metering data from the meter or meter/associated data logger;
- (2) the processing of the ~~energy~~ metering data in the ~~metering installation~~ database;
- (3) storage of the ~~energy~~ metering data in the ~~metering installation~~ database; and
- (4) the provision of access to the metering data for those parties that have rights of access to the data:

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The following provisions subsequently also require updating:

7.3.1(a)

(12) include *metering installation* database facilities for storing ~~energy~~ *metering data* for a period of at least 35 days where the *metering installation* provides for a remote *data logger*; and

(13) include *metering installation* database facilities for storing ~~energy~~ *metering data* for a period of at least 35 days where *metering data* is determined for an *unmetered connection point*.

7.14.3(a)(iii)

the provision of ~~energy~~-*metering data services*;

7.14.3(5)

in relation to type 5, 6 and 7 *metering installations* specify in what circumstances ~~energy~~ *metering data* held in *metering installations* within the relevant *participating jurisdiction*, can be used by *Distribution Network Service Providers* to calculate charges for *distribution services* for the purposes of clause 6.8.1(e); and

6.8.1(e)

~~energy metering data~~, in accordance with a *metrology procedure* that allows the *Distribution Network Service Provider* to use ~~energy metering data~~ for this purpose, or otherwise *settlements ready data* obtained from NEMMCO's *metering database*, for those *Embedded Generators*, *Market Customers* and *Second-Tier Customers* with *connection points* that have a type 5, 6 or 7 *metering installation*.

Rule Change Proposal No. 13: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Metering installation malfunctions

NEMMCO supports the Commission's draft determination for this Rule Change Proposal.

Rule Change Proposal No. 14: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Security seals

Broken seals and testing

In response to the Commission's request for further clarification in relation to clause 7.8.1(f), NEMMCO believes the current proposed provision provides enough guidance for the Responsible Person without being overly prescriptive, to ensure the metering installation is maintained to meet the relevant requirements. It should be the case in general that if it appears the metering installation no longer meets the relevant metering requirements as a result of any broken seals or some other form of unauthorised access, that the meter should be tested to ensure compliance.

Relevant standard V's relevant minimum standard

On the matter of whether the phrase in provision 7.8.1(f) should be "relevant minimum standard" or "relevant standard", NEMMCO has no objection to the use of the phrase "relevant standard". NEMMCO had no specific reason for choosing one term over the other.

Rule Change Proposal No. 15: Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Type 7 metering installations

Unmetered Loads

The main purpose of this proposal was to extend the scope of the unmetered loads provisions to recognise first tier loads and provide a framework for determining an unmetered load. The key to this proposal was the removal of the term *market load*, as it is a defined term and relates to "A load at a *connection point* the electricity relating to which is purchased other than from the *Local Retailer...*", therefore allowing loads purchased from the Local Retailer (ie first tier loads) to be incorporated.

According to NEMMCO's understanding, the removal of the term "market load" does not introduce loads that have not been declared by the jurisdiction (franchise loads) in accordance with clause 2.3.1 of the Rules.

Therefore NEMMCO recommends the removal of the reference to "market load" in the draft determination and subsequent deletion of clause S7.2.3, item 5: (b)(4)

In addition, NEMMCO would like to make a minor wording change to its original proposal by replacing the phrase "market settlement" with the defined word "settlements" so as to maintain consistent terminology.

Rule Change Proposal No. 16: Remove duplicate requirements – Data validation, substitution and estimation

NEMMCO supports the Commission's draft determination for this Rules Change Proposal.

Rule Change Proposal No. 17: Address NEM efficiencies – Incorporate Queensland's Minimalist Transition Approach to FRC in the Rules

NEMMCO supports the Commission's draft determination for this Rules Change Proposal.

Rule Change Proposal No. 18: Address NEM efficiencies – Use of a Standard Set of Terms and Conditions

NEMMCO supports the Commission's draft determination for this Rules Change Proposal.

Rule Change Proposal No. 19: Address NEM efficiencies – Time Setting

Time Setting

As per earlier comments in Rules Change Proposal No. 12 regarding the difference between "metering installation database" and "metering database" for meter types 1-4 and 5-7, clause 7.12(d) should refer to the "metering database" not "metering installation database" as it is referring to type 1-4 metering installations.

Rule Change Proposal No. 20: Address NEM efficiencies – Design Standards

Australian Standards

NEMMCO considers the Commissions proposal to include Australian Standards in the Metrology Procedure acceptable and would support this recommendation should the Commission chooses to adopt this approach.

Rule Change Proposal No. 21: Address NEM efficiencies – Recognition of International Laboratory Accreditation Cooperation (ILAC)

NEMMCO acknowledges the issue identified in the Ergon submission. For a metering provider there are efficiency benefits in permitting "robust" secondary test equipment to be used for field testing, and only require NATA/ILAC tested equipment as a primary reference for the metering provider.

Where a metering provider operates over a geographically spread area, the cost of NATA/ILAC tested equipment would tend to mitigate against providing test equipment to decentralised locations and hence the requirement for all test devices would introduce delays in getting suitable test equipment from the laboratory to the site for field testing.

The quality assurance that field test equipment has been checked against NATA/ILAC reference equipment is part of the NEMMCO accreditation and audit of metering providers.

NEMMCO agrees with the wording proposed by Ergon.

However NEMMCO notes that the location proposed by the Commission (at S7.4.3) does not fully address the issue. Clause S7.3.2 relates to the testing of equipment. Although the clause is headed "Notes (These are technical guidelines)" and are for convenience only and do not affect the interpretation of the Rules, clause S7.3.2 places requirements whenever a metering installation is tested or inspected. Therefore a failure to comply would make the installation non-compliant.

In contrast the requirement at S7.4.3(b)(5) is prefaced by linking the requirement to the capability of a metering provider and hence non-compliance relates to the accreditation (or non-accreditation) of the metering provider.

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NEMMCO holds the view that the wording of S7.3.2(b) and S7.4.3(b)(5) should be aligned however it is not adequate to make the amendment at one place (S7.4.3(b)(5)) and just delete the provision at S7.3.2(b)

Rule Change Proposal No. 22: Address NEM efficiencies – Timeframes for Inspection and Testing of Various Metering Installation Types

Asset management strategy principles

In regards to the Commissions request for comments on the matter raised by Origin Energy for NEMMCO to develop a set of requirements with respect to the asset management strategy, and for the inclusion of a set of principles in the Rules, NEMMCO would like to point out that a "metering asset management plan: information paper" is published on NEMMCO's website.

This information paper is available to industry to assist it in developing asset management plans. If industry believes this document requires further development, NEMMCO would be happy to facilitate the enhancement of the document with the assistance of industry working groups.

NEMMCO believes this guideline should not be mandated by the Rules, which would increase the urgency of this task possibly at the expense of other work already underway.

Rule Change Proposal No. 23: Address NEM efficiencies – Review of overall accuracy tables (Schedule 7.2)

Value correction

Following the changes to Table S7.2.3.2, it appears during updating of the information for 0.5 lagging (active) and 50% rated load, that the "5" was not deleted. This value should be 0.7% rather than 0.75%.

Rule Change Proposal No. 24: Address NEM efficiencies – Single table of requirements (Schedule 7.3)

NEMMCO supports the Commission's draft determination for this Rules Change Proposal

Rule Change Proposal No. 25: Address audit issue – NEMMCO Audit of Meter 'Test Results'

NEMMCO would like to suggest a minor change to the proposed words in clause 7.6.1(i). NEMMCO as part of its annual auditing function of participants undertakes a review of the metering register to ensure requirements in this area being meet. As a result NEMMCO would like to propose the following wording, and believes provides great clarity into the process.

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NEMMCO must check test results recorded in the *metering register* by undertaking annual audits of *metering installations* to satisfy itself that the accuracy of each *metering installation* complies with the requirements of this Chapter 7.

Rule Change Proposal No. 26: Address editorial changes – Editorial changes within Chapter 7

NEMMCO supports the Commission's draft determination for this Rules Change Proposal.

Additional matters

Clause 7.3.4(f)

As noted in Rule change proposal No. 10, this clause appears to be in conflict with clause 7.4.1. Clause 7.4.1 states that only a Metering Provider may install and maintain a metering installation, however clause 7.3.4(f) indicates this may be done by Local Network Service Provider. Clause 7.3.4(f) should be re-worded to state that they LNSP may only "arrange" for this alteration.

It is also unclear what is meant by the term "provider" and whom this is referring to in this clause.