

METERING INSTALLATION EXEMPTION AUTOMATION CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: United Energy

Submission Date: 13 July 2023

Table of Contents

1. Context	3
2. Exemption Procedure (Metering Installation Malfunctions)	3
3. Metering Exemption (Small Customer Metering Installation)	5
4. Metering Installation Exemption Guideline (New Document)	7
5. Retail Electricity Market Procedures – Glossary and Framework	13

1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the metering installation exemption automation consultation.

2. Exemption Procedure (Metering Installation Malfunctions)

Section	Description	Participant Comments
1.4 Metering Exemption Framework	Added a new section to note that the procedure may change subject to the changes to the Metering Exemption Framework which might be made in the NER	No comment
1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	No comment
2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	No comment
2.3 AEMO's Determination	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption process will be two steps process.</p>	No comment

Section	Description	Participant Comments
2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	No comment
2.6 Application Unsuccessful	deleted the following point: (a) A failure to complete the application form;	No comment
2.7 Extension to Exemption	Deleted reference to Appendix B. Added a new section about AEMO's notification of expiring exemptions and the process of extension.	No comment
2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	No comment
2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	No comment
2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	No comment

Section	Description	Participant Comments
3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	No comment
3.2 Contents	Added a new section on the MDP action plan	No comment
Appendix A. Application for Exemption	Deleted Appendix A	No comment
Appendix B. Application for Extension	Deleted Appendix B	No comment

3. Metering Exemption (Small Customer Metering Installation)

Section	Description	Participant Comments
1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	United Energy acknowledges and agrees with AEMO's response to our position as per Table 3 Item 2 of this consultation's Draft Determination Report published 16 June 2023.
2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	No comment

Section	Description	Participant Comments
3.2 Form of Application	Updated section to reflect the new automated exemption process	No comment
3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	No comment
3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	No comment
3.7 Current MC's Obligations during the Exemption Period	Updated point 3.7(b) to advise that exemptions can't be extended.	No comment
4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	No comment
4.3 Change in Circumstances	Deleted reference to Appendix A	No comment
Appendix A. Application for Exemption	Deleted Appendix A	No comment


4. Metering Installation Exemption Guideline (New Document)


Section	Participant Comments
3. Application process	
3.1 Generally	No comment
3.2 Responsibility	No comment
3.3 Supporting Information to support Application	No comment
4. Creation and Management of an Application	
4.1 Exemption life cycle	<p>Section 4.1 states that each exemption may contain between 1 to 100,000 NMIs that are of the same Exemption category, Exemption type and Nature of exemption. When AEMO approves an exemption with a large number of NMIs and notifies the participants that the exemption has been approved, it is expected that AEMO will send eligible participants a CATS Notification for every NMI in the exemption, with these notifications appearing in participants' OutBox. Approval of exemptions that contain large numbers of NMIs has the potential to flood the market and potentially generate Stop Files (if participants cannot process these notifications quickly enough).</p> <p>United Energy queries if such exemption approval notifications will be throttled so as to avoid Stop Files?</p>
4.2 Navigation to exemptions	No comment
4.3 Exemption list	No comment
4.4 Creating a new exemption	No comment

Section	Participant Comments
4.5 Reviewing an exemption	No comment
4.6 Providing more information	No comment
4.7 Managing an exemption	No comment
4.8 Viewing closed exemptions	No comment
4.9 Exemption notifications	<p>United Energy identifies four items as follows:</p> <ol style="list-style-type: none"> 1. United Energy notes that as part of the Meter Exemptions Consultation, 4 new SDQ reports are defined as per the following screen print:

Section	Participant Comments
	<div data-bbox="517 300 1413 1090" style="border: 1px solid gray; padding: 10px;"> <p>4.9. Exemption notifications</p> <p>Letters and correspondence will not be sent for metering exemptions in this automated process. It is the participants responsibility to monitor and manage the exemption progress.</p> <p>However new Standing Data Quality (SDQ) checks will be included into the weekly reporting to Metering Co-ordinators, The SDQ checks will be:</p> <ul style="list-style-type: none"> • ME_EXPIRE_SOON <ul style="list-style-type: none"> ○ Description: Identifies metering exemptions due to expire in the next 2144 calendar days ○ Header details: ParticipantID, RoleID, ExemptionID, sdr_key_2, sdr_key_3, Exemption_Start_Date, Exemption_End_Date, Status, Category, Type, Nature, NMI_Qt • ME_EXPIRED <ul style="list-style-type: none"> ○ Description: identifies metering exemptions that have reached the expiryend date and have been updated to expired ○ Header details: ParticipantID, RoleID, ExemptionID, sdr_key_2, sdr_key_3, Exemption_Start_Date, Exemption_End_Date, Status, Category, Type, Nature, NMI_Qt • ME_MC_CHURN <ul style="list-style-type: none"> ○ Description: NMI assigned to an Exemption has changed MC and is no longer exempt. ○ Header details: QueryId, Stat_Date, ParticipantId, RoleId, Source, Table, NMI_ID, ME_ID, Sdr_Key_3, Start_Date, End_Date, Field, ME_Status, Category, Type, Nature, Old_MC • ME_T4A_REVIEW <ul style="list-style-type: none"> ○ Notify the Metering Co-ordinator when an exemption with an Exemption category of Type 4A has been Approved or Rejected ○ QueryId, Stat_Date, ParticipantId, RoleId, Source, Table, NMI_ID, ME_ID, Sdr_Key_3, Start_Date, End_Date, Field, ME_Status, Category, Type, Nature, Old_MC </div> <p>The way the SDQ reports have been described in the document is not consistent with the standard SDQ format e.g. each SDQ report contains a QueryID (as per the red highlighted reports above), whereas in the ME_EXPIRE_SOON & ME_EXPIRED reports, the QueryId is missing.</p> <hr/> <p>2. The last paragraph of section 4.9 in the METERING EXEMPTIONS GUIDELINE says the following:</p>

Section	Participant Comments					
	<div data-bbox="517 304 1637 432" style="border: 1px solid gray; padding: 5px; margin-bottom: 10px;"> <p>Upon resolution or cancellation of a <u>metering installation malfunction</u> exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101 has completed. This notification will remove the <u>metering installation malfunction</u> exemption number and expiry date.</p> </div> <p>In the Draft Determination feedback (Table 4, Item 89), it states “AEMO notes that the field names will be there but with no data as per standard xml format”.</p> <p>United Energy recommends AEMO include this feedback into the above paragraph of the Guideline and provide a sample CR5101 xml for a cancelled/resolved exemption.</p> <hr/> <p>3. United Energy queries if an extension to an exemption is requested, will the MC & other participants be notified (via a CR5101) with a new Expiry Date when the extension is approved. If the extension is not approved, what notification will AEMO send to the participants?</p> <hr/> <p>4. Part of the consultation feedback published in the Draft Determination on 16 June 2023, that the CR5101 for removal of MME (cancelled/resolved), the field names will be provided but with no data:</p> <div data-bbox="517 1002 2069 1114" style="border: 1px solid gray; padding: 5px; margin-bottom: 10px;"> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; text-align: center; background-color: #e0e0e0;">89</td> <td style="width: 25%; padding: 2px;">4.9 Exemption notifications</td> <td style="width: 25%; padding: 2px;">CitiPower Powercor</td> <td style="width: 45%; padding: 2px;">CitiPower Powercor would like clarification on the paragraph relating to “Upon resolution or cancellation of an exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101</td> <td style="width: 10%; padding: 2px; background-color: #ffff00;">AEMO notes that the field names will be there but with no data as per standard xml format.</td> </tr> </table> </div> <p>However, the schema ElectricityMasterStandingData_r43.xsd does not seem to allow for a null MeterMalfunctionExpiryDate (this may be an oversight in the schema)...</p>	89	4.9 Exemption notifications	CitiPower Powercor	CitiPower Powercor would like clarification on the paragraph relating to “Upon resolution or cancellation of an exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101	AEMO notes that the field names will be there but with no data as per standard xml format.
89	4.9 Exemption notifications	CitiPower Powercor	CitiPower Powercor would like clarification on the paragraph relating to “Upon resolution or cancellation of an exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101	AEMO notes that the field names will be there but with no data as per standard xml format.		

Section	Participant Comments
	<pre> </xsd:documentation> </xsd:annotation> <xsd:group name="ElectricityNMI MasterGroup"> <xsd:annotation> <xsd:documentation> Purpose - Common NMI Master elements across Standing Data and Change Requests </xsd:documentation> </xsd:annotation> <xsd:sequence> . . . <xsd:element name="MeterMalfunctionExemptionNumber" type="MeterMalfunctionExemptionNumber" nillable="true" minOccurs="0"/> <xsd:element name="MeterMalfunctionExemptionExpiryDate" type="xsd:date" minOccurs="0"/> . . . </xsd:sequence> </xsd:group> <xsd:complexType name="ElectricityMasterStandingData"> <xsd:annotation> <xsd:documentation> Purpose - container for non-repeating standing data associated with an electricity NMI </xsd:documentation> </xsd:annotation> <xsd:sequence> . . . <xsd:element name="MeterMalfunctionExemptionNumber" type="MeterMalfunctionExemptionNumber" nillable="true" minOccurs="0"/> <xsd:element name="MeterMalfunctionExemptionExpiryDate" type="xsd:date" nillable="true" minOccurs="0"/> . . . </xsd:sequence> </xsd:complexType> </pre>  <p>A sample CR5101 xml gives the following (schema validation) error when NOT populating the expiry date:</p>

Section	Participant Comments
	 <p>The screenshot shows an XML document with the following structure:</p> <pre> <?xml version="1.0"?> <ase:aseXML xmlns:ase="urn:aseXML:r43" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xsi:schemaLocation="urn:aseXML:r43 http://www.nemmco.com.au/aseXML/schemas/r43/aseXML_r43.xsd"> <Header> <From>NEMMCO</From> <To>UNITED</To> <MessageID>NEMMCO-MSG-11234569</MessageID> <MessageDate>2001-10-31T13:20:10.000+10:00</MessageDate> <TransactionGroup>CATS</TransactionGroup> <Priority>Medium</Priority> <SecurityContext>NEMMCOBATCH</SecurityContext> <Market>NEM</Market> </Header> <Transactions> <Transaction transactionID="NEMMCO-TNS-12348990" transactionDate="2001-10-31T13:20:09.900+10:00"> <CATSNotification> <Role>LNSP</Role> <RoleStatus>C</RoleStatus> <ChangeRequest> <Participant>NEMMCO</Participant> <RequestID>1136314044</RequestID> <ChangeStatusCode>CCM</ChangeStatusCode> <ChangeData> <ChangeReasonCode>5101</ChangeReasonCode> <ActualChangeDate>2020-05-18</ActualChangeDate> <NMIStandingData xsi:type="ase:ElectricityStandingData"> <NMI checksum="2">6407294473</NMI> <MasterData> <MeterMalfunctionExemptionNumber></MeterMalfunctionExemptionNumber> <MeterMalfunctionExemptionExpiryDate></MeterMalfunctionExemptionExpiryDate> </MasterData> </NMIStandingData> </ChangeData> </ChangeRequest> </CATSNotification> </Transaction> </Transactions> </ase:aseXML> </pre> <p>The error message is: "Error parsing '' as date datatype. The element 'MeterMalfunctionExemptionExpiryDate' with value '' failed to parse."</p>
<p>4.10 Transition of existing exemptions</p>	<p>Table 4, Item 96 in the Draft Determination states “AEMO notes that participants will receive all CR5101 notifications as per the MSATS CATS procedure at transition of existing exemptions”.</p> <p>United Energy requests that this feedback be included in section 4.10 of the Guideline.</p>

Section	Participant Comments
4.11 CSV formats	No comment
4.12 API Navigation	No comment
5.Appendix A	No comment
6.Appendix B	No comment

5. Retail Electricity Market Procedures – Glossary and Framework

Section	Description	Participant Comments
4.4.5 Metering Installation Exemption Guideline	Added new Metering Installation Exemption Guideline document	<p>United Energy recommends applying consistency to the name of the guideline across various communication channels. For example:</p> <ul style="list-style-type: none"> The Guideline document is titled ‘Meter Exemptions Guideline’ Document links on consultation webpage https://aemo.com.au/consultations/current-and-closed-consultations/metering-installation-exemption-automation-consultation refer to the Guideline document as the ‘Metering Installation Exemption Guideline’