METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

POC PROCEDURES CONSULTATION (PACKAGE 2)

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *Simply Energy*

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1. Glossary and Framework

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments

No comments.

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

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments SIMPLY ENERGY – Default & De-Registration Procedure
N/A	General	**Metering Coordinator Default Notice:** Nothing has been leveraged from RoLR process that could be highly beneficial for the industry when participants will be impacted as a result of the above MC default event. Whilst we understand RoLR and MC Default Event are two separate processes, in reality, there are a number of processes that can be used during a MC Default Event, (e.g. CATS transactions, AEMO's Bulk Change Tool, etc) that are used in RoLR Procedures. AEMO's obligation as a Market Operator is to ensure market is operating without any disruptions, especially from a consumers' perspective and hence by mere publishing default event notices to impacted parties is not a very useful solution. Would AEMO's systems be available during MC default event? If not, what is AEMO's view on the management of end to end process? Simply Energy would appreciate any views. AEMO's response: AEMO agrees that procedures may not cater for sudden mass change following the de-registration of an MC, MP or MDP. AEMO will consider whether this proposal can be considered as part of Package 3 <u>Simply Energy's response:</u> Simply Energy strongly recommends this to be considered or at least flagged in some sort of "opportunities register" for future changes associated with PoC.

Clause	Heading	Participant Comments SIMPLY ENERGY – Default & De-Registration Procedure
5	REVIEW OF CAPABILITY FOR ONGOING COMPLIANCE	Also, there must be some sort of discretion around different SLAs for non-material and material breaches in particular with rectification of mass market and large customers. Further, if the breach requires access to customer metering installations there may be a requirement for outage notifications to be issued to customers which require 4 business days' notice to the customer. AEMO's response: AEMO cannot respond to this submission without details of the proposal. <u>Simply Energy's response:</u> Simply Energy's point was to define SLAs at various levels instead of a fixed 5 business day SLA.

Clause	Heading	Participant Comments SIMPLY ENERGY – Default & De-Registration Procedure
5.1	Remediation Plan	AEMO to notify contracted parties as well (as per current MSATS roles), in addition to the ones listed in the Procedure. Include LR as well, there might be a case when tier 2 retailers managing an Embedded network are appointed as LR for child NMIs, and hence LR should also be included in the list of notified parties. Contracted and impacted parties (i.e. MC, retailer, network ENO etc) should be aware and agree any remediation plan as they may have to assist the affected parties (e.g. customer de-energisations to undertake physical work, customer notices for rebilling etc.) and be a party to the remediation reporting. AEMO's response: While AEMO sees merit in requiring the participant in Breach to: • consult with other affected participants when developing its remediation plan; and • keep affected participants informed of progress against an approved remediation plan, that would be as far as it should go. It is not appropriate for AEMO to fetter its discretion by seeking the agreement of affected participants to any proposed remediation plan. <u>Simply Energy's response:</u> We agree with the above provided these two dot points are appropriately called out in the Procedure.

Clause	Heading	Participant Comments SIMPLY ENERGY – Default & De-Registration Procedure
9.2	Process	AEMO must impose additional requirements/obligations on a deregistered MC and ENM, e.g., to provide relevant data to other parties similar to failed retailer obligations in RoLR. AEMO's response: AEMO will consider all impacts on the market before a de-registration is approved. However, AEMO has no power to impose requirements on de-registered service providers. <u>Simply Energy's response:</u> We understand that post de-registration, obligations will not be effective however there must be some data delivery obligations on failed Metering Service Provider similar to the obligations on failed retailer in the event of a RoLR prior to deregistration. At least in case of a RoLR, AEMO has all the relevant data however in case of an MC default event, the situation will be even worse for the market and highly disruptive for operation if a set data delivery criteria is not proceduralised.
APPENDIX A	NOTICE OF BREACH	The notices should also list who has received copies of the notice and should have a unique reference ID.

Clause	Heading	Participant Comments SIMPLY ENERGY – Default & De-Registration Procedure
		AEMO's response: Agreed. AEMO intends to redraft the notices and tabulate the information contained in them so that the variables appear more prominently. The Notice of Breach has been restructured in this way. If participants consider this to be a better form of notice, AEMO will restructure the others in a similar way following the conclusion of this consultation. <u>Simply Energy's response:</u> We support the restructured Notice of Breach and would be supportive of restricting other forms in a similar way.

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments SIMPLY ENERGY – Exemption Procedure
2.1	Applicant	It is quite possible for an MC to be churned during an exemption rectification process and it seems inefficient to require a new MC to commence making an application for a known issue which has already been submitted (and likely approved) for consideration. Whilst SIMPLY ENERGY agrees that an MC needs to apply, however if an exemption is granted, it should be associated with the metering installation and not with MC. AEMO's response: The NER states that the application for the exemption must be made by the MC for a connection point. AEMO interprets this to be the Current MC. If AEMO grants the exemption, logically and legally, the only participant to whom exemption may be granted is the Current MC. AEMO recognises that the MP must provide the rectification plan after the grant of the exemption, but that in no way suggests that the appropriate participant to whom the exemption should be granted is anyone other than the Current MC. If the rule had intended for the exemption to be as fluid as suggested, the rule would have stated as much. If any participant thinks that the exemption should granted to the MP/MDP, or any other participant for that matter, AEMO recommends that they submit a rule change proposal to the AER to that effect. That is not what the NER currently require or permit.

Clause	Heading	Participant Comments SIMPLY ENERGY – Exemption Procedure
2.1	Applicant	Simply Energy's response: The change of MC (without a change of MP or metering installation) should not void the exemption. AEMO has mentioned that it has no power to transfer the exemption to anyone else, it's not been constrained by rules in any way (unless it's AEMO's interpretation). The process will be a lot cleaner this way, and easier to manage, else a change in retailer might result in a change in MC and provided the meter remains the same, every time an MC has to reapply for exemption which is quite an inefficient process.
2.9	Expiry of Exemption	The NER states that the application for the exemption must be made by the MC for a connection point, it doesn't say that exemption cannot be made applicable for the connection point, hence AEMO's interpretation is not same as our interpretation. MC should apply exemption for the connection point, and hence the exemption should be granted for that connection point, not associated with any MC or anyone else. Simply Energy would like this to be clarified, and would strongly recommend that this exemption should not sit with any role per say.

4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments SIMPLY ENERGY – National Metering Identifier
N/A	General	Simply Energy supports AEMO's conclusion in section 4.1 of the Draft Report and Determination.

5. Qualification Procedure

Please delete any rows where there are no participant comments

No comments, thanks for providing clarification on previous comments.

6. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments SIMPLY ENERGY – Embedded Network Manager
3.5	Review of Accreditation	Editorial – there should be an "or" after every sub-item, i.e. after (a) and (b) as well.
4.1	NMI Allocation	While the ENM has five business days to provide the NMI when it is created, there is no SLA on how long it will take to allocate a NMI, which is not good customer experience as well as a poor business practice from a retailer perspective. It is not reasonable for the ENM to have no SLA for the allocation of a NMI. We'd recommend redrafting the following clause: (b) Upon request from a retailer for a new connection for a metering installation at a child connection point, apply to AEMO for a NMI for that child connection point, *within two business days.* SIMPLY ENERGY strongly recommends that the process from request to provision of NMI should be achievable within five business days.

7. Unmetered Load Guideline

Please delete any rows where there are no participant comments

No comments.

8. Other Issues Related to Consultation Subject Matter

Document	Clause	Heading	Participant Comments
Exemption Guidelines – Small Customer Metering Installation	2.2.2	Expiry	Simply Energy has some concerns with this clause. As per Clause 2.2.2(b) states that the exemption will cease 3 months after a telecommunications network provides coverage in the vicinity of a metering installation. However, it doesn't state if the exemption expired within the 5 year term or will be reassessed after 5 year terms. If it can expire within the 5-year term, AEMO is expecting MC to be policing the network availability on a regular basis? This is a highly unrealistic approach. MC/MP may not be aware of a change in telecommunications network or start date, and could therefore discover that an exemption has expired unexpectedly, making them non-compliant. The implication is that an MC must have a mechanism to monitor telecommunications company network roll outs, which is unreasonable. SIMPLY ENERGY believes that the clause should be redrafted to state that *Within 3 months of becoming aware of a telecommunications network providing coverage within the vicinity of a metering installation the MC must review the status of the metering installation and either enable communications (assuming no customer objection) or submit a new exemption application.* **Alternatively, Simply Energy would be comfortable recommending a shorter exemption time period (perhaps 3 years instead of 5 years), and delete the 3 months clause as stated above.**