

PROPOSED PROCEDURE CHANGE (PPC)

Issue Number	IN001/21		
Impacted Jurisdiction(s)	NSW/ACT ¹		
Proponent	Marc Flynn	Company	Jemena Gas Networks (JGN)
Proponent e-mail		Proponent phone #	
Affected Gas Market(s)	<ul style="list-style-type: none"> Retail 	Date proposal sent to AEMO	Wednesday, 16 September 2020
Short Issue Title	Amend the NSW/ACT Retail Market Procedure (RMP) so that certain Customer-own reads (COR) can be treated as an actual read if the read satisfies certain conditions. These amendments will align the RMPs with the temporary process that has been operating in Jemena Gas Networks (JGN) network sections since mid-2020 ² that were implemented to reduce the number of estimated reads as a result of limitations placed on JGN meter readers ability to read meters in a timely and safe fashion due to COVID-19 social distancing restrictions.		
Other key contact information	grcf@aemo.com.au		

VERSION #	PRESENTED TO	DATE
1.0	GRCF	6 August 2021

¹ Excludes the Wagga Wagga and Tamworth network sections.

² JGN implemented this process having received written advice from the Australian Energy Regulator (AER) on their decision not to take any action in relation to JGNs non-compliance.



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1. DESCRIPTION OF ISSUE

1.1. Background

In April 2020 Jemena Gas Networks (JGN) advised AEMO that, with the social distancing restrictions in place for COVID-19, JGN expected to see a large increase in the volume of estimated meter reads due to meter readers not being able to access apartment blocks and other medium-density/high-rise premises to read meters. To minimise the estimated read impact on customers, JGN proposed to temporarily send customer-own reads (COR) as actual meter reads. JGN also advised AEMO that they would seek the views of the Australian Energy Regulator (AER) on this proposal.

In August 2020 JGN advised AEMO that they had received advice from the AER that the AER proposed not to take any action in relation to JGN's non-compliance with certain sub-clauses within clause 3.5 of the NSW/ACT Retail Market Procedures (RMP) in respect to the temporary measure of treating eligible³ COR as actual meter reads. The no-action letter covered the period up to 31 December 2020⁴. These temporary measures to treat some COR as actual meter readings have therefore been implemented in JGN's systems.

1.2. Summary of the issue

As noted above, in order to mitigate the impact of estimated reads, JGN with a preapproved regulatory reprieve from the AER, implemented a temporary process whereby some COR would be treated as an actual read, resulting in fewer estimated reads.

This temporary process to allow COR to be treated as an actual read required that:

- (i) the customer supplies a photograph of the meter;
- (ii) the photograph sent to JGN is close to the scheduled read date; and
- (iii) the meter reading passes JGN's validation checks.

This temporary process has proven to be a very efficient and effective means to reduce the number of estimated reads. Therefore, JGN is proposing to continue with this process and has put forward a proposal to amend the RMP to include provisions that describe the criteria that JGN will apply when determining whether a COR can be treated as an actual read. See section 3 for further details on the RMP changes.

1.3. Submission instruction to this first stage consultation

Anyone wishing to make a submission for this first stage consultation stage is requested to use the response template provided in Attachment A. Submissions close Friday 20 August 2021 and should be e-mailed to grcf@aemo.com.au.

2. REFERENCE DOCUMENTATION

Retail Market Procedures (NSW and ACT) version 26.

³ JGN advice to the AER proposed to mitigate the impact of estimated reads on customers, by substituting customer-own reads as actual reads under three conditions: (i) the customer supplies a photograph of the meter; (ii) the photograph is uploaded close to the scheduled read date; and (iii) the read passes Jemena's validation checks.

⁴ This "no action" has been extended to 30 November 2021.



3. OVERVIEW OF CHANGES

3.1. Summary of changes

In summary the main amendments to the NSW/ACT RMPs are:

- (i) Add three new definitions to clause 1.2.1 (“Definitions”), namely “Customer-own read (Actual)”, “Customer-own read (Actual) criteria”, and “Customer-own read (Actual) methodology”;
- (ii) Modify five existing definitions in clause 1.2.1 (“Definitions”), in particular “estimated meter reading” and “validated meter reading”;
- (iii) Add a new sub-clause to clause 2.2(b)(viii) — namely, sub-clause 2.2(b)(viii)(E) — that requires the Network Operator to store the information used to validate a Customer-own read (Actual) meter reading and the information used to verify that meter reading meets the Customer-own read (Actual) criteria;
- (iv) Add a new sub-clause to clause 3.1.1 — namely, sub-clause 3.1.1(f) — that allows the Network Operator to not read a meter if the customer has entered into an arrangement with the Network Operator to provide CORs;
- (v) Add new sub-clause to clause 3.1.1 — namely, sub-clause 3.1.1(g) — that requires that AEMO publish a Customer-own read (Actual) methodology which specifies the criteria for a COR to be actual read and the requirements for a Network Operator to arrange to receive a Customer-own read;
- (vi) Add notes to clause 3.5 that explains what type of read would be provided in the Meter Data Notification (MDN) transaction; and
- (vii) Add two new sub-clauses to clause 3.5.1 — namely, sub-clauses 3.5.1(j) and 3.5.1(k) — that detail the requirements of what information the Network Operator must provide to the Financially Responsible Organisation (FRO) in the case of a Customer-own read (Actual).

This proposal also includes a new separate procedure called the “Customer-own read (Actual) methodology” which the arrangements to receive the customer read and validation requirements

See attachment B and C for further details.

3.1. Pre-consultation engagement

In September 2020 JGN requested that AEMO to add a new proposal to the Retail Market Issue / Change Register. This proposal involved amending the RMP wording around what an “actual meter read” is given the advancement of technology such as apps on mobile phones. At the Gas Retail Consultative Forum (GRCF) prioritisation session held in September 2020, participants supported adding this proposal to the GRCF 2021 work program.

In March 2021 JGN submitted a Gas Market Issue (GMI) paper to the GRCF regarding proposal IN001/21. Over the past four months, AEMO has been working with JGN and Retailers on preparing various draft amendments to the NSW/ACT RMPs.

AEMO submitted a revised draft of the RMP to the GRCF in mid-June 2021 which was discussed at the GRCF meeting on 17 June 2021. At that meeting Retailers put forward several drafting suggestions. Retailers also put forward their view on JGN’s position that no changes were needed to either the National Energy Retail Rules (NERR) or National Gas Rules (NGR). Retailers unanimously agreed with JGN’s position that no changes were needed to either the NERR or NGR.



AEMO issued a further revised draft of the RMP to the GRCF on 23 July 2021 which was discussed at a GRCF meeting on 28 July. Having reviewed the RMP and Customer-own read (Actual) methodology, the GRCF noted two potential material issues namely, issues with clause 3.5.2 relating to whether a flag should be provided to indicate that a read is a “Customer-own read (Actual)” and issues with section 5 of the Customer-Own Read (Actual) Methodology. Both were raised by AGL. The GRCF agreed that if these two issues could be reviewed and resolved, then AEMO should commence the formal consultation.

AEMO has completed its review of both issues.

Clause 3.5.2 (Meter Reading on Transfer Request) relates to the type of read indicator that the Network Operator sends to AEMO. In the draft change to the RMP that were circulated on 23 July 2021, it was proposed that a flag should be added to the meter reading to indicate that a read was a “Customer own-read” or that it was a “Customer own-read (Actual)”. At the 28 July meeting, the GRCF voiced concerns that a COR flag would be provided for a read that met requirements to be a “Customer-own read (Actual)”. AEMO has subsequently reviewed this issue and has determined the addition “or a Customer-own read (Actual)” is not required. The reason why AEMO believes a changes is not required is the reference to “if relevant” that is mentioned at the beginning of sub-clause 3.5.2(c)(iii). This means that the Network Operator would provide a “C” in the type or read indicator if it was a COR. Given that a “Customer-own read (Actual)” would be treated as an actual read, it would not be relevant to provide a flag indicating that it is a COR.

Section 5 of the Customer-Own Read (Actual) Methodology details the arrangements that a network operator must make with a customer in order to receive CORs. An issue tabled at the 28 July 2021 discussion was that a network operator can only enter into agreements to receive a COR in general, and whether that read is determined to be a “Customer-own read (Actual)” only occurs after the customer has submitted the COR in accordance with the “Customer-own read (Actual) criteria”. AGL therefore argued that, by stating “a Network Operator enters into an arrangement with a Customer to receive a Customer-own read (Actual) if...”, the drafting pre-supposes that the COR will be an actual, and as such, the drafting should remove “(Actual)” from all instances of “customer-own read” in Section 5.

AEMO has reviewed this issue and as determined this is not a material issue and there is no need to make any changes to the proposed Customer-Own Read (Actual) Methodology. AEMO’s reasoning for its position is that the arrangement encompasses the entire process from the initial point of sending the COR through to the end point of validating the COR to treat the meter reading as an actual read. For this reason, AEMO does not believe that including “actual” is an appropriate reference in the arrangement statement.

At the GRCF meeting on the 28 July 2021, AEMO noted that its view was that the benefits of this proposal will outweigh any costs. JGN and those retailers at the meeting did not raise any opposing positions, therefore AEMO advised that this position would be included in the PPC consultation.

4. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS

The likely implementation effect is negligible on the basis that the JGN has been operating the IT systems and process effectively and efficiently for some months without any material issues being raised. As testimony to this position, the AER has provided two extensions in relation to JGN’s non-compliance with certain clause within RMPs.



5. IMPACT OF ISSUE NOT PROCEEDING

If the changes identified in this PPC do not proceed, then JGN will need revoke the temporary IT system and business process that were implemented in 2020 that enable JGN to treat some COR received by JGN as actual reads under certain conditions. In addition, customers are unlikely to make sense of why JGN cannot bill using a picture of their meter - especially when JGN has previously been able to do it in response to COVID-19 pandemic.

6. OVERALL COST, BENEFITS AND MAGNITUDE OF THE CHANGES

In terms of costs, JGN has already implemented their system and business process to treat some customer own reads as actuals. As such, there are not expected to be any further system costs to JGN. The GMI that was sent to AEMO proposing RMP stated the changes were only documentation changes. No costings were provided, therefore AEMO has considered the Network Operator cost to be zero.

The changes do not impact the AEMO IT system. The only cost for AEMO is to facilitate the consultation, therefore AEMO’s costs are negligible.

During the pre-consultation process, Retailers have not raised any material cost concerns with AEMO. In terms of the overall costs, based on the information that it has obtained, AEMO’s view is the overall industry cost to implement this change is negligible.

In relation to benefits, as noted in the GMI, the proposed change will result in more accurate billing for any customer who chooses to submit a customer-own read. In turn this will reduce the costs incurred by Retailers and Network Operators in resolving estimated bill customer concerns. During the pre-consultation phase no Retailer opposed these benefits.

Noting the above, it is AEMO’s view that the benefits will outweigh the cost associated with this change. If any participant believes AEMO overall position is unreasonable, please include this in your submission to AEMO.

7. CONSISTENCY WITH NATION GAS RULES (NGR) AND NATIONAL GAS OBJECTIVE (NGO)

Consistency with National Gas Law (NGL) and NGR	Under the auspices of AEMO’s statutory functions relating to the NGL and NGR, it is AEMO’s view that the proposed change is consistent with the NGL and NGR because the proposed change promotes efficiency of the operation of the gas market via more accurate bills and improves price and quality outcomes for consumers by minimising the frustration from estimated bills. In reaching this decision AEMO also factored in the advice it has received from Retailers that they agree with JGN position that no changes were needed to either the NERR or NGR.
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National Gas Objective	As outlined in Section 6, it is AEMO's view that this change will reduce the costs incurred by Retailers and Network Operators in resolving estimated bill customer concerns and will improve overall customer satisfaction experience.
Any applicable access arrangements	AEMO's view is that the proposed change is not in conflict with existing Access Arrangements. No participant raised any objections during the pre-consultation regarding the proposal's consistency with any existing Access Arrangements.

8. SUPPORTING DOCUMENTATION

See Attachments B and C.

9. PROPOSED TIMELINES

Subject to all necessary approval's AEMO is targeting to implement this change in mid-November 2021.

In order to achieve this timeline, AEMO proposes the following key milestones:

- Issue PPC on Friday 6 August 2021
- Submission on PPC close Friday 20 August 2021
- Issue Impact and Implementation Report (IIR) on Friday 3 September 2021
- Submission on IIR close Monday 6 October 2021
- Issue AEMO decision Friday 24 October 2021



ATTACHMENT A – PPC RESPONSE TEMPLATE

A response template has been attached separately to this document. Anyone wishing to make a submission to this first stage consultation are to use this response template. Submissions close Friday 20 August 2021 and should be emailed to grcf@aemo.com.au.



ATTACHMENT B - DOCUMENTATION CHANGES - RMP

Draft versions of the RMPs (extract) showing tracked changes between the current version and the proposed changes are shown below. Blue underline means addition and ~~red-strikeout~~ means delete.

Clause 1.2.1 Definitions

actual meter reading The figures or other information shown on a *meter* or instrument as actually read.

For the purpose of these Procedures, a *Customer-own read (Actual)* is taken to be an *actual meter reading*.

Customer-own read A *read* of a *meter* undertaken by a *Customer*, details of which are provided by the *Customer* to the *User* or *Network Operator* for the *delivery point* to which the *meter* relates. For the purpose of these Procedures, except for a *Customer-own read (Actual)*, a *Customer-own read* is taken to be an *estimated meter reading*.

Customer-own read (Actual) A *Customer-own read* that satisfies *Customer-own read (Actual) criteria*. For the purpose of these Procedures, a *Customer-own read (Actual)* is taken to be an *actual meter reading*.

Customer-own read (Actual) criteria Those requirements for *Customer-own reads (Actual)* contained in the *Customer-own read (Actual) methodology*.

Customer-own read (Actual) methodology An industry approved methodology that specifies the requirements for a *Customer-own read (Actual)* which must be used for the purposes of these Procedures.

estimated meter reading An estimate of an *actual meter reading* (including an *actual meter reading that is a Customer-own read (Actual)*) that is made under these Procedures in accordance with an *approved estimation methodology*, or a *Customer-own read* (but in the case of a *read* which is a *Customer-own read (Actual)*, only in the case where that *read* fails validation).

special read A *read* undertaken by the *Network Operator* other than on a *scheduled read date*.

validated meter reading A *meter reading* that has been validated in accordance with an *approved validation methodology* or for a *Customer-own read (Actual)*, that has been validated in accordance with the *Customer-own read (Actual) methodology*.



Clause 2.2 Network Operator Metering Database

2.2 Network Operator Metering Database

- (a) Each *Network Operator* must create, maintain and administer a *metering database* that includes the following information in respect of each *delivery point* in its *network*:
- (i) the MIRN;
 - (ii) the *delivery point's discovery address* and any other site address information specified in the *Gas Interface Protocol*;
 - (iii) the *delivery point's customer characterisation*;
 - (iv) the *delivery point's meter reading frequency*;
 - (v) the *distribution tariff* to which that *delivery point* is assigned;
 - (vi) the supply point(s) associated with the *delivery point*;
 - (vii) for each *meter* at a *delivery point* or associated supply point:
 - (A) the *meter number* of the current installed meter;
 - (B) the *meter number* of the previous installed *meter(s)*, and the date and reason for each *meter change*;
 - (C) the next *scheduled read date* on which the *meter* is to be read;
 - (D) the *network section* in which it is located;

 - (E) the next known date (if any) on which a *special read* of the *meter* is to occur;
 - (F) the type of communication equipment (if any); and
 - (G) whether the *meter* is *de-energised* or *disconnected*.
 - (viii) for each *meter reading* undertaken during the previous 7 years:
 - (A) the date the *meter reading* was undertaken;
 - (B) the type of *meter reading* (validated actual by *Network Operator*, validated *Customer-own read*, validated Customer-own read (Actual) estimated, or substituted);



- (C) the *meter reading*; **and**
- (D) if the *meter reading* is an *estimated meter reading* or *substituted meter reading*:
 - (a) the date to which that *estimated meter reading* or *substituted meter reading* relates;
 - (b) the reason for the *estimated meter reading* or *substitution meter reading*; and
 - (c) the type of the *approved estimation methodology* or *approved substitution methodology* applied to obtain that *meter reading*; and
- ~~(E)~~ (E) if the *meter reading* is a *Customer-own read (Actual)*, the information used to verify that *meter reading* meets the *Customer-own read (Actual) criteria*.
- (ix) in respect of each *meter reading* for a *gas meter* included in the *metering database*:
 - (A) the *flow*;
 - (B) the *average heating value*;
 - (C) the *pressure correction factor* to be applied in respect of that *flow*; and
 - (D) the *consumed energy* in *MJ* during that *reading period*;



Clause 3.1.1 Next Scheduled Read Date

- (a) Each *Network Operator* must provide to the *Retailer* who is the *FRO* for a *delivery point* in its *network*, the next *scheduled read date* for a *meter* relating to that *delivery point*.
- (b) A *Retailer* may request the relevant *Network Operator* to change the date of the next *scheduled read date* for a *meter* relating to a *delivery point* for which the *Retailer* is the *FRO*. However, the *Network Operator* is not required to make the requested change.
- (c) A *Network Operator* must notify each *Retailer* who is the *FRO* for *delivery points* in its *network* of a change to the previously notified next *scheduled read dates* for a number of *delivery points* that represent a set, or multiple sets, of established *meter reading schedules*, as far as practicable prior to that change being made.
- (d) Subject to clause 3.1.1 (f) A *Network Operator* must use its reasonable endeavours to read a *meter* at a *delivery point* in accordance with the *scheduled read date* or as otherwise agreed with the *Retailer* who is the *FRO* for the *delivery point*.
- (e) If a *Network Operator* is unable to read the *meters* comprising a discrete route in accordance with a the *scheduled read date*, the *Network Operator* must use its reasonable endeavours to notify that failure to each *Retailer* who is a *FRO* for a *delivery point* to which such a *meter* relates by 5.00 pm on the 2nd *business day* after the day on which it was unable to read the *meter*.
- (f) A *Network Operator* is not required to read a *meter* at a *delivery point* in accordance with clause 3.1.1(d) if the *Network Operator* has received, or arranged to receive in accordance with the *Customer-own read (Actual) methodology*, a *Customer-own read (Actual)* for that *meter* in accordance with that *scheduled read date* or as otherwise agreed with the *Retailer* who is the *FRO* for that *delivery point*
- (e)(g) AEMO must ensure that at all times there is a *Customer-own read (Actual) methodology* which specifies the criteria to be met for a *Customer-own read* to be a *Customer-own read (Actual)* and the requirements for a *Network Operator* to arrange to receive a *Customer-own read (Actual)* from a *Customer* for the purpose of clause 3.1.1(f)



Clause 3.5.1 General Meter Readings

- (a) Subject to clause 3.1.7(c) and clause 4.1, a *Network Operator* must comply with the applicable requirements of this clause 3.5.1 for the provision of information to the *FRO* for a *delivery point* in the *Network Operator's* network in respect of each *meter* for the *delivery point* (identified by reference to its *MIRN*).
- (b) Where the *Network Operator* has read the *meter* in accordance with a *scheduled read date* and the *actual meter reading* is a *validated meter reading*, the *Network Operator* must use its reasonable endeavours to provide the *FRO* with the following information:
 - (i) the day on which the *meter* was read
 - (ii) the next *scheduled read date*; and
 - (iii) the *validated meter reading* for that meter,

by 5.00 pm on the next *business day* after the day on which a *gas meter* was read, or by 5.00 pm on the 4th *business day* after the day on which a *hot water meter* was read;

Note: For the purpose of the *Gas Interface Protocol, Participant Build Pack 5*, the *meter reading* under (b) will be assigned the value of "A" for the purpose of the field "Type of Read" in the *Meter Data Notification (MDN) transactions*.

- (c) Where the *Network Operator* has read the *meter* in accordance with a *scheduled read date* but the *actual meter reading* is not a *validated meter reading*, the *Network Operator* must:
 - (i) undertake an *estimated meter reading* as at that date in accordance with clause 3.3; and
 - (ii) use its reasonable endeavours to provide the *FRO* with the following information:
 - (A) the next *scheduled read date*;
 - (B) the *estimated meter reading* (identified as such) for that *meter*;
 - (C) the details of the *approved estimation methodology* applied to obtain that *estimated meter reading*; and
 - (D) the reason for the *actual meter reading* not being a *validated meter reading*,

by 5.00 pm on the 2nd *business day* after the day on which a *gas meter* was read or by 5.00 pm on the 5th *business day* after the day on which a *hot water meter* was read.

Note: For the purpose of the *Gas Interface Protocol, Participant Build Pack 5*, the *meter reading* under (c) will be assigned the value of "E" for the purpose of the field "Type of Read" in the *Meter Data Notification (MDN) transactions*.



- (d) Where the *Network Operator* has been unable to read the meter on a *scheduled read date*, the *Network Operator* must:
- (i) undertake an *estimated meter reading* as at the *scheduled read date* in accordance with clause 3.3; and
 - (ii) use its reasonable endeavours to provide the *FRO* with the following information:
 - (A) the next *scheduled read date*;
 - (B) the *estimated meter reading* (identified as such) for that *meter*;
 - (C) the details of the *approved estimation methodology* applied to obtain that *estimated meter reading*; and
 - (D) the reason for the *Network Operator* not being able to read the meter,

by 5.00 pm on the 2nd *business day* after the *scheduled read date* for a *gas meter* or by 5.00 pm on the 5th *business day* after the *scheduled read date* for a *hot water meter*.

Note: For the purpose of the *Gas Interface Protocol, Participant Build Pack 5*, the *meter reading* under (d) will be assigned the value of "E" for the purpose of the field "*Type of Read*" in the *Meter Data Notification (MDN) transactions*

- (e) Where the *Network Operator* has been unable to obtain a *validated meter reading* on a *scheduled read date*, the *Network Operator* must use its reasonable endeavours to provide the *FRO* with the following information:
- (i) the day on which the meter was *read*;
 - (ii) the next *scheduled read date*; and
 - (iii) the *validated meter reading* for that meter,

by 5.00 pm on the 2nd *business day* after the day on which a *gas meter* was read or by 5.00 pm on the 5th *business day* on which a *hot water meter* was read.



- (f) [Except where the Network Operator has been provided with a Customer-own read \(Actual\)](#) ~~W~~where the Network Operator has been provided a Customer-own read by the FRO or the Customer, and the Network Operator reasonably considers the Customer-own read to be accurate, the Network Operator must use its reasonable endeavours to provide the FRO with the following information:
- (i) the day on which the meter was [read](#);
 - (ii) the next [scheduled read date](#);
 - (iii) the [validated meter reading](#) for that meter; and
 - (iv) a flag indicating that the reading was a Customer-own read,

by 5.00 pm on the next *business day* after the day on which the Customer-own read for a gas meter was validated by the Network Operator or by 5.00 pm on the 5th *business day* after the day on which the Customer-own read for a hot water meter was received by the Network Operator.

[Note: For the purpose of the Gas Interface Protocol, Participant Build Pack 5, the meter reading under \(f\) will be assigned the value of "C" for the purpose of the field "Type of Read" in the Meter Data Notification \(MDN\) transactions](#)

- (g) Where the Network Operator has undertaken a *special read* of the meter that was requested by the FRO for the *delivery point* to which that meter relates, and the actual meter reading is a *validated meter reading*, the Network Operator must use its reasonable endeavours to provide the FRO with the following information:
- (i) the day on which the meter was [read](#);
 - (ii) the next [scheduled read date](#); and
 - (iii) the [validated meter reading](#) for that meter,

by 5.00 pm on the next *business day* after the day on which a gas meter was read or by 5.00 pm on the 4th *business day* after the day on which a hot water meter was read.

[Note: For the purpose of the Gas Interface Protocol, Participant Build Pack 5, the meter reading under \(g\) will be assigned the value of "A" for the purpose of the field "Type of Read" in the Meter Data Notification \(MDN\) transactions](#)

(h) Where:

- (i) the *Network Operator* has undertaken a *special read* of the meter, but the *actual meter reading* is not a *validated meter reading*; or
- (ii) the *Network Operator* has been unable to read the meter on a *special read date*,

the *Network Operator* must use its reasonable endeavours to notify the *User* who requested the *special read* of that fact (and the reason for it), and to specify the next day on which a *special read* of that *meter* can be undertaken by the *Network Operator*, by 5.00 pm on the next *business day* after the *special read date**.

(i) Where the *Network Operator* has substituted a *meter reading* in accordance with an *approved substitution methodology*, the *Network Operator* must use its reasonable endeavours to provide the *FRO* with the following information:

- (i) the date to which the *substituted meter reading* pertains;
- (ii) the *substituted meter reading* (identified as such) for that *meter*;
- (iii) the next *scheduled read date*; and
- (iv) details of the *approved substitution methodology* applied to obtain that *substituted meter reading*,

by 5.00 pm on the next *business day* after the day on which the *substituted meter reading* was calculated.

Note: For the purpose of the *Gas Interface Protocol, Participant Build Pack 5*, the *meter reading* under (i) will be assigned the value of "S" for the purpose of the field "Type of Read" in the *Meter Data Notification (MDN) transactions*

(j) Where the *Network Operator* has been provided with a *Customer-own read (Actual)* by the *Customer* that is a *validated meter reading*, the *Network Operator* must use its reasonable endeavours to provide the *FRO* with the following information:

- (i) the day on which the *meter* was read;
- (ii) the next *schedule read date*;



(iii) the validated meter reading for that meter; and

(iv) a flag indicating that the reading was a Customer-own read (Actual)

by 5.00 pm on the next business day after the day on which the Customer-own read (Actual) for a gas meter was validated by the Network Operator or by 5.00 pm on the 5th business day after the day on which the Customer-own read (Actual) for a hot water meter was received by the Network Operator.

Note: For the purpose of the *Gas Interface Protocol*, Participant Build Pack 5, the meter reading under (j) will be assigned the value of "A" for the purpose of the field "Type of Read" in the Meter Data Notification (MDN) transactions

(k) Where the Network Operator has been provided with a Customer-own read (Actual) by the Customer that is not validated meter reading, the Network Operator must:

(i) Undertake an estimated meter reading as at the date in accordance with clause 3.3; and

(ii) use its reasonable endeavours to provide the FRO with the following information:

(A) the next scheduled read date;

(B) the estimated meter reading (identified as such) for the meter;

(C) the details of the approved estimation methodology applied to obtain that estimated meter reading; and

(D) the reason for the Customer-own read (Actual) not being a validated meter reading.

by 5.00 pm on the 2nd business day after the day on which the Customer-own read (Actual) was provided or by 5.00 pm on the 5th business day after the day on which a Customer-own read (Actual) for a hot water meter was received by the Network Operator.

Note: For the purpose of the *Gas Interface Protocol*, Participant Build Pack 5, the meter reading under (k) will be assigned the value of "E" for the purpose of the field "Type of Read" in the Meter Data Notification (MDN) transactions



ATTACHMENT C - DOCUMENTATION CHANGES – COR (ACTUAL) SRMP

Draft versions of the Customer Own Read (Actual) Methodology has been attached separately to this document. This is a new methodology for NSW/ACT.