

JULY 2023 REMP CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

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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 July 2023 REMP consultation.

The changes being proposed are due to three ICF's raised through the ERCF and an AEMO proposed change, resulting to changes to AEMO's Retail Electricity Market Procedures to implement the recommended process improvements.

2. Meter Data File Format Specification NEM12 & NEM13

Section	Description	Participant Comments
3.3.5	Reason Code	<p>With more reason codes added it should be made clear that there is no obligation on the MDP to create a new version of metering data, with the same consumption and profile as the current version of metering data, just to update the reason code.</p> <p>We suggest updating clause of 3.3.5.a as follow:</p> <p>The MDP must apply the ReasonCode that most accurately reflects the reason for supplying the code or based on the hierarchical structure agreed with the FRMP at the time the metering data was substituted. For avoidance of any doubt, there is no obligation on the MDP to create a new version of metering data just to update the ReasonCode.</p>

Section	Description	Participant Comments
Appendix E. Reason codes	Addition of Incorrect Meter Multiplier	
Appendix E. Reason codes	Addition of Temporarily Connection Point unmetered	
Appendix E. Reason codes	Addition of Customer By-Pass	
Appendix E. Reason codes	Addition of Network By-Pass	
Appendix E. Reason codes	Addition of Transposed Channel	
Appendix E. Reason codes	Addition of Transposed Channel - UoM Correction	
Appendix E. Reason codes	Addition of Transposed Channel – Reverse Polarity	
Appendix E. Reason codes	Addition of Transposed Meter	
Appendix E. Reason codes	Addition of Network by-pass extreme weather	
Appendix E. Reason codes	Addition of Defined load method	<p>The description does not read well. We suggest adding the word 'provides' as suggested below:</p> <p>For use where Retailer/LNSP provides profile data based on off-market meter or other measured data that best represents the connection point load.</p>

3. Metrology Part A

Section	Description	Participant Comments
5.2 New Metering Installation Summation Arrangements	Addition of new section	
2.3 Summation Method	Addition of new section	

4. Metrology Procedure Part B

Section	Description	Participant Comments
2.6 Summary table of Substitution	Edited to include: <ul style="list-style-type: none"> • Rewording of type 14, type 15 and type 20 • Obsolescence of type 16 • Addition of new substitution types 22,23,24,25. 	
3.2 Substitution types	Edit of substitution types in (f) Addition of (g) (i) and (ii)	<p>We note the words ‘MDPs may change the quality flag to an existing type 16 or 18 Substitution without seeking further agreement from those parties’ has been removed from clause 3.2.g. We suggest that this be re-instated without reference to type 16 because once agreement is obtained then subsequently changing the quality flag should not require the manual process of seeking agreement again.</p> <p>We suggest adding an additional sentence to the end of clause 3.2.g.ii as follow:</p> <p>For Type 18, the party initiating a change in metering data must consult with the MDP and use reasonable endeavours to reach an agreement with the affected FRMP(s), ENLR (where appropriate) and the LNSP for the connection point. Should the affected participants not respond within 2 business days, then the proposal will be taken as accepted until further communication is undertaken. MDPs may change the quality flag to an existing type 18 Substitution without seeking further agreement.</p>

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3.3.4 Type 14 – Like Day	Rewording to Type 14 – Retrospective Like Day	
3.3.5 Type 15 – Average Like Day	Reworded to Type 15 – Retrospective Average Like Day	
3.3.6 Type 16 – Agreed Method	Reworded to obsolete Type 16 – Agreed Method	
3.3.8 Type 18 – Alternative	Reference for 3.2 (g)(ii) added Addition of (d)	
3.3.10 Type 20 – Churn Correction	Rewording to Type 20 – Prospective Like Day Use definition edited	Table 3 is referenced by Type 20 and Type 23, with Type 20 now allowing for scenarios that is not related to a meter churn and Type 23 also allowing for scenarios that is not related to a meter churn. However, table 3 still describes the approach using the term ‘Churn Day’. For avoidance of confusion, we suggest the term ‘Churn Day’ in table 3 be replaced with ‘Substitution Day’ (similar to the approach described in table 1).
3.3.12 Type 22 – Prospective Average Like Day	New Substitution definition added Addition of table 4	
3.3.13 Type 23 – Previous Year	New Substitution definition added	
3.3.14 Type 24 – Data Scaling	New Substitution definition added	
3.3.15 Type 25 - ADL	New Substitution definition added	We note this substitution type has a criterion of ‘Where no other option is available’ which suggests that this option should only be used where other options have been exhausted. We believe this criterion should be removed and instead allow the MDP to

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		<p>determine when this substitution type should be used. For example, an ADL based on the customer's profile (type 25) may be better than the previous year data (type 23) if the customer recently installed solar. Given the FRMP or LNSP may request the MDP to change the substitution if it is not appropriate then we believe it is in the MDP's interest to choose the most appropriate substitution type the first time. Leaving the criterion as is for type 25 would restrict the MDP from choosing the most appropriate substitution type.</p> <p>We suggest the description for type 25 be updated to:</p> <p>To perform a type 25 Substitution, the substituted period is calculated based on Average Daily Load which may or may not be profiled.</p>
11.2.1 NSW	Reference amended to 12.9.2	
11.2.2 Queensland	Reference amended to 12.9.2	
11.2.3 South Australia	Reference amended to 12.9.2	
11.3.1 NSW & Queensland	Reference amended to 12.9.2	
11.3.2 South Australia	Reference amended to 12.9.2	
11.4.1 Net System Load Profile	Reference amended to 12.9.2	
11.4.2 Floor Value	Addition of new section in respect to the NSLP	

11.4.3 NSLP TI values below floor value	Addition of new section in respect to the NSLP	
11.5 Accumulation Meter Profiler – Net System Load Profile	Amended of reference to 12.9.2 in (a) Amended of reference to 11.4 in (c)	

5. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
16.2 Participant	Rewording of (g).ii	<p>We understand that clause 7.15.5 of the NER allows the current MC and previous MC access to NMI stand data. Therefore we suggest clause 16.2.g.ii be updated to include the previous MC, we suggest the following wording:</p> <p>An MC must only carry out an MC Standing Data Search on NMIs where they are the Current MC or the Previous MC.</p>
16.2 Participant	Removal of (h)	<p>We are disappointed with the proposal to remove the MC NMI Discovery unless we are the current or previous MC for the NMI because this hinders our ability to operate effectively when providing services to customers and retailers.</p> <p>We note AEMO’s decision for the draft determination is based on aligning the MSATS Procedure with the Rules which we do understand although it is not the outcome that best support customers and the industry.</p>

		We also note AEMO agrees that there are valid use cases where NMI Discovery should be provided to a MC who is not the current or previous MC for the NMI and have made submissions to the AEMC to allow for this. We encourage AEMO to further engage with the AEMC to highlight the industry issue and to advocate providing expanded NMI Discovery access to the MC.
16.2 Participant	Rewording of (i) Removal of (i) (ii)	

6. Service Level Procedure Embedded Network Manager Service

Section	Description	Participant Comments
4.2.1 Overview	Removal of (f)	

7. Additional Feedback

Participant Comments
With regards to the effective start date for ICF_054 (substitution and reason code changes), AEMO acknowledged that 5 participants supported November 2024 and 4 participants supported May 2025 due to ‘...the volume of system changes already scheduled for 2024 and associated resourcing constraints’. AEMO then considered an effective start date of 4 November 2024 would result in several changes to Participant obligations in quick succession and in the end stated that ‘AEMO agrees with most respondents that the effective date should be 29 September 2024’.

While we acknowledge that deciding on the effective start date based on the number of respondents supporting a particular date is a simply quantitative approach, we believe this approach does not consider or address the concerns raised about the volume of system changes already scheduled for 2024 and associated resourcing constraints. We request AEMO reconsiders the effective start date and take into account the impact on participants, for example Energy Queensland, who strongly prefer May 2025 due to resourcing constraints, is considered as one respondent however this respondent represents three participants (Ergon Energy, Energex and Yurika Metering). Another consideration is the participant type, for example this change will impact on MDPs more than other participants therefore feedback from MDPs should be given more weighting.

We believe that May 2025 is a reasonable date, given it was put forward as an option, and this date addresses the concerns of the volume of system changes already scheduled for 2024 and associated resourcing constraints.