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Australian Energy Market Operator
Att. Power of Choice Committee
Level 22, 530 Collins Street
MELBOURNE VIC 3000

Sent via Email poc@aemo.com.au

15 November 2016

Dear AEMO,

Re: AEMO Power of Choice Procedure Changes (Package 2) - Consultation Paper

Active Utilities wishes to respond on behalf of our embedded network site owners and operators in reference to the Australian Energy Market Operator's (AEMO) recent consultation paper: *Power of Choice Procedure Changes (Package 2) dated October 10 2016*. We would like to commend AEMO on the views taken here, we feel that this paper is something that can now be used to formalise an improved regulatory frame work within the embedded network (EN) industry.

For background, Active Utilities is an embedded network service provider operating mainly with customers located on the east coast of Australia. Our utilities business comprises of consulting to Developers, Strata Managers and owners/ managers of buildings for the setup and ongoing management of EN. As part of this service we sometimes provide a billing management agency service to these entities to ensure that their end customers receive a similar service offering to normal network conditions and meet relevant legislative requirements of operating these networks. It is our intention to apply for the EN Manager accreditation to further assist our customers in the operation of their networks.

Attached we have provided further comment on several of the items raised in your various documents that we believe will continue to strengthen AEMO's approach to EN's. For ease, we have only responded to those points we feel necessary for our comment.

Thank you for the opportunity to respond as part of the ongoing consultation process regarding EN's. Should you wish to discuss any of the above in more detail please feel free to contact the undersigned.

Yours sincerely,

Mick Dovile
General Manager
Active Utilities Pty Ltd

METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: Active Utilities Pty Ltd*

***Completion Date**: 14-11-16*

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1. Glossary and Framework

Please delete any rows where there are no particpant comments

(note: only sections that have changed as part of Work package 2 are listed in the table below)

Clause	Heading	Participant Comments

2. Default & Deregistration Procedure (MP, MDP, ENM, MC)

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments

4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
10	NMI RULES	Section 10, Rule 2, paragraph 4 – this clause refers to if an existing connection point becomes a child connection point the NMI will not be changed. We disagree with this change – we feel that the NMI should be abolished at this point.

5. Qualification Procedure

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
3	QUALIFICATION PROCESS	We are concerned that the ENM qualification requiremnets are modelled from existing processes which we feel are too onerous for this catergory. We feel a tailored approach should be taken which separates the ENM role from other stakeholders.
3.6	Pre-Production Assessment	We have concerns with the requirements of an ENM to maintain similar IT systems to other stakeholders. We believe that this will force significant extra costs in to the EN which ultimately will be passed on to the end consumer.

6. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments
2.1	Embedded Network Management Services	• Sub clause (k) - this clause refers to the requirement to maintain EN wiring & metering information. We would like clarification as to what the exact requirements are here- this seems to be a movement away from principal requirements of an ENM? We are concerned that especially for Brownfield conversions or buildings that were converted to EN's some time ago that this information will either not be available or not be accurate. An ENO or ENM may not have the ability to have this audited due to many factors. • Sub clause (n) – this clause refers to maintaining a register of all allocated Child NMI's. We would like AEMO to provide a standard format for this collection of this information. We are concerned that should we take over management of an existing ENM that the information should be presented in a standard format to assist in transition. This will also assist AEMO in their auditing processes. • General – we would like to understand how AEMO would like the above information stored and what access will be required i.e. should this information be readily accessible via an online portal or via FTP?

3.1	Systems and Interface Requirements	We have concerns with the requirements to maintain similar IT systems to other stakeholders. We believe that this will force significant extra costs in to the EN which ultimately will be passed on to the end consumer.
3.2	Embedded Network Information	We would like to see a Data Format Guideline as to how this information is to be presented, with the view that it should be consistent between ENM's.

7. Unmetered Load Guideline

Please delete any rows where there are no particpant comments

Clause	Heading	Participant Comments

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments
General	N/a	N/a	We are generally concerned with the onerous nature of the ENM application, qualification and ongoing management processes detailed in these documents. While we agree that the ENM role is a valid approach to perceived issues surrounding EN's – we feel that as EN's only play a small part in the operation of the NEM that accreditation should refelect this. We are very concerned that for those smaller EN networks that these conditions will mean exit of the network or large fees being passed on to the end user. As an industry we cannot afford for existing EN's to fail as the

Document	Clause	Heading	Participant Comments
			cost and processes to convert to standard arrangments are not a viable solution.