

# METERING INSTALLATION EXEMPTION AUTOMATION 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 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	Noted
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	Noted
2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	AGL Supports the change
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>	Noted; although AGL considers that the additions are complex and those relating to system processes (which are information in nature) should be separated from clauses relating to obligations placed on parties.

Section	Description	Participant Comments
2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	<p>Noted, although given the importance of the clause, further clarification may be warranted:</p> <p>An exemption granted by AEMO will commence on the date that AEMO received the application via MSATS <del>and</del> <u>or the date that AEMO has received the</u> completed supporting documentation (if required) via the email process, <del>-(whichever is the greater)</del> <u>later</u>.</p> <p>Note, this clause may also be inconsistent with CI 3.4 of the Exemption Guidelines, small customers.</p>
2.6 Application Unsuccessful	<p>deleted the following point:</p> <p>(a) A failure to complete the application form;</p>	Noted
2.7 Extension to Exemption	<p>Deleted reference to Appendix B.</p> <p>Added a new section about AEMO's notification of expiring exemptions and the process of extension.</p>	Noted
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.	Noted

Section	Description	Participant Comments
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	Noted
2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	<p>Noted.</p> <p>Although an explanation of why the exemption may not be closed or expired would assist understanding.</p>
3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	<p>Noted.</p> <p>Given that MDP processes are governed by the metrology procedure, it is expected that the consistent response to 3.1 ii will most likely be ‘Substitute data in accordance with the metrology procedures.’ As such, this is unlikely to be a useful or relevant piece of information but will meet the requirements of this clause.</p> <p>AGL suggests that AEMO consider what would be useful other than the statement on substitution, and if there is nothing else, make the obligation optional or required only for Types 1-3 meters. AGL does not consider this of value for types 4 to 6 meters relevant given the substitution is part of the meter data stream.</p>

Section	Description	Participant Comments
3.2 Contents	Added a new section on the MDP action plan	<p>Noted.</p> <p>Again, AGL questions the value of this. Whatever proposed substitution method is chosen, can be changed by the FRMP/LNSP/ENLR. Further, the options for substitution may change over time or as other data becomes available, rendering this initial information irrelevant.</p> <p>The period substitutions are to be used is generally outside the control of the MDP (and sometimes the MP) if customer equipment (eg VT/CTs) are required to be purchased or imported.</p> <p>The details of the substitutions are provided in the NEM12 or NEM 13 file and are scrutinised by the relevant participants who may request changes to those processes.</p> <p>Further, if the meters which are being submitted for exemption are DB meters, there is less interaction between contestable MCs and Regulated MDPs.</p> <p>Finally, AGL does not consider the benefits of requiring MCs to provide this information for the majority of applications (ie types 4-6 meters) is worthwhile, and the imposition of this requirement does not meet the cost-benefit for which it may be used.</p> <p>AGL proposes that this only be applied to requests for Types 1-3 meters.</p>
Appendix A. Application for Exemption	Deleted Appendix A	Noted.

Section	Description	Participant Comments
Appendix B. Application for Extension	Deleted Appendix B	Noted.

### 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	Noted
2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	Noted
3.2 Form of Application	Updated section to reflect the new automated exemption process	Noted
3.4	<a href="#">Exemption date</a>	AGL questions whether the application of the exemption date as of the installation date is inconsistent with Clause 2.5 of the Exemption Procedure, and CI 2.5 needs modification.
3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	The majority of this clause seems to be a repeat of the material in the Exemption Procedure. As such, there may be risk of inconsistencies between the two documents.
3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	The majority of this clause seems to be a repeat of the material in the Exemption Procedure. As such, there may be risk of inconsistencies between the two documents.
3.7 Current MC's Obligations during the Exemption Period	Updated point 3.7(b) to advise that exemptions can't be extended.	Noted



Section	Description	Participant Comments
4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	<p>...requires the exemption to continue...a new exemption application</p> <p>Suggest a re-write as the exemption is not continuing, but a new exemption is being issued to replace one which has ended, due to the change in MC.</p>
4.3 Change in Circumstances	Deleted reference to Appendix A	Noted
Appendix A. Application for Exemption	Deleted Appendix A	Noted

## 4. Metering Installation Exemption Guideline (New Document)

Section	Participant Comments
3. Application process	
3.1 Generally	AGL queries whether all exemption requests have agreed dates ?  If not, suggest delete the word 'agreed'
3.2 Responsibility	Noted
3.3 Supporting Information to support Application	Noted
4. Creation and Management of an Application	
General	Screen shots still very low resolution and need to be enhanced.
4.1 Exemption life cycle	Noted
4.2 Navigation to exemptions	Noted
4.3 Exemption list	Noted
4.4 Creating a new exemption	Noted

Section	Participant Comments
4.5 Reviewing an exemption	Noted
4.6 Providing more information	Noted
4.7 Managing an exemption	<p>C L 4.7.2 indicates AEMO will notify Participants 21 <b>days</b> prior to the exemption expiry date.</p> <p>CI 3.7(b) of the Exemption Guideline indicates that AEMO will notify participants 30 <b>business days</b> prior to an exemption expiring.</p> <p>Is the notification in CI 4.7.2 another notification ?</p> <p>Also note the lack of consistency between days and business days in these documents.</p>
4.8 Viewing closed exemptions	If an exemption is incorrectly closed, will an MC have to re-submit all information again, or can AEMO reverse the closure ?
4.9 Exemption notifications	Noted (inc 21 calendar day notifications)
4.10 Transition of existing exemptions	Noted
4.11 CSV formats	Noted
4.12 API Navigation	Noted

Section	Participant Comments
5.Appendix A	Noted
6.Appendix B	Noted

### 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	Noted