

RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)

DRAFT REPORT AND DETERMINATION

Published: **December 2020**





NOTICE OF SECOND STAGE CONSULTATION – RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)

National Electricity Rules – Rule 8.9

Date of Notice: 15 December 2020

This Notice informs all Registered Participants and interested parties (Consulted Persons) that AEMO is commencing the second stage of its consultation on the Retail Procedures (Wholesale Demand Response).

This consultation is being conducted under clause 7.16.1 of the National Electricity Rules (NER), in accordance with the Rules consultation requirements detailed in rule 8.9 of the NER.

Invitation to make Submissions

AEMO invites written submissions on this Draft Report and Determination (Draft Report).

Please identify any parts of your submission that you wish to remain confidential, and explain why. AEMO may still publish that information if it does not consider it to be confidential, but will consult with you before doing so.

Consulted Persons should note that material identified as confidential may be given less weight in the decision-making process than material that is published.

Closing Date and Time

Submissions in response to this Notice should be sent by email to NEM.Retailprocedureconsultations@aemo.com.au, to reach AEMO by 5.00pm (Melbourne time) on 2 February 2021.

All submissions must be forwarded in electronic format (both pdf and Word). Please send any queries about this consultation to the same email address.

Submissions received after the closing date and time will not be valid, and AEMO is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if AEMO does not consider your submission.

Publication

All submissions will be published on AEMO's website, other than confidential content.

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EXECUTIVE SUMMARY

The publication of this Draft Report and Determination (Draft Report) commences the second stage consultation by AEMO on proposed changes to enable the Wholesale Demand Response Mechanism (WDRM) rule change ERC0247 in the National Electricity Market (NEM) under the National Electricity Rules (NER), including clarifying changes in respect of Five Minute Settlement (5MS) and Customer Switching (Customer Switching).

AEMO's draft determination is to amend the following retail procedures and related documents in the form published with this Draft Report:

- Market Settlements and Transfer Solution (MSATS) Procedures: Meter Data Management (MDM) Procedures (MDM Procedures).
- MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations (CATS Procedure).
- MSATS Procedures: Procedure for the Management (Wholesale, Interconnector, Generator and Sample (WIGS)) (WIGS Procedure).
- Metrology Procedure: Part B (Metrology Procedure Part B).
- Retail Electricity Procedures - Glossary and Framework (Glossary and Framework).
- Business-to-Business (B2B) Guide (B2B Guide).
- B2B e-Hub Participant Accreditation and Revocation Process (B2B Participant Process).
- Understanding Load Profiles Published from MSATS (Load Profiles Document).

In summary, the key proposals involve amending:

- Glossary and Framework and Load Profiles Documents to reflect 5MS.
- The Glossary and Framework to capture an additional document reference for Customer Switching.
- B2B Guide and B2B Participant Process, to include the Demand Response Service Provider (DRSP) participant category.
- Retail procedures, to incorporate consequential changes.



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1. STAKEHOLDER CONSULTATION PROCESS

AEMO is consulting on proposed changes to the retail procedures and related documents under NER clause 7.16.1, in accordance with the Rules consultation process in NER rule 8.9.

AEMO's indicative timeline is as follows.

Deliverable	Indicative date
Issues Paper published	12 October 2020
Submissions due on Issues Paper	17 November 2020
Draft Report published	15 December 2020
Submissions due on Draft Report	2 February 2021
Final Report published	16 March 2021

The publication of this Draft Report marks the commencement of the second stage consultation.

A glossary of terms used in this Draft Report is at **Appendix A**.

2. BACKGROUND

2.1. NER requirements

The obligations to establish, maintain and publish the procedures are set out in NER clause 7.16.1.

2.2. Context for this consultation

The Australian Energy Market Commission (AEMC) published the final determination in respect of the WDRM rule change on 11 June 2020. The implementation date for the final rule is 24 October 2021.

The WDRM rule change:

- Introduces the new market participant category, a Demand Response Service Provider (DRSP).
- Places obligations on DRSPs which replicate those applied to scheduled participants, including in respect of information provision and scheduling.
- Sets out the process for the baseline methodologies being determined and applied to wholesale demand response units (WDRUs).
- Provides for DRSPs to be settled in the wholesale market for the wholesale demand response (WDR) which they have provided at the prevailing spot market price.
- Sets out consequential changes to other aspects of the NER, including to Reliability and Emergency Reserve Trader (RERT) provisions.
- Makes additional changes to related aspects of the NER, such as the demand side participation information provisions, to improve the integration of the demand side.

In addition, this consultation proposes including clarifying changes in respect of SMS and Customer Switching, effective on 1 October 2021.

2.3. First stage consultation

AEMO issued the Notice of First Stage Consultation on 12 October 2020.



The key proposals in the Issues Paper involved amending:

- Glossary and Framework and Load Profiles Documents to reflect 5MS.
- The Glossary and Framework to capture an additional document reference for Customer Switching.
- B2B Guide and B2B Participant Process, to include the Demand Response Service Provider (DRSP) participant category.
- Retail procedures, to incorporate consequential changes.

AEMO received 14 written submissions in the first stage consultation.

AEMO also held a workshop with over 100 attendees on 6 November 2020.

Copies of all written submissions, minutes of meetings and issues raised in forums (excluding any confidential information) have been published on AEMO's website at:

<https://aemo.com.au/consultations/current-and-closed-consultations/retail-procedures-wholesale-demand-response>.

3. SUMMARY OF MATERIAL ISSUES

The key material issues arising from the proposal and raised by Consulted Persons are summarised in the following table:

No.	Issue	Raised by
1.	Use of Planned Interruption Notification to Advise DRSP	Multiple parties
2.	DRSP Role in Determining Substitutions under Metrology Procedure	Multiple parties
3.	DRSP Role in Proposing Amendments to B2B Procedures	Red Energy and Lumo Energy

A detailed summary of issues raised by Consulted Persons, together with AEMO's responses, is contained in **Appendix B**.

4. DISCUSSION OF MATERIAL ISSUES

4.1. Use of Planned Interruption Notification to Advise DRSP

4.1.1. Issue summary and submissions

A DRSP will be required to bid the availability of its demand response into the NEM systems for scheduling purposes. Accordingly, the DRSP will need to know when a NMI will be unavailable as a result of a site outage, due to a planned local network outage, or electrical work at the site, for example.

In the Issues Paper, AEMO asked stakeholders whether relevant participants could use the B2B Planned Interruption Notification (PIN) to notify the DRSP of an upcoming outage.

Most respondents agreed that the DRSP would need to be notified of an outage. However, respondents did not support the proposed changes relating to the PIN, for two key reasons:

1. The change would be expensive in terms of systems and processes, especially given the investments already underway to meet other significant changes, including 5MS.
2. The National Energy Retail Rules (NERR) requires certain market participants to provide customers with planned outage notifications. The DRSP relationship with the end use customer should include commercial arrangements to pass on these notifications.



TasNetworks, for example, noted:

"The chief concern TasNetworks has with the use of PINs is that they would require a significant and costly change to its current IT systems. Though TasNetworks has not forecast the cost of such a system change, past experience indicates such a system change would not be possible with internal resources and would therefore be expensive to deliver."

Plus ES recommended that the DRSP could agree with the customer to provide the information directly:

"PLUS ES believes that the best party to notify the DRSP would be the customer themselves, for the following reason:

- *The WDR mechanism is limited to mostly large or wholesale customers*
- *Planned outages may be initiated by various parties: customer, retailer (metering or Disconnection for Non-Payment) or DNSP*
- *The NERR obligates:*
 - *the Retailer and DNSP to provide outage notification to customers. Customer to have received the planned outage notification > 4bus days prior to the outage*
 - *The Retailer must provide multiple notifications to the customer prior to disconnecting them for non-payment.*
- *Any retailer metering planned outages would be mostly customer initiated and by appointment.*
- *The customer would always know of the planned outage.*
- *The customer could also notify the DRSP of unplanned outage occurrences and duration.*
- *The DRSP could implement mechanisms such as agreements, to ensure that the customer provides them that information, especially as there could be compliance implications."*

4.1.2. IEC's assessment

The Information Exchange Committee (IEC) agrees that the DRSP and customer relationship is the lowest-cost method, in contrast to the higher-cost PIN approach. The IEC notes also that a DRSP may choose to receive communications of outage notifications directly with the end user, irrespective of the availability of the PIN.

4.1.3. IEC's conclusion

The changes raised in the questions in the Issues Paper have consequently not been included in the draft B2B Guide.

4.2. DRSP Role in Determining Substitutions under Metrology Procedure

4.2.1. Issue summary and submissions

Evoenergy, AGL, Red Energy and Lumo Energy, as well as Origin Energy, questioned the role of the DRSP in agreeing the use of substitute meter values in respect of clauses 2.2(j), 3.2(g), 3.3.6 and 3.3.8 of the Metrology Procedure Part B. The proposed changes had been included in the first stage consultation as consequential changes arising from the WDRM rule change.

AGL responded, in respect of clause 2.2(j):

"Noted. Although the value of this change may be dependent on whether or not interval data with substitutions affects either the baseline or DRSP payment. If the use of substitution only affects the DB and retailer, and not the DRSP, then there seems no reason for the DRSP to need to be a party to the agreement of a substitution. "



Red Energy and Lumo Energy noted:

“Red and Lumo do not agree to the DRSP being a responsible party for agreeing and subsequently informing the MDP that a previous substitution was inaccurate and that re-substitution of metering data is required. It is not the role of the DRSP to monitor and challenge or validate the substitutions which are used.”

Conversely, Ausnet supported the proposed changes, in particular to clause 2.2(j):

“AusNet Services supports the inclusion of the DRSP role for consultation on re-substitution.”

Endeavour Energy suggested different wording for clauses 3.2(g) and 3.2(h).

4.2.2. AEMO's assessment

The demand response will only be included in the settlement process when the metering data has a quality flag of “A” (Actual) or “F” (Final Substitution). Accordingly, AEMO agrees that MDPs should not be required to seek agreement from the DRSP for relevant substitution types, with the consequence that the Metrology Procedure Part B should be amended accordingly.

4.2.3. AEMO's conclusion

MDPs will not be required to seek agreement from the DRSP for relevant substitution types. The Metrology Procedure Part B has been amended accordingly.

4.3. DRSP Role in Proposing Amendments to B2B Guide

4.3.1. Issue summary and submissions

Red Energy and Lumo Energy did not support the proposed changes to the B2B Procedures to include the DRSP role more broadly.

“Red and Lumo do not support the changes to the B2B Guide. As noted above, we welcome any new DRSPs to join the B2BWG, and propose any amendments to the B2B Procedures and/or B2B Guide through the standard consultation processes.”

Other respondents agreed that the DRSP role should be included in the B2B Guide.

4.3.2. AEMO's assessment

The proposed changes in the B2B Guide are intended in providing a clear indication of which participants may use the B2B transactions relating to the WDRM. Wherever possible, AEMO is looking to reduce or remove any unnecessary barriers to entry for prospective DRSPs.

The IEC has endorsed AEMO proposing the B2B Guide changes and applying the B2B Participant Process change now, to allow new and existing participants to make any system and process changes in preparation for the rule change.

4.3.3. AEMO's conclusion

The IEC and AEMO do not agree with Red Energy and Lumo Energy that the industry should wait for a registered DRSP to propose changes to the B2B Procedures. The need to wait for a DRSP to first register as a market participant, then propose changes to the B2B Procedures, would likely delay the inclusion of DRSPs into the B2B processes, until 2022 at the earliest. The proposed changes in this Draft Report are intended to allow new and existing participants to make decisions in respect of system and process changes, in preparation for the rule change becoming effective.



5. OTHER MATTERS

In the Issues Paper, AEMO asked stakeholders whether they agreed with the proposed changes to provide additional clarification to support 5MS. Generally, respondents agreed with the proposed changes, in some cases recommending minor changes, which have been incorporated into the draft procedures.

Red Energy and Lumo Energy did not agree with the inclusion of the changes to support 5MS, arguing that it was out of scope and that AEMO ended the 5MS-specific consultations when the 5MS Procedural Working Group was closed.

At that time, AEMO advised industry that any future consultations related to 5MS and GS would be included as part of business-as-usual processes. AEMO packages electricity issues into fewer consultation processes, in order to minimise the number of times AEMO consults, so as to lower the burden on industry, as well as AEMO. These two approaches have been applied to this consultation.

6. DRAFT DETERMINATION

Accordingly, AEMO's draft determination is to amend the following retail procedures and related documents in the form published with this Draft Report:

- Market Settlements and Transfer Solution (MSATS) Procedures: Meter Data Management (MDM) Procedures (MDM Procedures).
- MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations (CATS Procedure).
- MSATS Procedures: Procedure for the Management (Wholesale, Interconnector, Generator and Sample (WIGS)) (WIGS Procedure).
- Metrology Procedure: Part B (Metrology Procedure Part B).
- Retail Electricity Procedures - Glossary and Framework (Glossary and Framework).
- Business-to-Business (B2B) Guide (B2B Guide).
- B2B e-Hub Participant Accreditation and Revocation Process (B2B Participant Process).
- Understanding Load Profiles Published from MSATS (Load Profiles Document).



APPENDIX A. GLOSSARY

Term or acronym	Meaning
5MS	Five Minute Settlement
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
B2B	Business to Business
CATS	MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations
DRSP	Demand Response Service Provider
Glossary and Framework	Retail Electricity Procedures - Glossary and Framework
IEC	Information Exchange Committee
MDM Procedures	MSATS Procedures: MDM Procedures
MSATS	Market Settlements and Transfer Solution
NEM	National Electricity Market
NER	National Electricity Rules
NERR	National Energy Retail Rules
NMI	National Metering Identifier
PIN	Planned Interruption Notice
PMD	Provide Meter Data
RERT	Reliability and Emergency Reserve Trader
Understanding Load Profiles	Understanding Load Profiles Published from MSATS
VMD	Verify Meter Data
WDR	Wholesale Demand Response
WDRM	Wholesale Demand Response Mechanism
WDRU	Wholesale Demand Response Unit

APPENDIX B. SUMMARY OF SUBMISSIONS AND AEMO RESPONSES

General Questions

No.	Respondent	Do you agree with the proposed changes to provide additional clarification to support 5MS? If not, please provide an explanation of why you do not support the proposed changes.	AEMO Response
1	Evo Energy	Agree with proposed additions	AEMO notes the respondent's support for the change.
2	EQL	Energex and Ergon Energy Network agree with the proposal.	AEMO notes the respondent's support for the change.
3	Ausnet	AusNet Services supports the proposed changes required to support 5MS.	AEMO notes the respondent's support for the change.
4	Powermetric	Agree	AEMO notes the respondent's support for the change.
5	AGL	The proposed changes should assist. But as a lot of detail is yet to be developed, it seems that this process will need to continue.	AEMO notes the respondent's support for the change.
6	Endeavour	<p>Where a RM report is pushed we suggest that AEMO provide more detail on the parameters of the report, eg the date range of the report, days the report will be run etc, so that participants receiving the RM report are aware of these report parameters.</p> <p>We note that AEMO intends to push some reports, like RM11 and RM26, to MDPs – this will be helpful as these reports are frequently used by MDPS. However, since it is pushed by AEMO the report parameters will be defined by AEMO. For better flexibility we suggest that MDPs be allowed to obtain the RM9, RM11 and RM26 via request and subscription. This will allow MDPs to better manage their obligations and business process by defining when they run the report and the parameters for the report.</p>	AEMO notes the respondent's comments and have not changed the report parameters. AEMO clarified that the reports will now be pushed rather than pulled. AEMO does not intend to build changes for a request and subscription service.
7	Red Lumo	Red Energy and Lumo Energy (Red and Lumo) consider this part of the consultation is out of scope for the Retail Procedures - WDR consultation. This should be run as a separate consultation through the existing 5MS working groups as agreed with the 5MS agreed approach.	AEMO closed the 5MS specific consultations when the 5MS Procedural Working Group was closed. AEMO advised industry at this time that any future consultations related to 5MS and GS would be as per the BAU process. AEMO consolidates electricity issues into one consultation on a regular basis to avoid hosting too many consultations on individual topics. These two approaches have been applied to this consultation.
8	Origin Energy	The proposed changes to incorporate additional clarification to support 5MS changes into the MDM procedures are acceptable.	AEMO notes the respondents support for the change. AEMO agrees to correct the incorrect report reference.



		Please note minor adjustment required to 9.16. Title states MDM RM46, whilst the paragraph content refers to RM43.	
	Question	Do you agree that the DRSP will need to know of planned outages?	AEMO Response
9	Evo Energy	Agree that the DRSP needs to know about planned outages, however, the initiator of an outage may be multiple parties, including the customer. Need to consider communication of unplanned outages, which the LNSP publishes on their websites	AEMO notes the respondent's in principle support. AEMO further notes that customers of DRSP's will likely be more sophisticated in their energy management and will be advised of outages from distributors or retailers and should in turn inform their DRSP of the outage.
10	EQL	Energex and Ergon Energy Network agree.	AEMO notes the respondents in principle support. AEMO further notes that customers of DRSP's will likely be more sophisticated in their energy management and will be advised of outages from distributors or retailers and should in turn inform there DRSP of the outage.
11	Ausnet	AusNet Services supports that the DRSP will need to be aware of planned outages. Planned outage notification will be made available via the AusNet Services website, as per the current process for Retailers. Please note that the NERR does not entitle the DRSP to planned outage notifications.	AEMO notes the respondent's in principle support and refers to the response in Table 1, item 10.
12	Powermetric	Agree	AEMO notes the respondent's in principle support and refers to the response in Table 1, item 10.
13	CitiPower&Powercor	CitiPower Powercor supports the DRSP being notified of a planned interruption.	AEMO notes the respondent's in principle support and refers to the response in Table 1, item 10.
14	United Energy	United Energy supports the DRSP being notified of a planned interruption.	AEMO notes the respondent's in principle support and refers to the response in Table 1, item 10.
15	AGL	AGL would expect that a DRSP would need to have knowledge of planned interruptions as soon as possible to ensure that their portfolio is managed appropriately.	AEMO notes the respondent's in principle support and refers to the response in Table 1, item 10.



16	Endeavour	<p>We agree that a DRSP will need to consider factors that may inhibit the customer's ability to respond to a wholesale demand response activity, which can include:</p> <ul style="list-style-type: none"> - A planned outage initiated by the DNSP - A planned outage initiated by the FRMP - A planned outage initiated by the customer - Unplanned outages 	AEMO notes the respondent's in principle support and refers to the response in Table 1, item 10.
17	Plus ES	<p>PLUS ES agrees that the DRSP would want to know about planned outages as this information would support them in managing their portfolio. There are also unplanned outages with which impacted parties are only aware of them when it occurs. This information would also be beneficial to be received by the DRSP, depending on the compliance requirements for bidding etc.</p>	AEMO notes the respondent's in principle support and refers to the response in Table 1, item 10.
18	Red Lumo	<p>Noting that there is no NERR requirement to provide this information to DRSPs, as such these new parties may choose to agree alternate options with their customers to manage planned and unplanned interruptions. This is out of scope for this consultation.</p>	AEMO notes the respondent's in principle support and refers to the response in Table 1, item 10.
19	Ausgrid	<p>Ausgrid acknowledges that a DRSP will need to be aware of a multitude of varying factors that will need to be considered with regard to a customer's ability to respond to a wholesale demand response event. These would include but not limited to:</p> <ul style="list-style-type: none"> - A planned outage initiated by the customer; - A planned outage initiated by the DNSP; - A metering planned outage initiated by the FRMP; - Unplanned outages. 	AEMO notes the respondent's in principle support and refers to the response in Table 1, item 10.
20	Origin Energy	<p>There is benefit for the DRSP to be made aware of planned outages. As DRSPs will rely on various input data to manage their Demand Response scheduling; the provision of planned outage information would be a component of data required.</p>	AEMO notes the respondent's in principle support and refers to the response in Table 1, item 10.
	Question	<p>Do you agree that a PIN is the best mechanism for advising the DRSP? Does it need to be modified? Is there a better alternative?</p>	



21	Evo Energy	Do not agree. A Distributor makes planned and unplanned outages available on its website due to volume, and notifies the individual customers affected if planned. The Retailer however only has planned outages per site, and use the PIN to inform the Distributor in the rare situation the customer may contact the Distributor 24hr faults and emergency hotline informing of no power. The DRSP should be in communication with their customer/s preplanning such events, thus the customer/s would have been informed by the Retailer or Distributor or, or there own Electrical Contractor, Project Manager, Developer, or Consultant of any planned works.	AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.
22	EQL	The DRSP should be in communication with their customer/s preplanning such events, thus the customer/s would have been informed by the Retailer or Distributor or, or there own Electrical Contractor, Project Manager, Developer, or Consultant of any planned works.	AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.
23	Ausnet	AusNet Services does not support providing planned outage notifications to a DRSP via a PIN OWN B2B transactions as this diverts from current established processes within Victoria and the rest of the NEM. Unlike the FRMP there is no obligation to provide the DRSP with information on planned outages. The introduction of a PIN OWN specifically for DRSPs imposes a significant change to AusNet Services existing systems and processes. AusNet Services proposes that, like retailers, the DRSP should view planned outages via the DBs Website as per the current process with Retailers. Meter data already shows when a site is temporarily without supply and DRSPs would use this to reconcile outages noting they would still need to contend with unplanned outages.	AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.
24	Powermetric	Agree	AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.
25	CitiPower&Powercor	CitiPower Powercor strongly disagrees that a PIN is the appropriate mechanism to advise the DRSP of a distributor initiated planned interruption. Distributors do not use a PIN for any purpose. To introduce the use of a PIN, for a small number of NMLs, would be very costly and complex for it would impact multiple network systems, including those used for market interaction and network management. Current process, where the distributor notifies the customer with at least 4 business days' notice is a better alternative for notification of the DRSP. As the customer is actively involved in a wholesale demand response, initiating or managing changes related to their load or generation, it would then be expected that the customer would advise their DRSP of the upcoming outage.	AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.



26	United Energy	<p>United Energy strongly disagrees that a PIN is the appropriate mechanism to advise the DRSP of a distributor initiated planned interruption. Distributors do not use a PIN for any purpose. To introduce the use of a PIN, for a small number of NMIs, would be very costly and complex for it would impact multiple network systems, including those used for market interaction and network management.</p> <p>Current process, where the distributor notifies the customer with at least 4 business days' notice is a better alternative for notification of the DRSP. As the customer is actively involved in a wholesale demand response, initiating or managing changes related to their load or generation, it would then be expected that the customer would advise their DRSP of the upcoming outage.</p>	<p>AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.</p>
27	AGL	<p>The PIN is one common mechanism which can be used by the retailers.</p> <p>The inclusion of DRSPs as recipients of PINs means that retailers would need to reconfigure their systems to send DRSPs PINS (assuming they were B2B enabled). If DRSPs are not required to be B2B enabled for PINs, then there will be an expenditure undertaken by all retailers to enable this feature, with potentially little use by DRSPs as recipients.</p> <p>Further, while AGL supports a process for provision of planned work, AGL notes that Network interruptions (which are likely to be greater in number than retailer interruptions) need to be included, as do metering issues.</p> <p>Given that some DRSPs may choose not to become B2B enabled, AGL is prepared to make a change that is industry wide, but AGL does not believe that it should be required to additional, manual or bespoke features to meet the information needs of various DRSPs.</p>	<p>AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.</p>



28	Endeavour	<p>Currently we do not send a PIN for planned outages we initiate, instead we notify the customer directly. We wish to highlight that it is not current industry practice for the DNSP to send a PIN for planned outages (see table 1 of the B2B Guide).</p> <p>We note that a PIN would not provide for the following:</p> <ul style="list-style-type: none"> - A planned outage initiated by the customer - Unplanned outages - Extra time required by the customer to ramp down or ramp up their load due to a planned outage initiated by the DNSP or FRMP <p>Should DNSPs be obligated to send a PIN, then there would be significant cost for us and it would be challenging to have it completed by October 2021 due to the complexity and competing priorities of other industry changes.</p> <p>We note that the customer must be aware and be actively involved in a wholesale demand response given that they will have to initiate or manage any changes to their load or generation. Therefore, as an alternative solution, the customer should be responsible for communicating any factors that may prevent them from meeting their obligations, such as planned outages, to the DRSP.</p>	<p>AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.</p>
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29	Plus ES	<p>The PIN would not meet all the DRSP requirements without incurring enhancements to participant processes, operational and system.</p> <p>Currently PINs are used in a flexible manner to inform the recipients of the outage and also support compliant operational driven timeframes. There is no current requirement to provide the planned outage notification in real or near real time.</p> <p>One suspects the DRSP’s requirements would require more near real time updates of planned outages to support their bidding and compliance – To achieve this objective, costly and resource intensive enhancements would be required to develop operational and system processes to support this.</p> <p>The PIN would require the DRSP to be B2B enabled for an industry consistent and efficient process. Otherwise, existing B2B Market Participants would have to develop and implement different mechanisms to provide the information to DRSPs in addition to B2B.</p> <p>A better alternative would be for the customer to inform the DRSP. The DRSP could then determine via what mechanism they would like to be notified by all their customers, when they should be notified and how real time they require the notifications. It would almost provide a 1:1 notification process (customer to DRSP) instead of relying on multiple parties to inform of outages.</p>	<p>AEMO has referred the respondent’s comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.</p>
30	Red Lumo	<p>Changes to the B2B Procedures should follow the normal process, and as such Red and Lumo welcome any new DRSPs to raise any changes they consider necessary through the B2BWG. DRSPs are able to opt to use the existing B2B Procedures or put in place alternate processes. However, Red and Lumo would like to note that DNSPs currently do not use the PIN to notify retailers of their planned outages.</p>	<p>AEMO has referred the respondent’s comments to the IEC and the IEC refers to the response in this Draft Report, section 4.3.</p>
31	SAPN	<p>SA Power Networks do not support the use of the PIN from the DNSP – see further details below.</p>	<p>AEMO has referred the respondent’s comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.</p>



32	TasNetworks	<p>While TasNetworks agrees that Demand Response Service Providers (DRSP) may benefit commercially from knowing about planned outages, it does not agree that Planned Interruption Notices (PIN) are the best way for that information to be provided.</p> <p>The chief concern TasNetworks has with the use of PINs is that they would require a significant and costly change to its current IT systems. Though TasNetworks has not forecast the cost of such a system change, past experience indicates such a system change would not be possible with internal resources and would therefore be expensive to deliver.</p> <p>TasNetworks also contends that such a costly change would only provide benefit to a small number of DRSPs and their customers, while the whole of the customer base would be required to pay for a system upgrade that would not benefit them.</p> <p>TasNetworks would also suggest that, with the large number of IT systems changes already scheduled for the near future, the ability to introduce an additional system change in the timeframes required to meet the October 2021 start date for Wholesale Demand Response may not be achievable.</p> <p>Given these concerns and noting that DNSPs are required to inform their customers of distributor planned outages under section 90 of the National Energy Retail Rules, TasNetworks would suggest that a less costly and more achievable approach would be for DRSPs to be advised of planned outages by their customers. TasNetworks envisions that this could constitute part of the commercial arrangement between a DRSP and its customer.</p>	<p>AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.</p>
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33	Ausgrid	<p>Ausgrid does currently send a PIN for planned outages. We notify the impacted customers directly and publish outage notifications on Ausgrid’s website. It is not current industry practice for the DNSP to send a PIN for planned outages as per the current AEMO B2B Guide.</p> <p>There are limitations of what notification Ausgrid can provide to DRSP, such as:</p> <ul style="list-style-type: none"> - A planned outage initiated by the customer within their electrical installation (Ausgrid has no visibility of this); - Unplanned outages; - Restoration of customer load after a planned outage initiated by the DNSP or FRMP. <p>If Ausgrid were obligated to send a PIN to DRSPs, this would impose a significant cost (in dollars and resources) and it would be difficult to complete by October 2021. Other industry changes such as 5MS, GS and customer switching are already having a significant impact on Ausgrid resources.</p> <p>Ausgrid believes that customers participating in WDR would be well informed of the challenges and limitations on managing their load and generation resources. Ausgrid believes that the most appropriate solution is that the customer and the DRSP should have adequate arrangements and agreements in place to effectively manage load and notification of any interruptions that they, the network or the retailer are planning.</p>	AEMO has referred the respondent’s comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.
34	Origin Energy	<p>The PIN is an effective method to communicate a planned outage to the DRSP.</p> <p>In a practical sense, it would require all DRSPs to be B2B enabled for efficient application of the PIN. It would be cost prohibitive and ineffective for the initiators of the PIN if not all DRSPs were able to receive the PIN by B2B and required alternative method to suit their own communication protocols.</p>	AEMO has referred the respondent’s comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.
	Question	Do you agree that the PIN should be provided to the DRSP by Retailers and Distribution Network Service Providers?	AEMO Response
35	Evo Energy	The PIN should be only issued by the FRMP to relevant parties. All other planned outages are available with the customer/s or their representatives, or on the Distributors website.	AEMO has referred the respondent’s comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.



36	EQL	Energex and Ergon Energy Network do not agree, as per above comments.	AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.
37	Ausnet	AusNet Services does not support the introduction of the PIN OWN for planned outage notification to the DRSPs, as per previous responses.	AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.
38	Powermetric	Agree	AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.
39	CitiPower&Powercor	CitiPower Powercor strongly disagrees that the PIN be used for distributor initiated interruptions for the aforementioned reasons.	AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.
40	United Energy	United Energy strongly disagrees that the PIN be used for distributor initiated interruptions for the aforementioned reasons.	AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.
41	AGL	From a retail perspective, the PIN would be the most consistent mechanism. DNSPs generally do not use PINs, so that may leave a DRSP with a gap in their knowledge of planned outages, or there would need to be a requirement for DNSPs to provide PINs.	AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.
42	Endeavour	We disagree for the reasons provided above	AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.



43	Plus ES	<p>PLUS ES believes that the best party to notify the DRSP would be the customer themselves, for the following reason:</p> <ul style="list-style-type: none"> -The WDR mechanism is limited to mostly large or wholesale customers -Planned outages may be initiated by various parties: customer, retailer (metering or Disconnection for Non-Payment) or DNSP -The NERR obligates: <ul style="list-style-type: none"> - the Retailer and DNSP to provide outage notification to customers. Customer to have received the planned outage notification > 4bus days prior to the outage - The Retailer must provide multiple notifications to the customer prior to disconnecting them for non-payment. -Any retailer metering planned outages would be mostly customer initiated and by appointment. -The customer would always know of the planned outage. -The customer could also notify the DRSP of unplanned outage occurrences and duration. -The DRSP could implement mechanisms such as agreements, to ensure that the customer provides them that information, especially as there could be compliance implications. 	<p>AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.</p>
44	Red Lumo	<p>Changes to the B2B Procedures should follow the normal process, and as such Red and Lumo welcome any new DRSPs to raise any changes they consider necessary through the B2BWG.Red and Lumo would like to note that DNSPs currently do not use the PIN to notify retailers of their planned outages and would welcome DNSPs providing these to retailers ASAP.</p>	<p>AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.</p>



45	SAPN	<p>SA Power Networks do not support the PIN being provided to the DRSP from Distributors.</p> <p>Current B2B Procedure requirements do not mandate the use of this transaction and SA Power Networks do not have any system capabilities to create or provide the PIN to any market participant.</p> <p>SA Power Networks suggest that AEMO provide justification (expected volumes of DSRP's and sites likely to provide WDR via the DSRP within each jurisdiction) to allow more accurate assessment of this requirement.</p> <p>Development of this capability would require significant system and process investment costs by SA Power Networks (not achievable by 24 October 2021), which will ultimately increase costs to customers. With WDR information currently available to SA Power Networks and our understanding of how WDR will operate, we do not believe the requirement or costs involved in providing the PIN are justifiable.</p> <p>Information related to Planned Interruptions are provided to the impacted customer directly and published on our website. The information published on our website is where Retailers are directed to source current information they may require.</p> <p>We would expect that the DRSP would be required to actively engage directly with their customer in performing the DRSP role, regularly confirming commitments that the customer is able to provide any demand response. This regular DRSP and customer engagement should include the sourcing of any planned activities (including but not limited to supply outages) that would impact the site and impact on available WDR. Additionally, the DRSP (like Retailers) could use information published on our website to support any information requirements.</p>	<p>AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.</p>
46	Ausgrid	<p>Ausgrid does not agree the PIN is the best solution for the reasons outlined above.</p>	<p>AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.</p>
47	Origin Energy	<p>B2B is the most efficient method to communicate market transactions between participants. The PIN is a transaction used extensively today by Retailers. It would be prudent for both Retailers and LNSP to be consistent in the use of the One Way Notification – Planned Interruption notice as per the B2B guide. Origin are against allowing different communication methods and options for DRSPs to request their own method of communication as this introduces inefficiencies and cost for what may be small volumes of transactions.</p>	<p>AEMO has referred the respondent's comments to the IEC and the IEC will not be pursuing changes to the PIN process at this stage.</p>



	Question	Do you agree with the proposed amendments to the retail procedures which are included in this consultation package as change marked versions?	AEMO Response
48	Evo Energy	I would have to say No. See comments against each procedure	AEMO notes the respondent's comments.
49	EQL	Energex and Ergon Energy Network agree.	AEMO notes the respondent's support for the change.
50	Ausnet	AusNet Services support the proposed amendments.	AEMO notes the respondent's support for the change.
51	Powermetric	See comments below	AEMO notes the respondent's comments.
52	AGL	<p>Generally, those proposed changes make sense. However, there are other process changes (eg Meter fault exemption notices issued by AEMO) which should be reviewed.</p> <p>Depending on what level of meter data accuracy is required for a site to be included in a demand program event will drive the market requirements and the DRSPs obligations. This also includes making the DRSP a party to meter data substitutions. The DRSP inclusion may not be warranted, if the need for substitutions removes the NMI from a WDR event.</p>	AEMO notes the respondent's support for the change. The DRSP will only be settled when the metering data has a quality flag of "A" or "F". MDPs will now no longer be required to seek agreement from the DRSP for relevant substitution types. The Metrology Procedure Part B will be amended accordingly.
53	Red Lumo	Red and Lumo does not support all the changes as proposed. Please see individual feedback for each proposed change as detailed below.	AEMO notes the respondent's comments.
54	Origin Energy	Yes, please refer relevant feedback as applicable	AEMO notes the respondent's support for the change.
	Question	Do you agree with the Change Requests that have been flagged for DRSPs to receive completion notifications?	
55	Evo Energy	Is the NSP2 participant also notified of these? If yes then Agree, else No.	AEMO notes the respondent's support for the change as where the NSP2 has a relationship with that NMI, they will received notifications.
56	EQL	Energex and Ergon Energy Network agree.	AEMO notes the respondent's support for the change.
57	Ausnet	AusNet Services supports the receipt of COMPLETED notifications for the Change Requests identified.	AEMO notes the respondent's support for the change and that notifications will only be provided at the COMPLETED stage.
58	Powermetric	See comments below	AEMO notes the respondent's comments.
59	AGL	In MSATS – yes.	AEMO notes the respondent's support for the change.
60	Red Lumo	Red and Lumo support the DRSP having visibility of the completion of these change requests, and want to ensure that this does not go beyond the DRSP having the ability to take any action on these change requests - including reject, object, or raise the Change Request. Furthermore, Red and Lumo would like to confirm that the ability to request any amendments to the tariff will remain between the retailer and the LNSP, and not the DRSP?	AEMO notes the respondent's support for the change and that the DRSP will not be able to perform any of the tasks listed in the respondent's feedback.



61	Origin Energy	Yes, please refer feedback as per each procedure section	AEMO notes the respondent's support for the change.
	Question	Do you agree with the proposed changes to the B2B Guide? If not, please provide an explanation of why you do not support the proposed changes.	
62	Evo Energy	Is the NSP2 participant also allowed to raise these? If yes then Agree, else No.	The IEC notes that the NSP2 role is not a current role in the B2B processes.
63	EQL	Energex and Ergon Energy Network agree.	IEC notes the respondent's support for the change.
64	Ausnet	AusNet Services supports the proposed changes to the B2B Guide.	IEC notes the respondent's support for the change.
65	Powermetric	See comments below	IEC notes the respondent's comments.
66	AGL	At this time the retail workshop for WDR did not cover B2B Service Orders, meter faults and MC obligations, therefore there may be unconsidered gaps in the proposals. It seemed evident from the workshop on Nov 6, that the introduction of the DRSP has more implications than have been currently discussed.	The IEC notes the respondent's comments. Participants are encouraged to provide additional information to the IEC or the next round of consultation, as they see necessary, where it will be considered by the IEC.
67	Red Lumo	Red and Lumo do not support the changes to the B2B Guide. We welcome new DRSPs to join the B2BWG and discuss any amendments to the B2B Procedures and/or B2B Guide through the standard consultation processes.	The IEC notes the respondent's comments.
68	Origin Energy	Yes, please refer relevant feedback as applicable	The IEC notes the respondent's support for the change.
	Question	Do you agree with the proposed changes to the B2B Participant Process? If not, please provide an explanation of why you do not support the proposed changes.	
69	Evo Energy	Does the NSP2 participant also have the same? If yes then Agree, else No.	The IEC notes that the NSP2 role is not a current role in the B2B processes.
70	EQL	Energex and Ergon Energy Network agree.	AEMO notes the respondent's support for the change.
71	Ausnet	AusNet Services supports the proposed changes to the B2B Participant Process.	AEMO notes the respondent's support for the change.
72	Powermetric	See comments below	AEMO notes the respondent's comments.
73	AGL	The changes as outlines so far seem reasonable. However, changes to the Metrology Procedures need further discussion.	AEMO notes the respondent's comments. Participants are encouraged to provide additional information to AEMO in the next round of consultation, as they see necessary, where it will be considered by the AEMO.
74	Red Lumo	Red and Lumo does not support all the changes as proposed. Please see individual feedback for each proposed change as detailed below.	AEMO notes the respondent's comments.
75	Origin Energy	Yes	AEMO notes the respondent's support for the change
	Question	Are there any other changes to the B2B Guide that need to be made to support WDR?	
76	Evo Energy	No comment	



RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)



77	EQL	Energex and Ergon Energy Network are requesting further clarity regarding OWNs required by the DRSP (see detailed feedback below).	The IEC notes the respondent's comment, the IEC will be informed as to whether a DRSP would use these notifications once a DNSP requests this usage.
78	Ausnet	AusNet Services has not identified additional changes required to the B2B Guide to support WDR.	The IEC notes the respondent's comments.
79	Powermetric	No comment	
80	AGL	This will depend on further developments.	AEMO notes the respondent's comments.
81	Red Lumo	Red and Lumo do not support the changes to the B2B Guide. We welcome new DRSPs to join the B2BWG and discuss any amendments to the B2B Procedures and/or B2B Guide through the standard consultation processes.	The IEC notes the respondent's comments.
	Question	Are there any other WDR related issues which AEMO should consider in respect of the retail procedures including the B2B Procedures?	
82	Evo Energy	Metrology Part B and SLP. There should be a standard set of circumstances where no agreements required, such as meter or comms faults, null data, (plus a few others) where the MDP can use an Agreed method. These should be listed in the SLP, and all others require agreement. Possibly review in 2022 after GS.	AEMO notes that this response is out of scope for this consultation. If the respondent wishes to pursue this matter further, they should raise an ICF.
83	EQL	Energex and Ergon Energy Network are seeking clarification of the B2B functionality that will go-live to support participant registration from 24 June 2021.	There are no changes to B2B functionality contemplated in this consultation package.
84	Ausnet	AusNet Services has not identified any related issues for AEMO's consideration, in regard to the retail procedures to support WDR.	AEMO notes the respondent's comments.
85	Powermetric	No comment	
86	AGL	The proposed changes to the Metrology Procedures need underpinning information. It may be unnecessary for DRSPs to be a party to substitution agreements, if those meter data segments are not part of a DRSP's settlement, in which case, only the affected parties should be involved.	AEMO notes the respondent's comment and refers to the response in Table 1, item 52.



87	Endeavour	<p>It is not clear if the scenario where a meter becomes faulty or communications with the meter cannot be established has been considered. Although metering data can be substituted it may have adverse financial impacts, either to the customer or to the FRMP, if substitution is required for a period covering a wholesale demand response event. We suggest AEMO considers the following:</p> <ul style="list-style-type: none"> - Not approve a NMI to be registered to be a wholesale demand response unit if AEMO is aware that the meter is faulty or that communications with the meter cannot be established. - AEMO considered the implications on WDR when considering a meter fault exemption application - AEMO not allow a WDR NMI to bid if AEMO is aware of a meter fault that is not fixed within the timeframe and there is no approved exemption, the exemption has expired or the exemption is revoked <p>Other matters for AEMO's consideration are:</p> <ul style="list-style-type: none"> - How will AEMO communicate to the DNSP that there is a DRSP for a market child NMI, noting that a DNSP is not associated with a market child NMI but changes to the energy at a market child NMI impacts the DNSP via the parent NMI? - How will AEMO communicate which NMIs are associated with an WDRU aggregation so that the DNSP can consider if the aggregation is or will likely impact on the performance of the network? - How will AEMO make visible to participants like MDPs and DNSPs that a wholesale demand response occurred for a NMI so that exception to meter data validations (for example significant drop in load) can be managed in an efficient manner? 	<p>AEMO notes the respondent's comment and refers to the response in Table 1, item 52.</p>
88	Plus ES	<p>MDPs would also require to understand when a DR event has occurred to assist them with analysis and enquiries with respect to metering data i.e. Information such as the duration of the event and the impact to the normal load.</p>	<p>AEMO notes the respondent's comment. AEMO is not aware of a scenario where the MDP needs to know this information. AEMO requests the respondent to provide examples or more information as to why this would be an important requirement.</p>



89	Red Lumo	AEMO should not be making amendments to the B2B Procedures on behalf of DRSPs. DRSPs should register with AEMO, request to be a third party B2B participant and join the IEC/B2BWG to participate.	AEMO notes the respondent's comment. AEMO is not amending the B2B Procedures governed by the IEC. The B2B e-Hub Participant Accreditation and Revocation Process is a document governed by AEMO to enable AEMO's management of the B2B e-Hub under NER clause 7.17.2. The B2B Guide changes have been discussed with the IEC. As part of this consultation process, AEMO is asking industry if there are any B2B changes required that have not been identified. AEMO also notes that a DRSP will be a registered market participant and will seek B2B e-Hub accreditation as a Third Party B2B Participant.
90	Origin Energy	Origin questions how AEMO will consider life support as part of the WDRM registration process given Life Support is not part of Standing Data?	WDR only applies to Large customers. It would seem logical that demand reduction would be inherently unsuitable for sites with life support customers. LEGAL

CATS Procedures

No.	Section	Consulted Person	Respondent Comments	AEMO Response
91	2.9	Evo Energy	Nothing to add	
92	2.9	EQL	Energex and Ergon Energy Network request further clarification on the NMIs that are eligible to register with a DRSP. Specifically, further detail should be provided around eligible Metering Installation Type codes that can have a DRSP applied e.g. LARGE NMI Class with BASIC metering.	AEMO notes the respondent's comments. The WDR guideline will specify metering types (interval meters only).



93	2.9	Ausnet	<p>Wording is misleading, the first sentence indicates that DRSP can only be applied to Large or Wholesale NMI Classifications but the subsequent sentence also includes SMALL NMI Classifications. Suggest this be reworded as per below;</p> <p>The DRSP is assigned to NMI's where the loads have been classified as wholesale demand response units for which the DRSP is responsible. A DRSP can only be assigned to NMIs with the following NMI Classifications:</p> <ul style="list-style-type: none"> · LARGE; · WHOLESAL; or · SMALL (where the End User has entered into an agreement with its retailer in accordance with rule 5(2)(a) of the National Energy Retail Rules to aggregate the premises referred to in subparagraph (2)(i) with other premises). 	<p>AEMO notes the respondent's comments. AEMO has updated the procedures accordingly.</p>
94	2.9	Powermetric	<p>No comment</p>	
95	2.9	AGL	<p>Noted.</p>	
96	2.9	Endeavour	<p>The reference to subparagraph (2)(i) is confusing because it is not clear what this is referring to. We understand that this is meant to reference clause 2.3.6.m.2.i of the NER – if this is correct then we suggest that this be made clearer, if this is not correct then could you please clarify what clause it is referring to?</p> <p><u>2.9. Demand Response Service Provider (DRSP)</u></p> <p><u>The DRSP is assigned to NMI's where the loads have been classified as wholesale demand response units for which the DRSP is responsible. A DRSP can only be assigned to NMIs with the following NMI Classifications:</u></p> <ul style="list-style-type: none"> • <u>LARGE</u> • <u>WHOLESAL</u> <p><u>Or a SMALL NMI Classification where the End User has entered into an agreement with its retailer in accordance with rule 5(2)(a) of the National Energy Retail Rules to aggregate the premises referred to in subparagraph (2)(i) with other premises.</u></p>	<p>AEMO notes the respondent's comment and refers to the response in Table 1, item 93.</p>



97	2.9	Red Lumo	Red and Lumo support this change on the proviso that the population and maintenance of the field by AEMO is undertaken in an appropriate timeframe. Please see our response below	AEMO notes the respondent's comment, AEMO will update MSATS in a timely manner when the registration of a DRSP has been approved and a load has been classified. AEMO notes that a DRSP will not be able to bid the WDRU until the MSATS role assignment of the DRSP has completed. AEMO has added a two business day obligation to the requirement.
98	2.9	Origin Energy	Noted	
99	2.10(h)	Evo Energy	No further comment	
100	2.10(h)	EQL	Energex and Ergon Energy Network have no comments.	
101	2.10(h)	Ausnet	Agreed.	AEMO notes the respondent's support for the change
102	2.10(h)	Powermetric	How will MP's and MDP's know when AEMO have assigned a DRSP to a NMI?	Participants who are party to a NMI will received a notification from MSATS.
103	2.10(h)	AGL	Noted.	
104	2.10(h)	Red Lumo	Red and Lumo would like to understand the timing obligations which AEMO will put in place and adhere to update this information in MSATS. The information will need to be updated in advance to ensure that retailers are aware of a DRSP being assigned to a NMI. This timing requirement allows for retailers to change their forecasts/profiles etc in a timely manner. This includes updating the field with the DRSP, changing when a new DRSP takes over, and removing any DRSPs when there are no longer any associated with the NMI.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
105	2.10(h)	Origin Energy	Noted	
106	6.1.8	Evo Energy	No further comment	
107	6.1.8	EQL	Energex and Ergon Energy Network have no comments.	
108	6.1.8	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
109	6.1.8	Powermetric	No comment	
110	6.1.8	AGL	Noted.	



111	6.1.8	Red Lumo	Red and Lumo support the DRSP having visibility of the completion of these change requests, and want to ensure that this does not go beyond the DRSP having the ability to take any action on these change requests - including reject, object, or raise the Change Request. Furthermore, Red and Lumo would like to confirm that the ability to request any amendments to the tariff will remain between the retailer and the LNSP, and not the DRSP?	AEMO notes the respondent's comments. MSATS provides notification on completion of any change request for a NMI where a DRSP is assigned. The DRSP will not have the ability to perform any of the transactions suggested in the respondent's comments.
112	6.1.8	Origin Energy	Noted	
113	6.2.8	Evo Energy	No further comment	
114	6.2.8	EQL	Energex and Ergon Energy Network have no comments.	
115	6.2.8	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
116	6.2.8	Powermetric	No comment	
117	6.2.8	AGL	Noted.	
118	6.2.8	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
119	6.2.8	Origin Energy	Noted	
120	10.1.7	Evo Energy	No further comment	
121	10.1.7	EQL	Energex and Ergon Energy Network have no comments.	
122	10.1.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
123	10.1.7	Powermetric	No comment	
124	10.1.7	AGL	Noted.	
125	10.1.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
126	10.1.7	Origin Energy	Noted	
127	10.2.7	Evo Energy	No further comment	
128	10.2.7	EQL	Energex and Ergon Energy Network have no comments.	
129	10.2.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
130	10.2.7	Powermetric	No comment	
131	10.2.7	AGL	Noted.	
132	10.2.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.



RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)



133	10.2.7	Origin Energy	Noted	
134	10.3.7	Evo Energy	No further comment	
135	10.3.7	EQL	Energex and Ergon Energy Network have no comments.	
136	10.3.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
137	10.3.7	Powermetric	No comment	
138	10.3.7	AGL	Noted.	
139	10.3.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
140	10.3.7	Origin Energy	Noted	
141	10.4.8	Evo Energy	No further comment	
142	10.4.8	EQL	Energex and Ergon Energy Network have no comments.	
143	10.4.8	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
144	10.4.8	Powermetric	No comment	
145	10.4.8	AGL	Noted.	
146	10.4.8	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
147	10.4.8	Origin Energy	Noted	
148	10.5.8	Evo Energy	No further comment	
149	10.5.8	EQL	Energex and Ergon Energy Network have no comments.	
150	10.5.8	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
151	10.5.8	Powermetric	No comment	
152	10.5.8	AGL	Noted.	
153	10.5.8	Red Lumo	Comments to 6.1.8 apply to this clause.	see AEMO response to 6.1.8
154	10.5.8	Origin Energy	Noted	
155	10.6.7	Evo Energy	No further comment	
156	10.6.7	EQL	Energex and Ergon Energy Network have no comments.	
157	10.6.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
158	10.6.7	Powermetric	No comment	



159	10.6.7	AGL	Noted – but is this relevant to the DRSP?	AEMO notes the respondent’s support for the change. AEMO is satisfied that the DRSP will find this information useful in any commercial discussions with end use customers.
160	10.6.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent’s comment and refers to the response in Table 1, item 97.
161	10.6.7	Origin Energy	Noted	
162	11.1.7	Evo Energy	No further comment	
163	11.1.7	EQL	Energex and Ergon Energy Network have no comments.	
164	11.1.7	Ausnet	Agreed.	AEMO notes the respondent’s support for the change.
165	11.1.7	Powermetric	No comment	
166	11.1.7	AGL	Noted.	
167	11.1.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent’s comment and refers to the response in Table 1, item 97.
168	11.1.7	Origin Energy	Noted	
169	11.2.7	Evo Energy	No further comment	
170	11.2.7	EQL	Energex and Ergon Energy Network have no comments.	
171	11.2.7	Ausnet	Agreed.	AEMO notes the respondent’s support for the change.
172	11.2.7	Powermetric	No comment	
173	11.2.7	AGL	Noted.	
174	11.2.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent’s comment and refers to the response in Table 1, item 97.
175	11.2.7	Origin Energy	Noted	
176	11.3.7	Evo Energy	No further comment	
177	11.3.7	EQL	Energex and Ergon Energy Network have no comments.	
178	11.3.7	Ausnet	Agreed.	AEMO notes the respondent’s support for the change.
179	11.3.7	Powermetric	No comment	
180	11.3.7	AGL	Noted.	
181	11.3.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent’s comment and refers to the response in Table 1, item 97.



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182	11.3.7	Origin Energy	Noted	
183	12.3.7	Evo Energy	No further comment	
184	12.3.7	EQL	Energex and Ergon Energy Network have no comments.	
185	12.3.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
186	12.3.7	Powermetric	No comment	
187	12.3.7	AGL	Noted.	
188	12.3.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
189	12.3.7	Origin Energy	Noted	
190	12.4.7	Evo Energy	No further comment	
191	12.4.7	EQL	Energex and Ergon Energy Network have no comments.	
192	12.4.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
193	12.4.7	Powermetric	No comment	
194	12.4.7	AGL	Noted.	
195	12.4.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
196	12.4.7	Origin Energy	Noted	
197	12.5.7	Evo Energy	No further comment	
198	12.5.7	EQL	Energex and Ergon Energy Network have no comments.	
199	12.5.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
200	12.5.7	Powermetric	No comment	
201	12.5.7	AGL	Noted.	
202	12.5.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
203	12.5.7	Origin Energy	Noted	
204	12.6.7	Evo Energy	No further comment	
205	12.6.7	EQL	Energex and Ergon Energy Network have no comments.	
206	12.6.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.



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207	12.6.7	Powermetric	No comment	
208	12.6.7	AGL	Noted.	
209	12.6.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
210	12.6.7	Origin Energy	Noted	
211	13.1.7	Evo Energy	No further comment	
212	13.1.7	EQL	Energex and Ergon Energy Network have no comments.	
213	13.1.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
214	13.1.7	Powermetric	No comment	
215	13.1.7	AGL	Noted.	
216	13.1.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
217	13.1.7	Origin Energy	Noted	
218	13.2.8	Evo Energy	No further comment	
219	13.2.8	EQL	Energex and Ergon Energy Network have no comments.	
220	13.2.8	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
221	13.2.8	Powermetric	No comment	
222	13.2.8	AGL	Noted.	
223	13.2.8	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
224	13.2.8	Origin Energy	Noted	
225	13.3.7	Evo Energy	No further comment	
226	13.3.7	EQL	Energex and Ergon Energy Network have no comments.	
227	13.3.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
228	13.3.7	Powermetric	No comment	
229	13.3.7	AGL	Noted.	
230	13.3.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
231	13.3.7	Origin Energy	Noted	



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232	13.4.7	Evo Energy	No further comment	
233	13.4.7	EQL	Energex and Ergon Energy Network have no comments.	
234	13.4.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
235	13.4.7	Powermetric	No comment	
236	13.4.7	AGL	Noted.	
237	13.4.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
238	13.4.7	Origin Energy	Noted	
239	13.5.7	Evo Energy	No further comment	
240	13.5.7	EQL	Energex and Ergon Energy Network have no comments.	
241	13.5.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
242	13.5.7	Powermetric	No comment	
243	13.5.7	AGL	Noted.	
244	13.5.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
245	13.5.7	Origin Energy	Noted	
246	13.6.7	Evo Energy	No further comment	
247	13.6.7	EQL	Energex and Ergon Energy Network have no comments.	
248	13.6.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
249	13.6.7	Powermetric	No comment	
250	13.6.7	AGL	Noted.	
251	13.6.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
252	13.6.7	Origin Energy	Noted	
253	13.7.8	Evo Energy	No further comment	
254	13.7.8	EQL	Energex and Ergon Energy Network have no comments.	
255	13.7.8	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
256	13.7.8	Powermetric	No comment	



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257	13.7.8	AGL	Noted.	
258	13.7.8	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
259	13.7.8	Origin Energy	Noted	
260	13.8.9	Evo Energy	No further comment	
261	13.8.9	EQL	Energex and Ergon Energy Network have no comments.	
262	13.8.9	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
263	13.8.9	Powermetric	No comment	
264	13.8.9	AGL	Noted.	
265	13.8.9	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97..
266	13.8.9	Origin Energy	Noted	
267	14.1.5	Evo Energy	No further comment	
268	14.1.5	EQL	Energex and Ergon Energy Network have no comments.	
269	14.1.5	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
270	14.1.5	Powermetric	No comment	
271	14.1.5	AGL	Noted.	
272	14.1.5	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
273	14.1.5	Origin Energy	Noted	
274	14.2.5	Evo Energy	No further comment	
275	14.2.5	EQL	Energex and Ergon Energy Network have no comments.	
276	14.2.5	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
277	14.2.5	Powermetric	No comment	
278	14.2.5	AGL	Noted.	
279	14.2.5	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
280	14.2.5	Origin Energy	Noted	
271	15.1.4(d)	Evo Energy	No further comment	



282	15.1.4(d)	EQL	Energex and Ergon Energy Network have no comments.	
283	15.1.4(d)	Ausnet	AusNet Services supports the inclusion of the RoLR, NSP2, DRSP and TNI Code 2 fields within CRC5100/1.	AEMO notes the respondent's support for the change.
284	15.1.4(d)	Powermetric	No comment	
285	15.1.4(d)	AGL	Noted.	
286	15.1.4(d)	Red Lumo	Red and Lumo would like to understand the timing obligations which AEMO will put in place and adhere to for updating this information in MSATS. The information will need to be updated in advance to ensure that retailers are aware of a DRSP being assigned to a NMI. This timing requirement allows for retailers to change their forecasts/profiles etc in a timely manner.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
287	15.1.4(d)	Origin Energy	Noted	
288	15.1.7	Evo Energy	No further comment	
289	15.1.7	EQL	Energex and Ergon Energy Network have no comments.	
290	15.1.7	Ausnet	AusNet Services supports the inclusion of the DRSP and NSP2 roles for receipt of the COMPLETED notification for CRC 5100/5101	AEMO notes the respondent's support for the change.
291	15.1.7	Powermetric	No comment	
292	15.1.7	AGL	Noted.	
293	15.1.7	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
294	15.1.7	Origin Energy	Noted	
295	Table 16-C	Evo Energy	No further comment	
296	Table 16-C	EQL	Energex and Ergon Energy Network have no comments.	
297	Table 16-C	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
298	Table 16-C	Powermetric	No comment	



299	Table 16-C	AGL	Noted. Although we also note that the DRSP is not included in: Previous Read Dates Previous Read Quality Flag	AEMO notes that the DRSP is not involved in the customer transfer process and the DRSP will not be able to perform NMI Discovery
300	Table 16-C	Red Lumo	Comments to 6.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 97.
301	Table 16-C	Origin Energy	DRSP do not get read type code returned in NMI discovery. As this field is being populated as part of MSATS review and meters provisioning 5 minute data, this information may be of value to the DRSP.	AEMO notes that the DRSP is not able to perform a NMI Discovery.

WIGS Procedures

No.	Section	Consulted Person	Respondent comment	AEMO Response
302	Description	Evo Energy	Agree	AEMO notes the respondent's support for the change.
303	Description	EQL	Energex and Ergon Energy Network have no comments.	
304	Description	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
305	Description	Powermetric	No comment	
306	Description	AGL	Noted.	
307	Description	Red Lumo	Noted	
308	Description	Origin Energy	Noted	
309	2.1.8	Evo Energy	No further comment	
310	2.1.8	EQL	Energex and Ergon Energy Network have no comments.	
311	2.1.8	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
312	2.1.8	Powermetric	No comment	



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313	2.1.8	AGL	Noted.	
314	2.1.8	Red Lumo	Red and Lumo support the DRSP having visibility of the completion of these change requests, however as a DRSP does not have FRMP obligations at the site, the DRSP must not have the ability to take any action on these change requests - including reject, object or raise the Change Request. Furthermore, Red and Lumo would like to confirm that the ability to request any amendments to the tariff will remain between the retailer and the LNSP, and not the DRSP?	AEMO notes the respondent's comments. MSATS provides notification on completion of any change request for a NMI where a DRSP is assigned. The DRSP will not have the ability to perform any of the transactions suggested in the respondent's comments.
315	2.1.8	Origin Energy	Noted	
316	2.2.8	Evo Energy	No further comment	
317	2.2.8	EQL	Energex and Ergon Energy Network have no comments.	
318	2.2.8	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
319	2.2.8	Powermetric	No comment	
320	2.2.8	AGL	Noted.	
321	2.2.8	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314.
322	2.2.8	Origin Energy	Noted	
323	5.2.7	Evo Energy	No further comment	
324	5.2.7	EQL	Energex and Ergon Energy Network have no comments.	
325	5.2.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
326	5.2.7	Powermetric	No comment	
327	5.2.7	AGL	Noted.	
328	5.2.7	Red Lumo	Comments to 2.1.8 apply to this clause.	
329	5.2.7	Origin Energy	Noted	
330	5.3.7	Evo Energy	No further comment	
331	5.3.7	EQL	Energex and Ergon Energy Network have no comments.	
332	5.3.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
333	5.3.7	Powermetric	No comment	
334	5.3.7	AGL	Noted.	



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335	5.3.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
336	5.3.7	Origin Energy	Noted	
337	5.4.7	Evo Energy	No further comment	
338	5.4.7	EQL	Energex and Ergon Energy Network have no comments.	
339	5.4.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
340	5.4.7	Powermetric	No comment	
341	5.4.7	AGL	Noted.	
342	5.4.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
343	5.4.7	Origin Energy	Noted	
344	5.5.7	Evo Energy	No further comment	
345	5.5.7	EQL	Energex and Ergon Energy Network have no comments.	
346	5.5.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
347	5.5.7	Powermetric	No comment	
348	5.5.7	AGL	Noted.	
349	5.5.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
350	5.5.7	Origin Energy	Noted	
351	6.1.7	Evo Energy	No further comment	
352	6.1.7	EQL	Energex and Ergon Energy Network have no comments.	
353	6.1.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
354	6.1.7	Powermetric	No comment	
355	6.1.7	AGL	Noted.	
356	6.1.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
357	6.1.7	Origin Energy	Noted	
358	6.2.7	Evo Energy	No further comment	
359	6.2.7	EQL	Energex and Ergon Energy Network have no comments.	



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360	6.2.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
361	6.2.7	Powermetric	No comment	
362	6.2.7	AGL	Noted.	
363	6.2.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
364	6.2.7	Origin Energy	Noted	
365	6.3.7	Evo Energy	No further comment	
366	6.3.7	EQL	Energex and Ergon Energy Network have no comments.	
367	6.3.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
368	6.3.7	Powermetric	No comment	
369	6.3.7	AGL	Noted.	
370	6.3.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
371	6.3.7	Origin Energy	Noted	
372	7.2.6	Evo Energy	No further comment	
373	7.2.6	EQL	Energex and Ergon Energy Network have no comments.	
374	7.2.6	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
375	7.2.6	Powermetric	No comment	
376	7.2.6	AGL	Noted.	
377	7.2.6	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
378	7.2.6	Origin Energy	Noted	
379	7.3.7	Evo Energy	No further comment	
380	7.3.7	EQL	Energex and Ergon Energy Network have no comments.	
381	7.3.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
382	7.3.7	Powermetric	No comment	
383	7.3.7	AGL	Noted.	



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384	7.3.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
385	7.3.7	Origin Energy	Noted	
386	7.4.7	Evo Energy	No further comment	
387	7.4.7	EQL	Energex and Ergon Energy Network have no comments.	
388	7.4.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
389	7.4.7	Powermetric	No comment	
390	7.4.7	AGL	Noted.	
391	7.4.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
392	7.4.7	Origin Energy	Noted	
393	8.1.7	Evo Energy	No further comment	
394	8.1.7	EQL	Energex and Ergon Energy Network have no comments.	
395	8.1.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
396	8.1.7	Powermetric	No comment	
397	8.1.7	AGL	Noted.	
398	8.1.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
399	8.1.7	Origin Energy	Noted	
400	8.2.9	Evo Energy	No further comment	
401	8.2.9	EQL	Energex and Ergon Energy Network have no comments.	
402	8.2.9	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
403	8.2.9	Powermetric	No comment	
404	8.2.9	AGL	Noted.	
405	8.2.9	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
406	8.2.9	Origin Energy	Noted	
407	8.3.7	Evo Energy	No further comment	
408	8.3.7	EQL	Energex and Ergon Energy Network have no comments.	



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409	8.3.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
410	8.3.7	Powermetric	No comment	
411	8.3.7	AGL	Noted.	
412	8.3.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
413	8.3.7	Origin Energy	Noted	
414	8.4.7	Evo Energy	No further comment	
415	8.4.7	EQL	Energex and Ergon Energy Network have no comments.	
416	8.4.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
417	8.4.7	Powermetric	No comment	
418	8.4.7	AGL	Noted.	
419	8.4.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
420	8.4.7	Origin Energy	Noted	
421	8.5.7	Evo Energy	No further comment	
422	8.5.7	EQL	Energex and Ergon Energy Network have no comments.	
423	8.5.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
424	8.5.7	Powermetric	No comment	
425	8.5.7	AGL	Noted.	
426	8.5.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
427	8.5.7	Origin Energy	Noted	
428	8.6.7	Evo Energy	No further comment	
429	8.6.7	EQL	Energex and Ergon Energy Network have no comments.	
430	8.6.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
431	8.6.7	Powermetric	No comment	
432	8.6.7	AGL	Noted.	



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433	8.6.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
434	8.6.7	Origin Energy	Noted	
435	8.7.8	Evo Energy	No further comment	
436	8.7.8	EQL	Energex and Ergon Energy Network have no comments.	
437	8.7.8	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
438	8.7.8	Powermetric	No comment	
439	8.7.8	AGL	Noted.	
440	8.7.8	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
441	8.7.8	Origin Energy	Noted	
442	9.1.4	Evo Energy	No further comment	
443	9.1.4	EQL	Energex and Ergon Energy Network have no comments.	
444	9.1.4	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
445	9.1.4	Powermetric	No comment	
446	9.1.4	AGL	Noted.	
447	9.1.4	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
448	9.1.4	Origin Energy	Noted	
449	9.1.7	Evo Energy	No further comment	
450	9.1.7	EQL	Energex and Ergon Energy Network have no comments.	
451	9.1.7	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
452	9.1.7	Powermetric	No comment	
453	9.1.7	AGL	Noted.	
454	9.1.7	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
455	9.1.7	Origin Energy	Noted	
456	10.1.5	Evo Energy	No further comment	
457	10.1.5	EQL	Energex and Ergon Energy Network have no comments.	



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458	10.1.5	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
459	10.1.5	Powermetric	No comment	
460	10.1.5	AGL	Noted.	
461	10.1.5	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
462	10.1.5	Origin Energy	Noted	
463	10.2.5	Evo Energy	No further comment	
464	10.2.5	EQL	Energex and Ergon Energy Network have no comments.	
465	10.2.5	Ausnet	Agreed.	AEMO notes the respondent's support for the change.
466	10.2.5	Powermetric	No comment	
467	10.2.5	AGL	Noted.	
468	10.2.5	Red Lumo	Comments to 2.1.8 apply to this clause.	AEMO notes the respondent's comment and refers to the response in Table 1, item 314
469	10.2.5	Origin Energy	Noted	

Metrology Part B

No.	Section	Consulted Person	Respondent comment	AEMO Response
470	2.2(j)	Evo Energy	There are already too many parties involved and very time consuming to get all agreements. Agreed Method should be reviewed soon after 2022 changes for GS, as it needs streamlining.	AEMO considers this to be out of scope for this consultation, please submit ICF to ERCF for consideration.
471	2.2(j)	EQL	Energex and Ergon Energy Network have no comments.	
472	2.2(j)	AusNet	AusNet Services supports the inclusion of the DRSP role for consultation on re-substitution.	AEMO notes the respondent's support for the change.
473	2.2(j)	Powermetric	No Comment	
474	2.2(j)	CitiPower&Powercor		AEMO notes the respondent's comments.
475	2.2(j)	AGL	Noted. Although the value of this change may be dependent on whether or not interval data with substitutions affects either the baseline or DRSP payment. If the use of substitution only affects the DB and retailer, and not the DRSP, then there seems no reason for the DRSP to need to be a party to the agreement of a substitution.	The DRSP will only be settled when the metering data has a quality flag of "A" or "F". MDPs will now no longer be required to seek agreement from the DRSP for relevant substitution types. The Metrology Procedure Part B will be amended accordingly.
476	2.2(j)	Red Lumo	Red and Lumo do not agree to the DRSP being a responsible party for agreeing and subsequently informing the MDP that a previous substitution was inaccurate and that re-substitution of metering data is required. It is not the role of the DRSP to monitor and challenge or validate the substitutions which are used.	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.
477	2.2(j)	Origin Energy	Origin considers it is unnecessary and can lead to longer lead time for resubstitutions to have a DRSP involved with agreements for interval periods they have no settlement interest in. Therefore, DRSP should be part of an agreement with the FRMP, LR and DNSP for the resubstituting of metering data, only, where the DRSP has financial interest for interval periods applicable to demand response.	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.
478	2.2(n)	Evo Energy	Agree	AEMO notes the respondent's support for the change.
479	2.2(n)	EQL	Energex and Ergon Energy Network have no comments.	
480	2.2(n)	AusNet	Agreed.	AEMO notes the respondent's support for the change.
481	2.2(n)	Powermetric	No Comment	



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482	2.2(n)	AGL	Agree. AGL assumes that this change is a result of Faster Switching, not WDR.	AEMO notes the respondent's support for the change.
483	2.2(n)	Red Lumo	Noted.	
484	2.2(n)	Origin Energy	Noted	
485	3.2(g)	Evo Energy	See comment at 2.2 above	See response to 2.2
486	3.2(g)	EQL	Energex and Ergon Energy Network have no comments.	
487	3.2(g)	AusNet	Agreed.	AEMO notes the respondent's support for the change.
488	3.2(g)	Powermetric	No Comment	
489	3.2(g)	AGL	Agree	AEMO notes the respondent's support for the change.
490	3.2(g)	Endeavour	For consistency with clauses 2.2.j, 3.3.6 and 3.3.8, the above should be 'DRSP and LR' not 'DRSP or LR'. (g) The MDP may perform all Substitution types except type 16 or 18 without the agreement of the affected FRMP, LNSP, DRSP or LR. MDPs may change the quality flag to an existing type 16 or 18 Substitution without seeking further agreement from those parties.	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.
491	3.2(g)	Red Lumo	As per commentary made by Red and Lumo against section 2.2(j), Red and Lumo do not support this change.	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.
492	3.2(g)	Origin Energy	Origin considers it is unnecessary and can lead to longer lead time for substitution agreements to have a DRSP involved in Type 16 /18 methods for interval periods they have no settlement interest in. Therefore, DRSP should be part of an agreement with the FRMP, LR and DNSP for type 16/18 substitutions only, where the DRSP has financial interest for interval periods applicable to demand response.	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.
493	3.2(h)	Evo Energy	Agree	AEMO notes the respondent's support for the change.
494	3.2(h)	EQL	Energex and Ergon Energy Network have no comments.	
495	3.2(h)	AusNet	Agreed.	AEMO notes the respondent's support for the change.
496	3.2(h)	Powermetric	No Comment	
497	3.2(h)	AGL	Agree	AEMO notes the respondent's support for the change.



498	3.2(h)	Endeavour	<p>Grammar error: Replace 'DRSP or LR and the FRMP' with 'DRSP, LR and the FRMP'</p> <p>(h) The MDP must notify the LNSP, DRSP or LR and the FRMP for the <i>connection point</i> of any Substitution within two <i>business days</i> of the Substitution being carried out. Notification is to be achieved via the Participant <i>metering data</i> file as detailed in the Metering Data File Format (MDFF).</p>	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.
499	3.2(h)	Red Lumo	The wording needs to be amended as follows: The MDP must notify the LNSP, DRSP or, LR and the FRMP for the connection point of any substitution within two business days of the Substitution being carried out. Notification is to be achieved via the Participant metering data file as detailed in the Metering Data File Format (MDFF).	
500	3.2(h)	Origin Energy	Noted	
501	3.3.6	Evo Energy	See comment at 2.2 above	See response to 2.2
502	3.3.6	EQL	Energex and Ergon Energy Network have no comments.	
503	3.3.6	AusNet	Agreed.	AEMO notes the respondent's support for the change.
504	3.3.6	Powermetric	No Comment	
505	3.3.6	AGL	Agree	AEMO notes the respondent's support for the change.
506	3.3.6	Red Lumo	As per commentary made by Red and Lumo for section 2.2(j), Red and Lumo do not support this change.	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.
507	3.3.6	Origin Energy	<p>Refer to comment in 3.2 (g).</p> <p>Therefore, DRSP should be part of an agreement with the FRMP, LR and DNSP for the substituting of Type 16, only, where the DRSP has financial interest for interval periods applicable to demand response.</p>	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.
508	3.3.8	Evo Energy	See comment at 2.2 above	See response to 2.2
509	3.3.8	EQL	Energex and Ergon Energy Network have no comments.	
510	3.3.8	AusNet	Agreed.	AEMO notes the respondent's support for the change.
511	3.3.8	Powermetric	No Comment	
512	3.3.8	AGL	Noted	



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513	3.3.8	Red Lumo	As per commentary made by Red and Lumo for section 2.2(j), Red and Lumo do not support this change.	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.
514	3.3.8	Origin Energy	Refer to comment in 3.2(g) Therefore, DRSP should be part of an agreement with the FRMP, LR and DNSP for the substituting of Type 18, only, where the DRSP has financial interest for interval periods applicable to demand response.	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.
515	14.1	Evo Energy	Agree	AEMO notes the respondent's support for the change.
516	14.1	EQL	Energex and Ergon Energy Network have no comments.	
517	14.1	AusNet	Agreed.	AEMO notes the respondent's support for the change.
518	14.1	Powermetric	No Comment	
519	14.1	AGL	Noted	
520	14.1	Red Lumo	Noted.	
521	14.1	Origin Energy	Noted	
522	14.2.1	Evo Energy	Agree	AEMO notes the respondent's support for the change.
523	14.2.1	EQL	Energex and Ergon Energy Network have no comments.	
524	14.2.1	AusNet	Agreed.	AEMO notes the respondent's support for the change.
525	14.2.1	Powermetric	No Comment	
526	14.2.1	AGL	Agree	AEMO notes the respondent's support for the change.
527	14.2.1	Red Lumo	Noted.	
528	14.2.1	Origin Energy	Noted	
529	14.2.2	Evo Energy	Agree	AEMO notes the respondent's support for the change.
530	14.2.2	EQL	Energex and Ergon Energy Network have no comments.	
531	14.2.2	AusNet	Agreed.	AEMO notes the respondent's support for the change.
532	14.2.2	Powermetric	No Comment	
533	14.2.2	AGL	Agree	AEMO notes the respondent's support for the change.
534	14.2.2	Red Lumo	Noted.	
535	14.2.2	Origin Energy	Noted	
536	14.2.2(b)	Evo Energy	Agree	AEMO notes the respondent's support for the change.
537	14.2.2(b)	EQL	Energex and Ergon Energy Network have no comments.	



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538	14.2.2(b)	AusNet	Agreed.	AEMO notes the respondent's support for the change.
539	14.2.2(b)	Powermetric	No Comment	
540	14.2.2(b)	AGL	See issue regarding validated meter reading associated with cl 5.3.7. For non-transfer situations, the impact of an invalid customer reading is substantially lower than for a transfer.	AEMO notes that the type in clause 5.3.7 is a substitution type code rather than a reason code 67 in the MDFF. This section is to utilise the reason code, not the substitution type.
541	14.2.2(b)	Red Lumo	Noted.	
542	14.2.2(b)	Origin Energy	Origin questions the likelihood that a MDP may substitute utilising type 67 (customer Reads) for a MRIM, given customer reads are not usually provided for interval meters.	AEMO notes that the type in clause 5.3.7 is a substitution type code rather than a reason code 67 in the MDFF. This section is to utilise the reason code, not the substitution type.
543	14.3(g)	Evo Energy	Agree	AEMO notes the respondent's support for the change.
544	14.3(g)	EQL	Energex and Ergon Energy Network have no comments.	
545	14.3(g)	AusNet	Agreed.	AEMO notes the respondent's support for the change.
546	14.3(g)	Powermetric	No Comment	
547	14.3(g)	AGL	Agree	AEMO notes the respondent's support for the change.
548	14.3(g)	Red Lumo	Noted.	
549	14.3(g)	Origin Energy	Noted	
550	General Comment	AGL	If criteria are applied to which day/trading intervals are available for WDR settlements, then the agreement of the DRSP role in a number of metrology processes (CI 3.2, 3.3) may not be necessary.	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.
551	CI 5.3.7	AGL	As the use of a Type 67 Customer Reading has been included by AEMO in cl 14.2.1 and 14.3, AGL suggest that a type 67 substitution can only be made where a customer has provided a valid meter reading, as experience has shown that customer readings can be substantially incorrect. Amend cl 5.3.7 to ensure that for customer transfers only a validated meter reading may be used: '... directly based on a validated Meter Reading...'	AEMO has been referring to the reason code, not the substitution type. It is up to the MDP to determine the appropriate substitution type.
552	Document Version	Red Lumo	Effective date should be changed to: 24 October 2021	Agreed - Procedure updated



Glossary and Framework

No.	Section	Consulted Person	Respondent comment	AEMO Response
553	Description	Evo Energy	Agree	AEMO notes the respondent's support for the change.
554	Description	EQL	Energex and Ergon Energy Network have no comments.	
555	Description	Ausnet	It would be beneficial to include a description of what a DRSP.	AEMO notes that this has been accomplished by referring back to the NER.
556	Description	Powermetric	No Comment	
557	Description	AGL	Agree	AEMO notes the respondent's support for the change.
558	Description	Red Lumo	Noted.	
559	Description	Origin Energy	Noted	
560	Glossary	AGL	Typo - Definition – Transaction Type Code – There is a comma at the start of the definition which should be removed.	AEMO notes the respondent's comment, this change has been made.

B2B Guide

No.	Section	Consulted Person	Respondent comment	AEMO Response
561	5.1	Evo Energy	Agree	
562	5.1	EQL	Energex and Ergon Energy Network note that the DRSP has not been listed in section 5 (Table of B2B communications) as a recipient or notified party of One Way Notifications, specifically NOMW, MFIN, PIN.	The IEC notes the respondent's comment, the IEC will be informed as to whether a DRSP would use these notifications once a DNSP requests this usage.
563	5.1	AusNet	Agreed.	The IEC notes the respondents support for the change
564	5.1	Powermetric	No Comment	
565	5.1	AGL	Noted.	



566	5.1	Red Lumo	Red and Lumo do not support the changes to the B2B Guide. As noted above, we welcome any new DRSPs to join the B2BWG, and propose any amendments to the B2B Procedures and/or B2B Guide through the standard consultation processes.	The IEC notes the respondent's comments and refer to this Draft Report, section 4.3.
567	5.1	Origin Energy	Noted	
568	Table 1 - Inclusion of DRSP role as an initiator for PMD Meter Data Process	Evo Energy	No further comment	
569	Table 1 - Inclusion of DRSP role as an initiator for PMD Meter Data Process	EQL	Energex and Ergon Energy Network have no comments.	
570	Table 1 - Inclusion of DRSP role as an initiator for PMD Meter Data Process	AusNet	Agreed.	The IEC notes the respondent's support for the change.
571	Table 1 - Inclusion of DRSP role as an initiator for PMD Meter Data Process	Powermetric	No Comment	
572	Table 1 - Inclusion of DRSP role as an initiator for PMD Meter Data Process	AGL	Noted.	
573	Table 1 - Inclusion of DRSP role as an initiator for PMD Meter Data Process	Red Lumo	Comments to 5.1 apply to this clause.	The IEC notes the respondent's comments and refer to the response in this Draft Report, section 4.3.
574	Table 1 - Inclusion of DRSP role as an initiator for PMD Meter Data Process	Origin Energy	Noted	
575	Table 1 - Inclusion of DRSP role as an	Evo Energy	No further comment	



	initiator for VMD Meter Data Process.			
576	Table 1 - Inclusion of DRSP role as an initiator for VMD Meter Data Process.	EQL	Energex and Ergon Energy Network have no comments.	
577	Table 1 - Inclusion of DRSP role as an initiator for VMD Meter Data Process.	AusNet	Agreed.	The IEC notes the respondent's support for the change.
578	Table 1 - Inclusion of DRSP role as an initiator for VMD Meter Data Process.	Powermetric	No Comment	
579	Table 1 - Inclusion of DRSP role as an initiator for VMD Meter Data Process.	AGL	Noted.	
580	Table 1 - Inclusion of DRSP role as an initiator for VMD Meter Data Process.	Red Lumo	Comments to 5.1 apply to this clause.	The IEC notes the respondent's comments and refer to the response in this Draft Report, section 4.3.
581	Table 1 - Inclusion of DRSP role as an initiator for VMD Meter Data Process.	Origin Energy	Noted	
582	Table 1 - Inclusion of DRSP role as a recipient of Meter Data Notification.	Evo Energy	No further comment	
583	Table 1 - Inclusion of DRSP role as a recipient of Meter Data Notification.	EQL	Energex and Ergon Energy Network have no comments.	
584	Table 1 - Inclusion of DRSP role as a	AusNet	Agreed.	The IEC notes the respondent's support for the change.



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	recipient of Meter Data Notification.			
585	Table 1 - Inclusion of DRSP role as a recipient of Meter Data Notification.	Powermetric	No Comment	
586	Table 1 - Inclusion of DRSP role as a recipient of Meter Data Notification.	AGL	Noted.	
587	Table 1 - Inclusion of DRSP role as a recipient of Meter Data Notification.	Red Lumo	Comments to 5.1 apply to this clause.	The IEC notes the respondent's comments and refer to the response in this Draft Report, section 4.3.
588	Table 1 - Inclusion of DRSP role as a recipient of Meter Data Notification.	Origin Energy	Noted	
589	6.6.1(a)	Evo Energy	No further comment	
590	6.6.1(a)	EQL	Energex and Ergon Energy Network have no comments.	
591	6.6.1(a)	AusNet	Agreed.	The IEC notes the respondent's support for the change.
592	6.6.1(a)	Powermetric	No Comment	
593	6.6.1(a)	AGL	Noted.	
594	6.6.1(a)	Red Lumo	Comments to 5.1 apply to this clause.	The IEC notes the respondent's comments and refer to the response in this Draft Report, section 4.3.
595	6.6.1(a)	Origin Energy	Noted	
596	6.6.2(a)	Evo Energy	No further comment	
597	6.6.2(a)	EQL	Energex and Ergon Energy Network have no comments.	
598	6.6.2(a)	AusNet	Agreed.	The IEC notes the respondent's support for the change.
599	6.6.2(a)	Powermetric	No Comment	
600	6.6.2(a)	AGL	Noted.	



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601	6.6.2(a)	Red Lumo	Comments to 5.1 apply to this clause.	The IEC notes the respondent's comments and refer to the response in this Draft Report, section 4.3.
602	6.6.2(a)	Origin Energy	Noted	

B2B Hub

No.	Section	Consulted Person	Respondent comment	AEMO Response
603	2.2.1	EVO Energy	No further comment	
604	2.2.1	EQL	Energex and Ergon Energy Network have no comments.	
605	2.2.1	AusNet	Agreed.	AEMO notes the respondents support for the change
606	2.2.1	Powermetric	No Comment	
607	2.2.1	AGL	Noted.	
608	2.2.1	Red Lumo	Red and Lumo do not support this change. The change in the wording as proposed by AEMO does not align to the National Electricity Rules. Furthermore, should AEMO proceed with the change as documented, this will in effect, exclude DRSPs from becoming a IEC member. We refer AEMO to review NER rule 7.17.6 and the definition of Third Party B2B Participants.	AEMO notes the respondent's comments and updates have been made to section 2.2 and 2.2.1.
609	2.2.1	Origin Energy	Noted	
610	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>ProvideMeterDataRequest</u>	EVO Energy	No further comment	
611	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>ProvideMeterDataRequest</u>	EQL	Energex and Ergon Energy Network have no comments.	
612	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>ProvideMeterDataRequest</u>	AusNet	Agreed.	AEMO notes the respondent's support for the change.



613	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>ProvideMeterDataRequest</u>	Powermetric	No Comment	
614	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>ProvideMeterDataRequest</u>	AGL	<p>Comma needed after ‘...Appendix A and,’ and after ‘..Appendix C’.</p> <p>Upon completion and submission of the application forms referred to in Appendix A and, for Third Party B2B Participants the completion of the checklist and associated documentation in Appendix C, to AEMO’s satisfaction, AEMO will grant an applicant access to pre-production for the purposes of assessing an applicant’s ability to fulfil messaging requirements.</p> <p>However, consideration should be given to re-writing the clause to improve clarity; eg:</p> <p>In order for AEMO to grant access to pre-production environments for the purposes of assessing an applicant’s ability to fulfil messaging requirements, the following must be completed to AEMO’s satisfaction:</p> <p>(i) B2B Participants must complete and submit the application forms in Appendix A; and</p> <p>(ii) Third Party B2B Participants must complete the checklist and associated documentation in Appendix C.</p>	AEMO notes the respondent’s comment. AEMO has redrafted the clause.
615	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>ProvideMeterDataRequest</u>	Red Lumo	Noted	
616	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>ProvideMeterDataRequest</u>	Origin Energy	Noted	
617	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>ProvideMeterDataResponse</u>	EVO Energy	No further comment	



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618	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>ProvideMeterDataResponse</u>	EQL	Energex and Ergon Energy Network have no comments.	
619	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>ProvideMeterDataResponse</u>	AusNet	Agreed.	AEMO notes the respondent's support for the change.
620	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>ProvideMeterDataResponse</u>	Powermetric	No Comment	
621	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>ProvideMeterDataResponse</u>	AGL	Noted	
622	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>ProvideMeterDataResponse</u>	Red Lumo	Noted	
623	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>ProvideMeterDataResponse</u>	Origin Energy	Noted	
624	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>VerifyMeterDataRequest</u> .	EVO Energy	No further comment	
625	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>VerifyMeterDataRequest</u> .	EQL	Energex and Ergon Energy Network have no comments.	
626	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>VerifyMeterDataRequest</u> .	AusNet	Agreed.	AEMO notes the respondent's support for the change.
627	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>VerifyMeterDataRequest</u> .	Powermetric	No Comment	
628	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>VerifyMeterDataRequest</u> .	AGL	Noted	
629	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>VerifyMeterDataRequest</u> .	Red Lumo	Red and Lumo do not support this change. This is in line with commentary made by Red and Lumo for section 2.2(j) of the Metrology Procedure Part B.	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.



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630	Appendix B, table 1 - Inclusion of DRSP role as an initiator for <u>VerifyMeterDataRequest</u> .	Origin Energy	Noted	
631	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>VerifyMeterDataResponse</u> .	EVO Energy	No further comment	
632	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>VerifyMeterDataResponse</u> .	EQL	Energex and Ergon Energy Network have no comments.	
633	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>VerifyMeterDataResponse</u> .	AusNet	Agreed.	AEMO notes the respondent's support for the change.
634	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>VerifyMeterDataResponse</u> .	Powermetric	No Comment	
635	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>VerifyMeterDataResponse</u> .	AGL	Noted	
636	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>VerifyMeterDataResponse</u> .	Red Lumo	Red and Lumo do not support this change. This is in line with commentary made by Red and Lumo for section 2.2(j) of the Metrology Procedure Part B.	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.
637	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>VerifyMeterDataResponse</u> .	Origin Energy	Noted	
638	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>MeterDataNotification</u> .	EVO Energy	No further comment	
639	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>MeterDataNotification</u> .	EQL	Energex and Ergon Energy Network have no comments.	
640	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>MeterDataNotification</u> .	AusNet	Agreed.	AEMO notes the respondent's support for the change.
641	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>MeterDataNotification</u> .	Powermetric	No Comment	



642	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>MeterDataNotification</u> .	AGL	Noted	
643	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>MeterDataNotification</u> .	Red Lumo	Noted	
644	Appendix B, table 1 - Inclusion of DRSP role as a recipient of <u>MeterDataNotification</u> .	Origin Energy	Noted	
645	Appendix A	Endeavour	Check network options – Is it only a Telstra BDSL only, or are there NBN options now available ?	AEMO notes the respondent's comment and notes that this is outside the scope of B2B and B2M services.
646	Appendix B, table 1 - SO – Metering Service Works.	AGL	AGL notes the B2B SOs nominated but seeks clarity on how a DRSP might manage the installation or reconfiguration of enhanced metering for an aggregated contracted site as there may be differences of opinion as to whether the customer can change the metering (eg request a meter upgrade or reconfiguration).	AEMO notes the respondent's comment, AEMO is not aware of this being an issue for DRSPs. AEMO anticipates that the DRSP's request for change will occur through the normal contractual process between MC, customer, and service providers.
647	Appendix B, table 1 - OWN – Planned Interruption Notice	AGL	AGL also notes that a DRSP is not considered a recipient of a OneWayNotification for planned Interruptions, and would suggest that this function is relevant to a DRSPs ability to manage their customer load bidding if the PIN is to be used.	AEMO notes that in response to the general question: "Do you agree that a PIN is the best mechanism for advising the DRSP? Does it need to be modified? Is there a better alternative? " AGL noted that "Given that some DRSPs may choose not to become B2B enabled, AGL is prepared to make a change that is industry wide, but AGL does not believe that it should be required to additional, manual or bespoke features to meet the information needs of various DRSPs."



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648	Appendix B, table 1 - OWN – Notified Party	AGL	Should a DRSP have notice of a Disconnection / Reconnection Service Order ?	AEMO notes that customers of DRSP's will likely be more sophisticated in their energy management and will be advised of disconnection/reconnection service order from distributors or retailers and should in turn inform there DRSP of the no supply/resupply.
649	Appendix B, table 1 - OWN – Meter Faulty	AGL	Should a DRSP have notice of a meter fault, as this will impact their ability to use that customer for a DRSP bid ? Should the DRSP be a recipient of the AEMO Meter Exemption where they are a registered Participant as this would be expected to meas that that site needed to be paused from their portfolio until the site metering was rectified.	AEMO notes that customers of DRSP's will likely be more sophisticated in their energy management and will be advised of a meter fault.
650	Additional Comment for Appendix B Table 1	Origin Energy	As this procedure is currently under consultation, Origin Energy requests that the Life Support Notification and Request is included in the list of B2B Test Transactions. This is due to the importance of both these transactions in the market.	

Additional Comments

No.	Section	Respondent comment	AEMO Response
651	General	AGL notes that various meter data quality criteria have been established for Faster Switching. As such, AGL seeks clarity on the meter data quality criteria which would be applied to the WDR process. For instance, would there be trading periods or days, where a WDR load cannot be considered for settlement purposes due to poor quality metering data, and what criteria would be applied to the data to include or exclude a day from a WDR settlement ?. For example, if meter data is substituted, then how many TIs can be substituted (and surrounding TI periods for an event) should be excluded from WDR settlements.	AEMO notes the respondent's comment and refers to the response in Table 1, item 475.