

## **Master Metering Installation & Slave Metering Installation [4.1.2]**

The terms *master metering installation* and *slave metering installation* are being used across the NEM with two alternative meanings. For this reason NEMMCO introduced the terms parent metering installation and child metering installation.

In addition to the meaning for *master metering installation* included in the IPART discussion document, *master meter* is used to describe a meter that provides a communication link between an external communications system (example – PSTN connection) and a closed data connection loop to which a number of *slave meters* have been connected.

To illustrate the possibilities for confusion:

In a multi-apartment residential property, there may be a single meter for the incoming electricity supply, which is then distributed to serve apartments and common services. The apartments are also separately metered. All these meters are connected together by a fibre optic communication link, and one selected meter is connected to a dial-in arrangement through the Public Switched Telephone Network.

The meter with the incoming telecommunications connection is called the *master meter*, and all other meters are called *slave meters*. However, this meter may not be the meter used for the incoming electricity supply, and the incoming supply meter under the IPART nomenclature is called the *master metering installation*.

In addition to the above example, *master metering installation* is also used to describe the reference metering installation when duplicated metering is used, as in master/check.

NEMMCO has sought to standardise across the NEM on *Parent* and *Child* as descriptors for metering connection points where one connection point has an upstream relationship to the other. In the interests of national market convergence, NEMMCO invites IPART to move away from the use of the terms *master* and *slave* when referring to connection points and metering points, and allow them to be used unambiguously for the communication/data transfer relationships.

In dealing with the parent / child connection points (and associated metering points), it is advantageous to keep the definitions broad and general, in order to minimise the need for additional definitions or explanatory terms.

Thus NEMMCO would propose the definition – A *parent metering installation* is a metering installation for a connection point, where the energy which passes through the connection point is to be apportioned to more than one end-use customer, and that apportionment will be made through the use of one or more *child metering installation(s)* and the data from the *parent metering installation*.

## **Definition of Embedded Network [4.1.3]**

NEMMCO suggests that the definitions being proposed might be kept more encompassing, by using the definition: “Embedded Network means a distribution network supplied energy exclusively from another distribution network.”

This would enable, for example, an inset network of an LNSP supplied from a neighbouring LNSP to be managed under a single set of rules for embedded networks.

### **Responsible Person Discussions [4.1.4 & 4.1.5]**

NEMMCO has no comments to offer to this discussion at this stage.

### **Metering Requirements [4.1.6 & 4.1.7]**

NEMMCO's systems are unable to take account of the metering installation types of the parent and children connection points when a connection point registration takes place. Therefore, the obligation to verify that all other connection points are correctly registered will need to be explicitly considered and applied to the responsible person or LNSP. Further, when a prohibited metering combination is discovered, there needs to be an identified party to be held accountable for rectification.

NEMMCO's systems will settle the energy for a connection point by the method registered (Interval, MRIM, Basic, or UMCP) between the market parties registered without any reference to other connection points.

### **Access to Energy Data [4.1.8 & 4.1.9]**

NEMMCO has no comment on this proposal.

### **Standing Data [4.1.10]**

NEMMCO's only requirement is that code participants provide the Embedded Network NEMs to its systems. NEMMCO has previously nominated the embedded network local retailer (ENLR) to do this, as the closest and most appropriate code participant. The network operator within the embedded network is not part of the NEC framework and hence NEM obligations cannot be imposed on it.

### **Sample Meters [4.2]**

NEMMCO is supportive of the rationale behind this proposed change.

### **Meter Read Frequency [4.3]**

NEMMCO strongly supports the proposed change. Without the change NEMMCO may find it necessary to defer the lockdown (profile freeze) because data has not been delivered. However, the deferral of the lockdown by NEMMCO actually extends the time allowed for delivery of data.

As the lock down is not reversible, NEMMCO will try to delay the lockdown to allow the delivery of data crucial to the profile. But this 'act of grace' should not remove the measure of whether a party has delivered data to schedule.

The nature of the profile shapes used for market settlement requires that metering data is provided regularly and continuously. Data delivery on a fourteen-week cycle assumes that meters are read 3.7 times per year. In practice meter reading rounds are based on at least 4 bills (reads) per year and therefore this cycle (14 weeks) is fairly generous.

### **Tests and Inspections Requirements [4.4.1 & 4.4.2]**

NEMMCO provided some comments in relation to the equivalent clauses of the metrology procedure for Victoria. At that time NEMMCO was concerned that the new Australian Standard AS1284 part 13 had not actually been used by an electricity company for asset management of their meters. NEMMCO suggested to the Metrology Coordinator for Victoria that it may be prudent to provide some flexibility into the metrology procedures that could accommodate an unforeseen problem in the first twelve months of using the standard.

Subsequently, NEMMCO has been informed that at least one network has applied the draft standard for twelve months to its meter asset management activities with success. In view of this successful operation, NEMMCO withdraws any reservations about applying AS1284 part 13 for asset management of in-service metering. NEMMCO suggests that the proposed changes at 4.4.2 are unnecessary.

#### **Actions in the Event of Non-Compliance [4.4.3 & 4.4.4]**

NEMMCO has the view that this change is not required, because the existing Code clause 7.9.5 is available. Placing an obligation on the Responsible Person to meet an action, which is a NEMMCO responsibility in the Code, will not relieve NEMMCO of its Code obligation. If NEMMCO determines that the appropriate response differs from the Responsible Person's response, it will create a conflict.

In the past data correction has been achieved through consultation with the RP, MDP and the FRMP for the connection point. The MDP has the history, the FRMP has the customer's input and views, and the RP or LNSP is aware of historical issues. NEMMCO has the ability to see any settlement impact. The substitution procedures allow for a Type 64 (agreed method).

#### **Estimated Reads [4.5]**

NEMMCO has no comment on this proposal.

#### **Substitution Type [4.6]**

NEMMCO has no comment to the substance of the proposal.

NEMMCO observes that currently there is a NEM substitution and validation document, and separate validation and substitution rules for NSW & Victoria. This creates complexity for participants attempting to operate in multiple jurisdictions. As the three documents are substantially similar, NEMMCO would be prepared to seek convergence between these documents and manage a single document. This would make compliance simpler for participants across NSW and Victoria.

#### **Changes to Inventory Table [4.7]**

NEMMCO has no comment on this proposal.

#### **Increasing the Number of Controlled Load Profiles per Profile Area [4.8]**

NEMMCO systems are capable of implementing this change if required. However NEMMCO will require an implementation and checking period of approximately three weeks following all the required data and inputs have been completed by the LNSPs.

#### **Amending Dates for Application of Profiles [4.9]**

Changes made because of this proposal can only be implemented by NEMMCO if they are implemented consistently across the NEM.

NEMMCO does not have the capacity within current systems to implement this proposal in NSW alone, and any changes made in the NSW Metrology Procedures need to be aligned both in content and timing with similar proposed changes to the Metrology Procedures for Victoria.

NEMMCO has provided information on this matter to the Jurisdiction Implementation Group (JIG) in NSW.

NEMMCO is aware that the alternatives discussed have cost implications for all industry participants, and they have not been costed on a total industry basis. We understand that for some participants, this is a significant cost.

NEMMCO recommends that comments on process and cost implications be sought from all affected participants before a decision is made. Possibly this should be done with the aid of an industry forum on the subject to ensure that all participants understand the context of comments they may provide.