

METERING INSTALLATION EXEMPTION AUTOMATION CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

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Submission Date: *12 May 2023*

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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. 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?	Yes

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	Agree.
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	Agree.

Section	Description	Participant Comments
2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	Agree.
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>	Agree.
2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Agree.
2.6 Application Unsuccessful	<p>deleted the following point:</p> <p>(a) A failure to complete the application form;</p>	Agree.
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>	We suggest AEMO add detail on how they will notify the MC and mention this will be by the SDQ reports as a clarification.
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.	Clause 2.8.b: We understand the new process will be that when AEMO approves an exemption or an extension to an exemption then AEMO will inform the market by updating MSATS and impacted participants will be notified via MSATS notifications.

Section	Description	Participant Comments
		<p>Therefore, we believe the obligation on MCs to notify participants is now redundant and we suggest that this be removed from this clause.</p> <p>Clause 2.8.b: We understand that the key information in a rectification plan is the date when a malfunction will be resolved. We believe that this key information will be communicated to impacted participants via the new field called Meter Malfunction Exemption Expiry Date. Therefore, we believe the obligation on MCs to provide impacted participants a copy of the MP’s rectification plan is redundant and we suggest that this be removed from this clause.</p> <p>Clause 2.8.b: If AEMO was to maintain this clause then we suggest that the timeframe be extended from 1 business day to 5 business days. We agree with AEMO that the volume of exemptions getting raised warrants all parties involved in the process be afforded additional time for manual steps, which would include the obligations defined in this clause.</p> <p>Clause 2.8.e: Notification of when a malfunction is rectified will now be achieved via the automation process and affected Participants will be notified from MSATS. We suggest this clause be reworded to:</p> <p style="padding-left: 40px;">Notify AEMO when the metering installation malfunction has been rectified by updating the status of the NMI to Resolve as per the Meter Exemption Guideline.</p> <p>Clause 2.8.f: We believe with automation this process could be made more effective by removing manual obligation on the old MC and instead let the new MC utilise the ME_MC_CHURN SDQ report. In addition, given the SDQ report is to be scheduled weekly we believe that providing 10 business days for the new MC to apply for an exemption is more achievable. We also don’t believe that the old MC should have to provide the MP’s</p>

Section	Description	Participant Comments
		<p>rectification plan to the new MC because the new MC will nominate their own MPB rendering this rectification plan obsolete as it will have no relevance on how/when the site will be rectified especially in the bulk exemption scenario. Therefore, we suggest that this clause be reworded to:</p> <p style="padding-left: 40px;">Must use the ME_MC_CHURN SDQ report and if necessary apply for an exemption within 10 business days from when they became the MC.</p>
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	Agree.
2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	Agree.
2.11 Revocation of Exemption		<p>Clause 2.11: Notification of when an exemption is revoked will now be achieved via the automation process and affected Participants will be notified from MSATS. We suggest this clause be reworded to:</p> <p style="padding-left: 40px;">If the Current MC fails to meet any condition of the exemption specified by AEMO, or any of the conditions specified in section 2.8, AEMO may revoke the exemption, notify the Current MC of the revocation and update MSATS.</p>
3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	Clause 3.1.ii: We disagree with adding this additional obligation on MCs to provide a MDP action plan for HV and LV CT sites. We believe that this additional obligation is adding additional administrative responsibility for minimal benefit because MDPs are accredited

Section	Description	Participant Comments
		<p>participants who are obligated to comply with the metrology procedures for substitutions and are regularly audited. In addition, impacted participants have the right to request the MDP to change the substitution if they believe the substitution is not appropriate for a NMI. We also note that the NER does not require a MDP action plan for an exemption. We suggest that clause 3.1.ii be removed.</p>
3.2 Contents	Added a new section on the MDP action plan	<p>Clause 3.2.2: We disagree with adding this additional obligation on MCs to provide a MDP action plan for HV and LV CT sites. We believe that this additional obligation is adding additional administrative responsibility for minimal benefit because MDPs are accredited participants who are obligated to comply with the Metrology Procedures for substitutions and are regularly audited. In addition, impacted participants have the right to request the MDP to change the substitution if they believe the substitution is not appropriate for a NMI. We also note that the NER does not require a MDP action plan for an exemption. We suggest that clause 3.2.2 be removed.</p>
Appendix A. Application for Exemption	Deleted Appendix A	Agree.
Appendix B. Application for Extension	Deleted Appendix B	Agree.

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	Agree.
2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	Agree.
3.2 Form of Application	Updated section to reflect the new automated exemption process	Agree.
3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	Agree.
3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Agree.
3.7 Current MC's Obligations during the Exemption Period	Added new point 3.7(c) to advise that exemptions can't be extended.	Agree.
4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	Clause 4.2.a: We believe that AEMO will have better visibility of a change to the MC where an exemption was granted with the implementation of this new automation. Therefore, the obligation on the MC to notify AEMO of a new MC is now redundant and we suggest that this clause be removed.

Section	Description	Participant Comments
		<p>Clause 4.2.b: Could AEMO please confirm if an exemption approved under this procedure will result in an update to MSATS? If no, then the MC will not have visibility on whether there is an exemption granted as per this procedure. Therefore, we suggest AEMO considers updating MSATS for exemptions approved under this procedure or create a new SDQ report that informs an MC who recently became the MC for a NMI that has an exemption approved under this procedure.</p> <p>Clause 4.2.b: We suggest that the timeframe be extended from 5 business days to 10 business days. We agree with AEMO that the volume of exemptions getting raised warrants all parties involved in the process be afforded additional time for manual steps, which would include the obligations defined in this clause.</p>
4.3 Change in Circumstances	Deleted reference to Appendix A	Agree.
Appendix A. Application for Exemption	Deleted Appendix A	Agree.

5. Metering Installation Exemption Guideline (New Document)

Section	Participant Comments
3. Application process	Clause 3: We believe the reference to clause 7.8.3(a) of the NER is not appropriate and suggest that this be replaced with 7.8.10(a).
3.1 Generally	None.
3.2 Responsibility	None.
3.3 Supporting Information to support Application	None.
4. Creation and Management of an Application	
4.1 Exemption life cycle	None.
4.2 Navigation to exemptions	None.
4.3 Exemption list	We suggest that Exemption Category, Exemption Type and Nature of Exemption be part of the search criteria
4.4 Creating a new exemption	<p>Clause 4.4.1: It states that validations will reject the NMI if "... NMI is included in another active exemption id". However, clause 3 states that exemptions are granted to the Current MC, which means any NMI with exemption granted to a MC who is no longer the Current MC is no longer valid. To avoid any doubt, we suggest that the validation statement be updated to:</p> <p style="padding-left: 40px;">NMI is included in another active exemption id that is granted to the Current MC.</p>

Section	Participant Comments
4.5 Reviewing an exemption	None.
4.6 Providing more information	<p>Clause 4.6.1: It states that validations will reject the NMI if "... NMI is included in another active exemption id". However, clause 3 states that exemptions are granted to the Current MC, which means any NMI with exemption granted to a MC who is no longer the Current MC is no longer valid. To avoid any doubt, we suggest that the validation statement be updated to:</p> <p style="padding-left: 40px;">NMI is included in another active exemption id that is granted to the Current MC.</p> <p>Clause 4.6.1.1.b: Grammar error in the statement "selecting the check box next to a NMI(s), updating the Planned fix data and/or Substitute required checkbox, then selection the Change NMI details action". Change 'selection' to 'selecting'</p>
4.7 Managing an exemption	None.
4.8 Viewing closed exemptions	None.
4.9 Exemption notifications	<p>ME_EXPIRE_SOON: could this be set to 21 calendar days to allow more time to manage this report?</p> <p>ME_EXPIRE_SOON: could you please clarify what are sdr_key_2 and sdr_key_3?</p> <p>ME_EXPIRED: Please clarify what sdr_key_2 and sdr_key_3 are.</p> <p>ME_MC_CHURN: Please clarify what sdr_key_3 and Field are.</p> <p>ME_T4_REVIEW: Can this be renamed to ME_T4A_REVIEW? Also, could you please clarify what sdr_key_3 and Field are?</p> <p>We wish to suggest new reports:</p>

Section	Participant Comments
	<ul style="list-style-type: none"> • Malfunctions (if AEMO does not automatically update the NMI to 'resolved' when NMI status changes to X): ME_EXTINCT where a NMI changes to X status that is part of an active exemption. Would allow MCs to set the NMI to 'resolved'. • MRAMS (if AEMO does not populate MSATS for a Type4A exemption approvals): ME_T4A_MC_CHURN where a Type 4A has an approved exemption and there is a change in MC. Would allow new MCs to better identify and apply for an exemption. • Malfunction now metered (if AEMO does not automatically resolve a NMI when there is a change in meter type): ME_MALFUNCTION_METERED where a NMI has an approved exemption and meter type has now changed to COMMS1 to 4, COMMS4C, COMMS4D or MRAM. Would allow the MC to update the status to resolved.
4.10 Transition of existing exemptions	None.
4.11 CSV formats	None.
4.12 API Navigation	None.
5. Appendix A	<p>Clause 5.1: This is going to impose a lot of extra work on MC's as currently exemptions that are applied for in bulk are not split by exemption type codes/nature of exemptions categories.</p> <p>When new bulk exemptions are applied for we may not know at that point what is the appropriate exemption type codes/nature of exemptions categories other than the meter has malfunctioned. Splitting meter malfunctions by categories could result in up to 12</p>

Section	Participant Comments												
	<p>different exemptions if that info is provided by FRMPS (and there is no standard text either) and there will be a lot more data trawling to split out the data which means even though we are going to an automated platform it will result in many more exemptions under management than is currently the case which goes against the NEO.</p> <p>If AEMO want exemptions split out into categories, then they need to allow MCs to create rolling bulk exemptions where sites can be added and resolved. They would still have an expiry date but could be reconciled periodically so sites could be resolved, and new ones added if these sites cannot be rectified with in the MIT timeframes. There is no reference in the NER or the Malfunction Exemption Procedure which would prevent this only AEMO’s interpretation of the rules, and the new automated system functionality could allow for this especially if the proposed further automation processes are adopted.</p> <p>Clause 5.1.3: We suggest another exemption nature called ‘faulty metering equipment’ be added for the scenario where it is not practically possible to rectify these malfunctions within the allowable timeframes. We suggest the following be added:</p> <table border="1" data-bbox="430 841 1570 1003"> <thead> <tr> <th>CODE TYPE</th> <th>CODE</th> <th>PARENT TYPE</th> <th>DESCRIPTION</th> </tr> </thead> <tbody> <tr> <td>EXEMPTION_NATURE</td> <td>METER</td> <td>DEFECTIVE</td> <td>FAULTY METERING EQUIPMENT</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>METER</td> <td>FAMILY</td> <td>FAULTY METERING EQUIPMENT</td> </tr> </tbody> </table>	CODE TYPE	CODE	PARENT TYPE	DESCRIPTION	EXEMPTION_NATURE	METER	DEFECTIVE	FAULTY METERING EQUIPMENT	EXEMPTION_NATURE	METER	FAMILY	FAULTY METERING EQUIPMENT
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6. Appendix B	Can we include the NMI number in the Email Subject line for single NMI exemption requests as well?												

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	Agree.