METERING INSTALLATION EXEMPTION AUTOMATION CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Alinta Energy

Submission Date: 12th May 2023

Classification: INTERNAL

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Classification: INTERNAL

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. Question on Metering Installation Exemption Automation Effective Date

Heading	Participant Comments
Do you agree with the 1 November 2023 effective date? If not, why not?	Agree

3. 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	Agreed
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	Agreed

Section	Description	Participant Comments
2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	Agreed
2.3 AEMO's Determination	Increased AEMO's determination timeframes due to high number of applications received. Added clarification that the new automated exemption process will be two steps process.	Agreed and understood
2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Date of commencement should be the date the exemption is applied for. Current process is to provide all necessary information up front at time of lodgement. New process requires delay in provision of additional information. AEMO has 5 days to provide Exemption ID before additional information can be emailed. This may cause periods of non-compliance while AEMO make determination.
2.6 Application Unsuccessful	deleted the following point: (a) A failure to complete the application form;	understood
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.	understood
2.8 Current MC's Obligations during	Updated 2.8(f) to include timeframes for notifying new MC of existing	understood

Section	Description	Participant Comments
the Exemption Period	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	understood
2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	understood
3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	understood
3.2 Contents	Added a new section on the MDP action plan	understood
Appendix A. Application for Exemption	Deleted Appendix A	understood
Appendix B. Application for Extension	Deleted Appendix B	understood

4. 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	N/A
2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	N/A
3.2 Form of Application	Updated section to reflect the new automated exemption process	N/A
3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	N/A
3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	N/A
3.7 Current MC's Obligations during the Exemption Period	Added new point 3.7(c) to advise that exemptions can't be extended.	N/A
4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	N/A

Section	Description	Participant Comments
4.3 Change in Circumstances	Deleted reference to Appendix A	N/A
Appendix A. Application for Exemption	Deleted Appendix A	N/A

5. Metering Installation Exemption Guideline (New Document)

Section	Participant Comments		
3. Application proces	3. Application process		
3.1 Generally	N/A		
3.2 Responsibility	N/A		
3.3 Supporting Information to support Application	N/A		
4. Creation and Management of an Application			
4.1 Exemption life cycle	N/A		

Section	Participant Comments
4.2 Navigation to exemptions	N/A
4.3 Exemption list	N/A
4.4 Creating a new exemption	N/A
4.5 Reviewing an exemption	N/A
4.6 Providing more information	N/A
4.7 Managing an exemption	N/A
4.8 Viewing closed exemptions	N/A
4.9 Exemption notifications	N/A
4.10 Transition of existing exemptions	It is not clear if participants associated with the NMI will suddenly receive bulk lot of transactions as a result of AEMO transitioning existing exemptions.
4.11 CSV formats	N/A

Section	Participant Comments
4.12 API Navigation	N/A

6. 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	N/A