

# UFE REPORTING GUIDELINES

## PROCEDURE CONSULTATION

## SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

*Participant: Alinta Energy*

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## 1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the UFE Reporting Guidelines consultation.

The changes being proposed are because of NER rule changes (3.15.5B) which have occurred, requiring the creation and changes to AEMO's Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

AEMO is required to produce Unaccounted for Energy (UFE) Trends Reports to provide information and analysis of UFE in each local area to facilitate the management and efficient decrease in UFE over time.

***In accordance with NER 3.15.5B, at least once each year, AEMO must in accordance with the UFE reporting guidelines, prepare and publish on its website a report setting out:***

- AEMO's summary and analysis of the total unaccounted for energy amounts in each local area over the reporting period
- AEMO's analysis of the unaccounted for energy amounts in each local area in the reporting period against benchmarks determined by AEMO acting reasonably;
- AEMO's analysis of the sources of unaccounted for energy in each local area;
- AEMO's recommendations to improve visibility of unaccounted for energy in each local area; and
- AEMO's recommended actions to reduce the amounts of unaccounted for energy in each local area

The creation of the UFE reporting guidelines is the subject of this consultation. AEMO considers that the content of the UFE reporting guidelines forms the basis of UFE Trends Reports, as required under the NER.

## 2. Feedback on Reporting Purpose and Scope

Description	Participant Comments
<p>AEMO intends to publish UFE Trends Reports by 1 May each year. Stakeholders are requested to accept this proposal or provide details supporting a different date for the publication of the UFE Trends Report in the future.</p>	<p>Publishing UFE Trends ahead of the end of the financial year is preferable. Alinta Energy is supportive of this timing.</p>

## 3. Feedback on Reporting UFE Analysis

Description	Participant Comments
<p>Illegal energy consumption has been identified as a source of UFE that should be ranked as top priority variable to be investigated. As there is no head of power placing an obligation on a specific party to manage the discovery of illegal energy consumption and AEMO has no visibility of illegal energy consumption, stakeholders are requested to provide details of a systematic way to discover illegal energy consumption.</p>	<p>Alinta Energy believes that identification of and responsibility to investigate illegal energy consumption is a component of UFE that needs attention. Historically, LNSPs often undertook this activity in conjunction with retailers. While we have no specific suggestions to systemically identify illegal consumption, this issue should be discussed among LNSPs/DNSPs, MCs, MPs, MDPs and FRMPs to determine a consistent method to identify this component of UFE.</p>

#### 4. Other Issues Related to Consultation Subject Matter

Description	Participant Comments
No other comments	N/A