National Electricity Rule Change Proposal
Metering Dynamics Submission

Proposed Change	Impact of Change	Metering Dynamics Submission
Group 1: Incorporate and harmonise metrology requirements for first tier connection points into the NEM metrology framework		
No. 1 Extend the scope of Chapter 7 of the Rules to include the metrology for all connection points in the National Grid.		Support change
No. 2 Grandfathering of Existing First Tier Requirements		Support change
Group 2: Rule changes to harmonise current jurisdictional metrology requirements for first tier connection points with existing requirements for second tier connection points		
No. 3 Jurisdictional Variations in the Election of the Responsible Person	Rules provision for jurisdictions (through their instruments) to enable the FRMP to select the RP for first tier type 5-7 installations. Two jurisdictions currently have this variation in their procedures.	This is not seen as harmonising but enabling jurisdictional variations again.
No. 4 Recognition of arrangements to provide facilities in addition to those normally provided by the Responsible Person	Retailers can provide VAS, no change. The LNSP must not unreasonably withhold consent to a Market Participant's request to install different metering so that VAS can be provided.	Support change
No. 5 Data Storage Capacity of type 6 Metering Installations	Clarify data storage requirements for T6 metering, to record total accumulated energy of at least 12 months	None
No. 6 Management of Losses between Connection Point and Metering Point	RP must determine if losses between connection point and metering point are material and if so that they are accounted for.	None
No. 7 Metering Standards for non-market generation		None

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No. 8 Process for the conduct of a participant requested meter test	Current Rules require NEMMCO to facilitate testing of metering installations, with Jurisdictional requirements requiring the LNSP. Proposed change is that end-use customer can request through their retailer either NEMMCO or the RP to arrange testing. Affected parties may witness the tests and RP must give them 5 business days notice.	None
No. 9 Record Keeping	Test records must be kept for 7 years after the equipment is no longer in service, not just 7 years from the actual test. Metering data to be stored separately for a period of 7 years, in the form in which it was collected. Substitute data kept for 7 years.	None

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No. 10 Rights of Access to metering data – Entitlement to Metering Data.	End-use customers requiring data request it from their FRMP, if electronic access to the meter is required RP authorisation is required. Definition – *"**Entitlement**" - right granted by law or contract (especially a right to benefits)*. So changing wording from "Rights of Access" to "Entitlement" does not change the meaning or the application of this rule. **7.7 Entitlement to Metering Data** (a) The only persons entitled to receive *metering data*, *NMI standing data* or data from the *metering register* for a *metering installation* are: … (8) *A financially responsible Market Participant's customer upon request to the financially responsible Market Participant with a financial interest in the metering installation or the energy measured by that metering installation.* **7.8.2 Security controls** (ca) Subject to authorisation by the responsible person, a financially responsible Market Participant shall provide a 'read only' only password to its customer upon request. Data synchronisation issues between customer collected data and market data, due to substitution and revisions, leading to possible data/billing disputes and wasted time. This needs to be managed by FRMP/RP not the MDP.	Not supported. If end-use customers want direct access to the meter, FRMP and RP will in most cases agree, and MPB and MDP will be obliged to provide and manage a password and work around the customer's times of direct access. If the customer, their consultants or their systems, directly access the meter and do not disconnect correctly, this will lock the MDP out preventing them from meeting their market obligations. Proposed wording 7.8.2 implies that the customer has a mandated right to access the metering installation. Suggested wording below provides more control to the Market Participants responsible for reading and processing the data. **7.8.2 Security controls** (ca) Subject to authorisation by the responsible person **and MDP**, a financially responsible Market Participant ~~shall~~ **may** provide a 'read only' ~~only~~ password to its customer ~~upon request~~. Providing a 'read only' password to a **new** end–use customer would enable them to access the **previous** end-use customer's data directly from the meter, unless it was cleared at the time of transfer. Wording in the Rules should make it clear that the RP/MDP can only provide customer access to metering data for the period when the customer was legally responsible for electricity consumed at the site, or if the new customer has the consent of the previous customer.

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No. 11 On-site meter testing	If an on-site test of a metering installation requires the injection of current, the responsible person must ensure that the energy data stored in the metering installation is inspected and, if necessary, that the metering database is altered in accordance with the NEMMCO validation, substitution and estimation procedures under the metrology procedure to ensure that the metering data in the metering database is not materially different from the energy volumes flowing in the connection point during the period of the test.	None
No. 12 Metering databases	This Rules change proposal harmonises First and Second Tier requirements and brings the requirements together in the same area of the Rules for all meter types so that differences between data storage requirements are more apparent, and industry users of the Rules have all the relevant obligations at a single location.	None
No. 13 Metering installation malfunctions	This Rule change proposal will establish a harmonised approach to metering installation malfunctions across the NEM as follows: • Rectification or notification to NEMMCO within 2 days is required for a connection point with a metering installation type 1, 2 or 3. • Rectification or notification to NEMMCO within 10 days is required for a connection point with a metering installation type other than type 1, 2 or 3.	None

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No. 14 Security seals	If a Local Network Service Provider, financially responsible Market Participant, or Metering Provider discovers that a seal protecting metering equipment has been broken, it must notify the responsible person within 5 business days. The responsible person must replace a broken seal on the first occasion the metering equipment is visited to take a reading after receiving notification that a seal has been broken, or within 100 days, whichever is the earlier. The costs of replacing broken seals are to be borne: 1. by the relevant Registered Participant if the seal was broken by its customer; 2. by the Registered Participant if the seal was broken by the Registered Participant; or 3. otherwise by the responsible person. If it appears that, as a result of or in connection with the breaking of a seal, the relevant metering equipment may no longer meet the relevant minimum standard, then the responsible person must test the metering equipment.	None
No. 15 Type 7 metering installations	Minor	None
Group 3: Remove duplicate requirements within the existing Rules		
No. 16 Data validation, substitution and estimation	Minor administrative changes to assist NEMMCO	None

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Group 4 Address NEM efficiency issues identified as a consequence of the industry consultation undertaken as part of NEMMCO's Integrate First Tier Metrology project		
No. 17 Incorporate Queensland's Minimalist Transition Approach to FRC in the Rules	Minor	None
No. 18 Use of standard set of terms and conditions	Minor	None
No. 19 Time Setting	Clarifies responsibilities for ensuring time settings on different meter types.	None
No. 20 Design Standards	The proposed changes increase clarity and remove ambiguity from the specification of design standards, resulting in ease of compliance and thus improved market efficiency.	None
No. 21 Recognition of International Laboratory Accreditation Cooperation (ILAC)	The proposed solution is to recognise the certification of overseas testing laboratories which are appropriately accredited.	None
No. 22 Timeframes for inspection and testing of various metering installation types	The proposed Rules change recognises that alternate asset management strategies may be utilised, if approved by NEMMCO, to allow for innovation in maintenance programs without reducing the overall standard of performance.	Support change
No. 23 Review of Overall Accuracy Tables (Rules Schedule 7.2)		None
No. 24 Single table of requirements (Rules Schedule 7.3)	The Rules change proposes that testing uncertainty requirements that are currently split across Schedule S7.3.1 (b) and Table S7.3.1 be amalgamated into a single table.	None

Group 5 Address a metering installation audit issue identified by NEMMCO		
No. 25 NEMMCO audit of meter 'test results'	The Rules change proposes to vary the clause to put in place a more practical approach to the audit of meter tests so that NEMMCO must audit the test results and arrange for sufficient testing of meters to satisfy itself of the accuracy of metering installations.	None
Group 6 Address minor editorial changes identified when developing the change proposals above		
No. 26 Editorial changes within Chapter 7	Minor	None