

METERING INSTALLATION EXEMPTION AUTOMATION CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

Submission Date: 17 Jul 23

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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	
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	
2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	
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>	

Section	Description	Participant Comments
2.3(b)(ii)		<p>Editorial:</p> <p>* There are words missing to complete the syntax in the sentence below.</p> <p>When all required information has been provided, * approve or reject the application and advise the Metering Coordinator via the MSATS system.</p> <p>PLUS ES suggests the inclusion of ... AEMO will... for completeness.</p>
2.4 Matters taken into Consideration	Clause (b)	<p>(b) The nature of the metering installation malfunction and whether it was caused by a breach of the NER by the Current MC.</p> <p>PLUS ES proposes AEMO reviews this clause and rewords accordingly for clarity. It is not clear how a current MC could cause a metering malfunction by a breach of the NER and how to apply this requirement.</p>
2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	<p>PLUS ES notes concern that the following, would have the MC in breach of the NER, though they have remained compliant to their requirements.</p> <ul style="list-style-type: none"> • The Exemption commencement date is the date on which AEMO receives all required documents and • The proposed extended AEMO timeframes to process an exemption application. <p>For example, the MC discovers on day 13 that the metering malfunction cannot be resolved by day 15. The MC submits an exemption application on day 13, AEMO has given an exemption ID and AEMO has until day 23 to ask for additional information. Even if the MC responded with additional information on the same day, and AEMO reviewed the information on the 10th business day (day 33) - which they are allowed to do as per the draft</p>

Section	Description	Participant Comments
		<p>procedure - if approved, the exemption would be granted on day 33 and only back dated to day 23 - which would mean that <u>the MC would be in breach of the Rules from day 15 to day 23.</u></p> <p>We also note AEMO's comment to feedback provided in the earlier submission - AEMO notes that the exemption starts from the date AEMO receives all required documents, and that the exemption approval date will be visible for audit processes along with the exemption application date.</p> <p>PLUS ES supports this approach also creates greater administrative effort during auditing, creates additional effort from participants to manage their compliance performance and respond to metering installation status enquiries. Remembering that in addition to NER and AEMO obligations, bilateral commercial agreements may have additional requirements.</p> <p>For market efficiency and due to the MC compliance implications PLUS ES proposes AEMO reconsiders the Exemption commencement date to be the date the application was received. (Without the additional criteria of all relevant documents are received.)</p>
2.6 Application Unsuccessful	<p>deleted the following point:</p> <p>(a) A failure to complete the application form;</p>	
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>	<p>PLUS ES notes AEMO's comment to our previous submission that the timeframe has been increased to 21 business days.</p> <p>The Procedure has 21 days not 21 business days.</p> <p>The word business needs to be added.</p>

Section	Description	Participant Comments
	Expiration of extensions	<p>AEMO has noted against our comment in the previous submission:</p> <p>AEMO notes that a submitted extension application which has not been <u>actioned</u> by the expiry date, will trigger the exemption to be expired.</p> <p>The Procedure notes:</p> <p>If exemption extensions are not submitted prior to the expiry date, then the exemption will be updated to Expired.</p> <p>PLUS ES seeks clarification with respect to timings which will cause an extension to be expired, i.e. actioned vs submitted. For efficiency, we recommend that applications that have been submitted in time should not be expired.</p>
	Submission of extension timeframe prior to expiration.	<p>The Procedure notes:</p> <ul style="list-style-type: none"> • any application for an extension must be submitted to AEMO at <u>least seven</u> days prior to the expiry of the exemption and • clause 2.3 (b) states: <u>Within 10 business days of receipt of an application for exemption or extension</u> <p>PLUS ES proposes the following for efficiency by mitigating expired exemptions:</p> <ul style="list-style-type: none"> • Timeframes between clauses and obligations are reviewed to support each other. • Consistency in the timeframe measurements – days vs business days. <p>For example, if the expiry date is 12/7:</p>

Section	Description	Participant Comments
		<ul style="list-style-type: none"> • 10 business days – the MC must submit the application on or prior to the 28/6 to be processed. • But if they are required to submit at least 7 days (by the 5/7), what is the outcome of the extension application if AEMO has 10 business days to review and approve?
2.8 Current MC’s Obligations during the Exemption Period	Clause (b)	<p>From experience and an efficiency perspective, PLUS ES supports the removal of this clause in its entirety from an efficiency perspective. We also note AEMO’s comments about obligations need to remain and propose an alternative:</p> <p>Clause (b):</p> <ul style="list-style-type: none"> • When requested, within 2 business days, provide an affected Participant a copy of the MP’s rectification plan or alternatively, • Within 2 business days, provide all affected Participants with a copy of the MP’s rectification plan for LVCT and HV metering. (Similar to the conditional requirements of MDP action plans) <p>Our proposal is supported by the following points – driven by the solution to be implemented and determinations from 6+ years of managing malfunctions and enquiries about malfunctions:</p> <ul style="list-style-type: none"> • Driving efficiencies in the market: <ul style="list-style-type: none"> ○ Removing the requirement to notify of the approved exemption or extension, as affected Participants will get CR notifications of the Exemption ID and the Exemption Expiry Date

Section	Description	Participant Comments
		<ul style="list-style-type: none"> ○ Ensuring provision of information is provided such as MP rectification plan, when needed or utilised – reducing the volume of administrative ‘noise’ and participant cost. ● The current AEMO Procedure obligations were written in 2017 with a specific process in mind. Since then a decision was made to include the information in MSATS for Participant visibility and market efficiency. AEMO determined to implement an automated process to enable the population of the fields. PLUS ES supports that this scenario is no different from any other piece of information communicated in MSATS. i.e. TNI, GNAF PID, etc. <p>Hence, while the obligation is on the MC to apply for exemptions from AEMO, due to the automated solution, availability and population of the exemption ID/expiry date in MSATS and AEMO issuing and populating the fields, the obligation as written cannot remain with the MC to advise affected Participants. The proposed amendments to this procedure also state in section 2.3(a):</p> <p style="text-align: center;"><i>Other participants who have a relationship with the NMI within the exemption will receive notification via the CR Notification process as MSATS is populated or re with Unique ID and exemption expiry date upon approval or when these values in the fields are removed upon expiry of exemption, rectification of metering installation or cancellation of exemption.</i></p> <ul style="list-style-type: none"> ● The obligation to provide the MP plan to affected Participants (not including AEMO) is an AEMO obligation and is not a direct outcome of a NER clause. NER clause 7.8.10(c) states:

Section	Description	Participant Comments
		<p>(c) If an exemption is provided by AEMO under this clause 7.8.10 then the Metering Provider must provide AEMO with a plan for the rectification of the metering installation.</p> <p>AEMO can collaborate with industry to drive market efficiencies by making appropriate amendments to their Procedure. Additionally, the consultation rule changes recently applied, give AEMO the flexibility to extend the consultation by another round, as required.</p>
General	Missing CATS AEMO Obligation	<p>Furthermore, PLUS ES also recommend that an obligation should be included in section 2.10 AEMO CATS procedure to support the requirement for AEMO to populate MSATS, similar to TNI, GNAF PID, etc obligations. For example,</p> <p>AEMO must:</p> <p>Populate MSATS with the Exemption ID and the Exemption Expiry Date following the approval of an exemption or exemption extension application.</p>
	Clause (d)	<p>With similar supporting points to those provided against clause (b), PLUS ES recommends amending clause (d) as follows:</p> <p>(d) Keep AEMO informed of any changes to the MP’s rectification plan including providing a copy of the amended rectification plan. Provide all affected Participants, a copy of the amended MP Rectification plan for LVCT and HV metering.</p>
	Updated 2.8(f) to include timeframes for notifying new MC of existing	

Section	Description	Participant Comments
	exemptions and clarified the point to align with the automation process.	
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	
2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	
2.11 Revocation of Exemption		<p>PLUS ES recommends modifying the clause to reflect the metering installation exemption automation process and its benefits by deleting the last part of the section</p> <p>...whereupon the Current MC must notify all affected Participants of the revocation within one business day.</p> <p>Whilst we acknowledge AEMO comments and the intent is to have all affected Participants made aware of the revocation, we do not agree with the obligation as written nor should it sit with the MC. Please refer to PLUS ES supporting points against section 2.8 (b).</p> <p>Additionally, the MC is dependent on the interpretations of Participants. This clause could be interpreted literally placing an additional obligation and cost on the MC to inform Participants as the CR notifications are not directly triggered by the MC.</p>
3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	

Section	Description	Participant Comments
3.2 Contents	Added a new section on the MDP action plan	
Appendix A. Application for Exemption	Deleted Appendix A	
Appendix B. Application for Extension	Deleted Appendix B	

3. Metering Exemption (Small Customer Metering Installation)

Section	Description	Participant Comments
1.3 Related documents		PLUS ES notes that the Exemption Procedure Metering Installation Malfunction has been added to the related documents. We do not think there is a relationship between small customer exemptions and metering malfunction exemptions. Propose to update if erroneously added.
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	

Section	Description	Participant Comments
2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	Editorial – replace numerical 30 with the word thirty for consistent formatting.
2.2.2 Expiry		<p>PLUS ES recommends that clause (b) is amended to ensure consistent remote acquisition is established. (Where consistent needs to be defined).</p> <p>PLUS ES acknowledges AEMO's comments and respectfully disagree. There is an opportunity to drive efficiency in the consultation space with the procedure being open for consultation irrespective of the trigger. Both AEMO and Participants are equally under resourcing constraints and raising and progressing an ICF to consultation and beyond is not a small undertaking.</p> <p>The proposal is a clarification in the process – a item not misaligned with the topic which triggered the procedure to be consulted on.</p> <p>Additionally, PLUS ES understands that the recently implemented consultation rule changes, give AEMO the flexibility to extend the consultation by another round, as required.</p>
3.2 Form of Application	Updated section to reflect the new automated exemption process	
3.4 Timing of Application		PLUS ES acknowledges AEMO's comments and respectfully disagree. There is an opportunity to drive efficiency in the consultation space with the procedure being open for consultation irrespective of the trigger. Both AEMO and Participants are equally under resourcing constraints and raising and progressing an ICF to consultation and beyond is not a small undertaking.

Section	Description	Participant Comments
		<p>Additionally, PLUS ES understands that the recently implemented consultation rule changes give AEMO the flexibility to extend the consultation by another round, as required.</p> <p>PLUS ES recommends a review of the clause and appropriate modifications made to capture most use cases in which the MC may be required and can apply for an exemption.</p> <ul style="list-style-type: none"> No later than 30 bus days post metering installation – whilst in most cases this may be efficient, there are use cases where 30 bus days is not sufficient timeframe for the MP to exhaust all remedies to establish remote communications. Examples of use cases where remote acquisition capability remediation may exceed 30 bus days: access issues, permissions from strata groups, sourcing of equipment etc. <p>For MC/AEMO efficiencies and processes reflective of real timeframes, PLUS ES recommends the timeframe is extended to 60 business days. Especially as MC and MDP obligations/practices have evolved since these procedures were implemented.</p> <ul style="list-style-type: none"> The current scope and wording do not support an exemption application where an established remote communicating metering installation ceases to communicate due to environmental or physical conditions post 30 business days after installation, such as the telecommunications service provider relocating their infrastructure and creating a ‘<i>dead zone</i>’. This scenario has been allowed for but only when the MC changes not for the current MC. See also PLUS ES comments against section 4.3 below
3.5 AEMO’s Determination	Updated section to reflect the new automated exemption process	Editorial – replace the numerical 10 with the word ten for consistency.

Section	Description	Participant Comments
3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	<p>PLUS ES acknowledges AEMO's comments and respectfully disagree. There is an opportunity to drive efficiency in the consultation space with the procedure being open for consultation irrespective of the trigger. Both AEMO and Participants are equally under resourcing constraints and raising and progressing an ICF to consultation and beyond is not a small undertaking.</p> <p>PLUS ES recommends the following:</p> <ul style="list-style-type: none"> • Clause (b) be modified so that the commencement exemption date is the 'Date first aware of the issue'. This information is requested in the application form and should be used. Any date, other than the metering installation date or the 'Date first aware of the issue' leaves the MC exposed to non-compliance, especially with conditional administrative requirements such as receipt of supporting documentation. <p>The MC will undertake a series of tests etc if a metering installation is not communicating to ensure it cannot be resolved before applying for an extension. This should not leave them open to non-compliance. This practice also ensures that potentially unnecessary exemption applications are not submitted.</p> <ul style="list-style-type: none"> • Editorial - For succinctness, the conjunction between clause (a) and (b) to be removed or amended from 'and' to 'or' as only one date can apply.
3.7 Current MC's Obligations during the Exemption Period	Clause (a)	<p>PLUS ES questions the intent and value this obligation delivers, as currently worded. Irrespective what the telecommunications network provider indicates, realistically the MC is certain that coverage has been provided once the metering commences communication. Then the only applicable clause would be (b) where an MC needs to apply for a further exemption if their metering installation will remain without communications.</p>

Section	Description	Participant Comments
		<p>What is also unclear is why AEMO requires this information requested in clause (a).</p> <p>PLUS ES acknowledges AEMO's comments and respectfully disagree. There is an opportunity to drive efficiency in the consultation space with the procedure being open for consultation irrespective of the trigger. Both AEMO and Participants are equally under resourcing constraints and raising and progressing an ICF to consultation and beyond is not a small undertaking.</p>
<p>3.7 Current MC's Obligations during the Exemption Period</p>	<p>Updated point 3.7(b) to advise that exemptions can't be extended.</p>	<p>PLUS ES supports there would be greater efficiency if the timelines of exemption applications and extensions were aligned.</p> <p>Whilst AEMO have a consistent timeframe of 10 business days to approve, the metering malfunction extensions have at least 7 days to submit, and the small customer exemptions have 30 business days.</p> <p>PLUS ES proposes AEMO considers the possibility of aligning the timeframes for extension applications irrespective if it is a metering malfunction extension or a new application as is with small customer exemptions, to drive downstream efficiencies for participants managing their exemptions.</p>
<p>4.2 Application for Exemption if No Change in Circumstances</p>	<p>Updated section to reflect the new automated exemption process – Clause (a)</p>	<p>PLUS ES seeks clarification of the purpose of clause (a), especially as the current MC is notified that a new MC has been nominated via MSATS notifications. AEMO also has access to these notifications.</p> <p>For efficiency and streamlined processes PLUS ES proposes that the clause is deleted.</p>
	<p>Clause (b)</p>	<p>Section 4.1 of this Guideline states that an existing exemption is not transferrable to a new MC. It is then reasonable to determine that the new MC will need to apply for a new exemption.</p>

Section	Description	Participant Comments
		<p>Hence, PLUS ES seeks clarification on the benefits of the additional requirements such as statutory declarations and a restriction of 5 business days. The new MC should be referred to the relevant section of the Application Process where they need to provide the supporting documentation to justify the exemption.</p> <p>The Guideline does not include the scenario where a new MC requires an exemption and they do not raise the exemption within 5 business days of becoming MC.</p>
4.3 Change in Circumstances	Deleted reference to Appendix A	<p>This section enables the new MC to submit an exemption application when a change in circumstances affect the availability of a telecommunications network. What is the definition of a new MC for this clause. PLUS ES proposes that a timeframe is defined for which the latest appointed MC is considered 'new'.</p> <p>PLUS ES has raised previously a gap in the Guideline. Whilst the new MC can submit an exemption application if circumstances affect the availability of a telecommunication network, it does not afford the current MC the same allowance. Please also refer to our second dot point against section 3.4.</p> <p>PLUS ES proposes that this process is also available to the current MC as they are valid existing scenarios.</p>
Appendix A. Application for Exemption	Deleted Appendix A	

4. Metering Installation Exemption Guideline (New Document)

Section	Participant Comments
3. Application process	
3.1 Generally	
3.2 Responsibility	
3.3 Supporting Information to support Application	
4. Creation and Management of an Application	
4.1 Exemption life cycle	
4.2 Navigation to exemptions	
4.3 Exemption list	PLUS ES seeks clarification how one can filter and identify exemption codes and by types via the Portal. I.e a metering malfunction exemption vs small customer, a malfunction exemption – family failure etc.
4.4 Creating a new exemption	PLUS ES notes that an Exemption ID is provided when the submitted application is accepted and validated. The Procedure notes that AEMO has 2 business days to provide the ID. There should be an alignment between the outcome and the obligations.

Section	Participant Comments
Technical /Design details.	There is pertinent technical/design information which will impact MCs in the design of their supporting exemption processes. Information which remains unknown. For example, what is the maximum allowable characters for the Action Taken and Action Reason field? If efficiencies are to be driven by the MC, they need to know how to populate these fields and what limitations exist. The Procedure has a requirement of information to be provided and the Automated Process tool needs to enable the capability.
4.5 Reviewing an exemption	PLUS ES seeks clarity on the use of APIs and notifications of updated statuses of exemptions. Do Participants have to rely on the SDQ reports for such status updates which cannot be derived by the updating of MSATS fields. For example, will statuses such as, For review, More Info etc be pushed to the participants?
4.6 Providing more information	PLUS ES raises the concern of NMIs being rejected during validations and the reason why they have been rejected is not stated will cause downstream inefficiencies. Since AEMO's solution rejects on a failed validation it recognises the validation failed. The solution should provide the MC with the reason, otherwise how is the MC to know what caused the NMI to reject? As noted in this Guideline there are several reasons why a NMI may be rejected during validation.
4.7.3 Churn of MC	<p>The last Paragraph of the section - <i>If the new MC...expiry of exemption.</i></p> <p>This requirement is only applicable for the small customer exemption guideline. PLUS ES in addition to questioning the requirement of a stat dec also recommend the paragraph is removed to make the section applicable for all exemptions.</p> <p>Additionally we recommend providing the clarification that AEMO's solution will be updating the NMI status in an exemption to MC Churn, when it occurs in MSATS, without further notification requirements from the 'Old' or the 'New' MC.</p>
4.8 Viewing closed exemptions	
4.9 Exemption notifications	Clarification is sought with respect to ME_T4A_REVIEW SDQs. The Guideline states it will notify the MC when an application has been approved or rejected. How will the MC be informed when these exemptions are closed/expired as the exemption ID and expiry date is not in MSATS? Will they be included in the ME_EXPIRED SDQ?

Section	Participant Comments
	PLUS ES also has concerns and clarification sought if they have to wait for a weekly report to identify status updates or rely on monitoring the portal for status updates, especially with respect to the potential volumes. The earlier option may cause a non-compliance for the MC and the latter increases the MC's resourcing effort to manage.
4.10 Transition of existing exemptions	
4.11 CSV formats	
4.12 API Navigation	<p>PLUS ES is seeking API definitions, tech specs and a sandpit/pre prod to test and complete our build. Due to the participant impacts no less than 3 months from go-live. Due to resourcing challenges there is little confidence the build and test can be completed with a shorter timeframe. Some examples:</p> <ul style="list-style-type: none"> • Submit Request API appears to be 2 parts. Why is this not one payload? <ul style="list-style-type: none"> ○ Will an API definition document be Shared? • Please confirm how the ExemptionID is returned. <ul style="list-style-type: none"> ○ In the 200 record of the Submit OR ○ PLUS ES to call Use Get Meter <p>Furthermore, the provisioning of a Sandpit must be made no later than 8weeks of go live date. Currently, Pre pod has been scheduled for early Oct – providing MCs appr 4 weeks. This is insufficient timing to User test, resolve and complete operational work instructions.</p>
5.1.2 Exemption codes – Shared Fuse	<p>SHARED FUSE: PLUS ES suggests this is a nature of an exemption and not a type of exemption, similar to access issues and should be moved to table 5.1.3.</p> <p>PLUS ES respectfully does not agree with AEMO's comment and believes this approach adds another level of complexity including downstream reporting, since Shared Fuse may or may not be related to a malfunctioning meter. Shared Fuse is a cause not a type of</p>

Section	Participant Comments																												
	<p>exemption. For example, the NER and current industry practice do not require us to raise an exemption for a metering installation (non-malfunctioning) which has been delayed due to a shared fuse. We manage it by exception reporting. The Rules do however require us to get an exemption for malfunctioning meters -individual/family failures - which cannot be rectified within the timeframes. i.e. the only reason we would be raising an exemption on a shared fuse is if it was identified as a malfunction, first. If a metering installation is malfunctioning, how does one determine if it is Family or Individual (where the site has a shared fuse) if you need to populate Shared Fuse?</p> <p>Hence PLUS ES' proposal to remove Shared fuse from Table 5.1.2. (see below proposed Table example)</p> <p>With respect to AEMO's comment regarding NER clause 7.16.3(c) (7) – this has been met in the industry by the introduction and population of the Shared Isolation Point Flag (SIPF) field in MSATS.</p> <table border="1" data-bbox="622 651 1917 1190"> <thead> <tr> <th>CODE TYPE</th> <th>CODE(in the tables)</th> <th>PARENT CATEGORY</th> <th>DESCRIPTION</th> </tr> </thead> <tbody> <tr> <td>EXEMPTION_TYPE</td> <td>DEFECTIVE</td> <td>MALFUNCTION</td> <td>DEFECTIVE / FAULTY METERING EQUIPMENT</td> </tr> <tr> <td>EXEMPTION_TYPE</td> <td>FAMILY</td> <td>MALFUNCTION</td> <td>METER FAMILY FAILURE</td> </tr> <tr> <td>EXEMPTION_TYPE</td> <td>SHARED</td> <td>MALFUNCTION</td> <td>SHARED FUSE (SHARED SUPPLY)</td> </tr> <tr> <td>EXEMPTION_TYPE</td> <td>NOPUBNWK</td> <td>TYPE4A</td> <td>NO PUBLIC TELECOMS NETWORK</td> </tr> <tr> <td>EXEMPTION_TYPE</td> <td>NOALTNWK</td> <td>TYPE4A</td> <td>NO ALTERNATIVE TELECOMS NETWORK</td> </tr> <tr> <td>EXEMPTION_TYPE</td> <td>ENVIRON</td> <td>TYPE4A</td> <td>PHYSICAL OR ENVIRONMENTAL CONDITIONS PREVENTING REMOTE COMMS</td> </tr> </tbody> </table>	CODE TYPE	CODE(in the tables)	PARENT CATEGORY	DESCRIPTION	EXEMPTION_TYPE	DEFECTIVE	MALFUNCTION	DEFECTIVE / FAULTY METERING EQUIPMENT	EXEMPTION_TYPE	FAMILY	MALFUNCTION	METER FAMILY FAILURE	EXEMPTION_TYPE	SHARED	MALFUNCTION	SHARED FUSE (SHARED SUPPLY)	EXEMPTION_TYPE	NOPUBNWK	TYPE4A	NO PUBLIC TELECOMS NETWORK	EXEMPTION_TYPE	NOALTNWK	TYPE4A	NO ALTERNATIVE TELECOMS NETWORK	EXEMPTION_TYPE	ENVIRON	TYPE4A	PHYSICAL OR ENVIRONMENTAL CONDITIONS PREVENTING REMOTE COMMS
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<p>5.1.3 – Proposed new code – MC Admin</p>	<p>PLUS ES proposes adding an additional Exemption Nature code of MC Admin, or similar to, to indicate that the installation has not been visited but an exemption has been requested to meet the rules timeframe obligation. As supported by NER Clauses 7.8.10 (a) & (b). That is, the MC is not aware of the nature of the exemption. It is not always possible to visit the site within the timeframes regulated. For example,</p> <ul style="list-style-type: none"> ○ 1000's of meters are deemed to be malfunctioning within the same period such as Family Failures. ○ The same challenges could apply to individual meters, in time of resourcing constraints such as multiple events placing demands on resourcing commitments. <p>PLUS ES has proposed the below amendments to the Table</p> <table border="1" data-bbox="622 627 1906 1259"> <thead> <tr> <th>CODE TYPE</th> <th>CODE(in the tables)</th> <th>PARENT TYPE</th> <th>DESCRIPTION</th> </tr> </thead> <tbody> <tr> <td>EXEMPTION_NATURE</td> <td>ACCESS</td> <td>DEFECTIVE</td> <td>ACCESS ISSUE</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>SAFETY</td> <td>DEFECTIVE</td> <td>SAFETY ISSUE</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>TECHNICAL</td> <td>DEFECTIVE</td> <td>SITE TECHNICAL ISSUE</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>CUSTOMER</td> <td>DEFECTIVE</td> <td>CUSTOMER WORK/UPGRADE REQUIRED</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>SHARED</td> <td>DEFECTIVE</td> <td>SHARED FUSE (SHARED SUPPLY)</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>MC ADMIN</td> <td>DEFECTIVE</td> <td>MC ADMIN ISSUE</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>ACCESS</td> <td>FAMILY</td> <td>ACCESS ISSUE</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>SAFETY</td> <td>FAMILY</td> <td>SAFETY ISSUE</td> </tr> </tbody> </table>	CODE TYPE	CODE(in the tables)	PARENT TYPE	DESCRIPTION	EXEMPTION_NATURE	ACCESS	DEFECTIVE	ACCESS ISSUE	EXEMPTION_NATURE	SAFETY	DEFECTIVE	SAFETY ISSUE	EXEMPTION_NATURE	TECHNICAL	DEFECTIVE	SITE TECHNICAL ISSUE	EXEMPTION_NATURE	CUSTOMER	DEFECTIVE	CUSTOMER WORK/UPGRADE REQUIRED	EXEMPTION_NATURE	SHARED	DEFECTIVE	SHARED FUSE (SHARED SUPPLY)	EXEMPTION_NATURE	MC ADMIN	DEFECTIVE	MC ADMIN ISSUE	EXEMPTION_NATURE	ACCESS	FAMILY	ACCESS ISSUE	EXEMPTION_NATURE	SAFETY	FAMILY	SAFETY ISSUE
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EXEMPTION_NATURE	MC ADMIN	DEFECTIVE	MC ADMIN ISSUE																																		
EXEMPTION_NATURE	ACCESS	FAMILY	ACCESS ISSUE																																		
EXEMPTION_NATURE	SAFETY	FAMILY	SAFETY ISSUE																																		

Section	Participant Comments			
	EXEMPTION_NATURE	TECHNICAL	FAMILY	SITE TECHNICAL ISSUE
	EXEMPTION_NATURE	CUSTOMER	FAMILY	CUSTOMER WORK/UPGRADE REQUIRED
	EXEMPTION_NATURE	SHARED	FAMILY	SHARED FUSE (SHARED SUPPLY)
	EXEMPTION_NATURE	MC ADMIN	FAMILY	MC ADMIN ISSUE
	EXEMPTION_NATURE	ACCESS	SHARED	ACCESS ISSUE
	EXEMPTION_NATURE	SAFETY	SHARED	SAFETY ISSUE
	EXEMPTION_NATURE	TECHNICAL	SHARED	SITE TECHNICAL ISSUE
	EXEMPTION_NATURE	CUSTOMER	SHARED	CUSTOMER WORK/UPGRADE REQUIRED
	EXEMPTION_NATURE	ACCESS	NOPUBNWK	ACCESS ISSUE
	EXEMPTION_NATURE	TECHNICAL	NOPUBNWK	SITE TECHNICAL ISSUE
	EXEMPTION_NATURE	ADMIN	NOPUBNWK	MC ADMIN ISSUE
	EXEMPTION_NATURE	ACCESS	NOALTNWK	ACCESS ISSUE
	EXEMPTION_NATURE	TECHNICAL	NOALTNWK	SITE TECHNICAL ISSUE
	EXEMPTION_NATURE	CUSTOMER	NOALTNWK	CUSTOMER WORK/UPGRADE REQUIRED
	EXEMPTION_NATURE	ADMIN	NOALTNWK	MC ADMIN ISSUE

Section	Participant Comments				
		EXEMPTION_NATURE	ACCESS	ENVIRON	ACCESS ISSUE
		EXEMPTION_NATURE	SAFETY	ENVIRON	SAFETY ISSUE
		EXEMPTION_NATURE	TECHNICAL	ENVIRON	SITE TECHNICAL ISSUE
		EXEMPTION_NATURE	CUSTOMER	ENVIRON	CUSTOMER WORK/UPGRADE REQUIRED
		EXEMPTION_NATURE	ADMIN	ENVIRON	MC ADMIN ISSUE
06.Appendix B					

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	

6. General

Item	Participant Comments
<p>Effective Date – 1 Nov 23</p>	<p>PLUS ES notes the Metering Exemption Automated Solution AEMO is implementing, is a new tool. Unlike existing market mechanisms, such as CATS, the ‘User’ Participants are not familiar with the design and workings of this tool without having access to finalised documentations, the opportunity to user test it, validate their assumptions etc.</p> <p>Once they have familiarised themselves with the AEMO solution and confirm solution alignment, Participants will have to develop operational instructions.</p> <p>For this reason PLUS ES supports that the 1 Nov 23 effective date should be a No-Go determination, if the below conditions are met:</p> <ul style="list-style-type: none"> • The technical design/specs including APIs etc is not available to the MC prior to the 1 Aug 23 and • Sandpit and/or Pre-Prod is not available 8 weeks prior to the 1 Nov 23. • The Procedure and Guidelines not been finalised a minimum of 4 months prior to 1 Nov 23, to allow MC to re-engineer and deliver their E2E system/business processes. <p>Additionally, PLUS ES supports that the next available date should be late Feb/early Mar due to the below considerations:</p> <ul style="list-style-type: none"> • Dec and Jan are resource challenged months due to the Christmas Shut down period and personnel leave. • IT system freezes from early Dec until well into late Jan. <p>The operational cost impacts to PLUS ES to go live on the 1 Nov 23 without the tested and implemented solution of APIs, finalised Procedures/Guidelines and the associated work instructions would be as follows:</p> <ul style="list-style-type: none"> • Moving from a current BAU to an interim more manual MSATS Browser process to then implement a solution which incorporates APIs • A manual BAU process with efficiencies driven by some system logic will revert to fully manual processes, for inputting, and monitoring, increasing:

Item	Participant Comments
	<ul style="list-style-type: none">○ The resource requirements effort significantly○ The likelihood of human error potentially leading to non-compliance.● Impacting PLUS ES delivery road map with respect to overall release planning and scheduling of resources