July 2023 Retail Electricity Market Procedures Consultation

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: AGL

Submission Date: 24 Aug 2023

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1. Context

This template is to assist stakeholders in giving feedback on the content of the initial draft version of the *July 2023 REMP Consultation*.

2. Feedback on Net System Load Profile Methodology (ICF_072) discussion

Question	Participant Comments
1. Do you agree that Option 1 best achieves the desired objectives and principles? If not, why?	AGL supports Option 3 over Option 1, but recognises that Option 1 may be simpler to implement.

Question	Participant Comments
2. Do you believe an alternative methodology would better achieve the desired objectives and principles? Why? Please provide details of the alternative methodology. • The selection of an alternative methodology would likely result in a delay to the longer-term methodology being implemented, as AEMO would need to develop, analyse and test this alternative.	While AGL considers that the NSLP profile needs improvement, AGL considers that Option 1 still distorts the outcome. AGL considers that the majority of accumulation customers will still be consuming some load in the middle of the day, and hence consider Option 3 to be more representative of the expected load. AGL notes AEMO's comments regarding analysis and development, but as this proposed implementation is over 12 months away, AGL considers that this is still achievable. Regardless of which option is implemented, AGL considers that the proposed accelerated rollout of smart meters will have impacts on the NSLP processes. NSLP processes work as a result of application of a profile to a statistically large fleet of consumers. As a result of the significantly diminishing fleet of accumulations meters, AGL strongly urges AEMO to schedule some analysis for around 2028 and again potentially around 2030 (dates dependent on smart meter rollout) to mitigate unusual outcomes from the substantially smaller number of accumulation meters still in service. Noting the previously identified issue of load changes to solar sites with 5 minute data, AGL also urges some attention be paid to ensuring generation sites (Solar and battery) have 5 min meters as soon as possible.

Question	Participant Comments
3. Do you agree that the preferred methodology should not be implemented prior to October 2024 and that with the implementation of the new methodology should occur during a historically less volatile pricing period? If not, why?	AGL supports the proposed implementation of Oct 2024 – aligning with the end/start of a settlement week, again assuming that there are no significant market events in play. AGL also suggest that AEMO remind settlements managers of the proposed change from August.

3. Feedback on Substitution Type review (ICF_054) discussion

Question	Participant Comments
1. Do you agree that the proposed changes, to the substitution types and reason codes, will achieve the desired objective? In not, why?	AGL supports the proposed Substitution methods and Reason Codes. AGL also notes that there could be additional reason codes, such as: Transposed Channel, Transposed Channel - UoM Correction, Transposed Channel – Reverse Polarity and Transposed Meter to cover some of the more commonly identified situations. See appendix for details.
2. Which of the proposed implementation dates do you believe should be pursued, and why?	AGL supports the November 2024 date as the preferred date for implementation so that the benefits can be more quickly accrued.

4. Feedback on Summation Metering Changes (ICF_073) discussion

Question	Participant Comments
1. Do you agree with the proposed inclusion of the three summation arrangements? If not, why?	AGL considers that these metering arrangements are needed for complex environments with multiple entry and exit points, and sees no issue with including these cases in the metrology procedures.
2. Do you believe that an alternative approach would better achieve the desired objective?	AGL has not identified any improved / cost-effective approach.
3. Is the summation method detailed enough or should it be more prescriptive?	AGL considers that this application is quite complex and that some worked examples and clear identification of where and why metering points should be located could be included as appendix material to provide greater clarity to market participants.
4. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.	AGL has no issues with the May 2024 implementation.

5. Feedback on NMI Discovery for MCs discussion

Question	Participant Comments
1. Do you agree with the proposed change to the CATS Procedure? If not, why?	AGL supports the change to allow MCs to undertake NMI discovery as their involvement spans multiple needs for multiple participants, for multiple functions, such as: 1) Crossed Meter investigations to find out who the current FRMP/MC/MDP is for the other NMI. 2) Multi-occupancy situations where an REC is replacing a meter board and all the meters have to be replaced a NMI discovery is used to confirm the retailers the REC has provided for each NMI, or where the REC has only provided the meter serial numbers determine the NMI's and the retailers so that they can be contacted to issue SO's to a MC to have the metering works done. 3) Special projects – e.g. a Government department who is a landlord wants to install solar on houses which requires the metering to be changed (usually in rural indigenous communities) and asks the MC to help locate the retailer so they can discuss this with them because they can't get the information from the tenant. 4) Meter investigations related to 'lost meters'. This occurs when we have deployed a meter to a site, we have lost comms, attended the site and been unable to locate the meter after repeated efforts. In many cases, we find that there are one or more NMI's allocated to the address by the network and the NMI our meter is on is effectively abolished but is still 'active' in the market. We use NMI discovery to search on address which

Question	Participant Comments
	will show more than 1 Active NMI's for that address. This is common in NSW because of the ASP scheme. 5) Investigations where we have been unable to locate a legacy meter for replacement and have UTC'ed the job. Using address searches or legcy meter searches identify other NMI's that are at the same property, or where the field resource thought he was at the correct address but was obviously not. 6) Identifying Meters installed at the wrong property because the Network changed NMI addresses after the metering work was done (it happens…)
2. Do you believe that an alternative approach would better achieve the desired objective?	AGL has not identified a better approach.
3. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.	AGL: supports the proposed implementation date (or earlier).

Load Profiling Methodologies

Appendix I – Additional Reason Codes

Reason Code	Reason Code Description	Detailed Description
90	Transposed Channel	For use when meter data streams have been transposed (e.g. TOU with Controlled load).
91	Transposed Channel - UoM Correction	For use when data channels have been transposed (eg KWH with KVARH);
92	Transposed Channel – Reverse Polarity	For use when meter has been wired in reverse from install or where reverse polarity alarm occurs effectively swapping registration between export and import registers
93	Transposed Meter	For use when correcting data as a result of crossed meters