

MSR List of Submissions - LMRP

No.	Question Number	Question	Participant	Participant Comments
1	1	What is your preferred format (e.g. YYYY or Q#-YYYY or DD- MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	AGL	AGL's preferred format is YYYY, but specifically wants to flag that this field should be structured as a DATE format field. The expectation is that the information provided as YYYY (e.g. 2025) would relate to a financial year, most likely the period the meter is due to be replaced (e.g. a meter in the 2025/2026 year would be represented as 2026). AGL notes that the usage of this field needs to be consistent. AGL is also aware that some Networks are interested in providing a greater level of granularity, and AGL believes that using the date format will allow for that granularity.
2	1	YYYY or DD- MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Alinta Energy	The preference would be YYYY, subject to confirmation of this is calendar year and any data loaded in a partial calendar year as a result of go-live date, provides data for the following year. For example, a go-live 01-JUL-2025 would not have any dates as 2025, only 2026.
3	1	YYYY or DD- MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Ausgrid	Ausgrid's strong preference is either of these Q#-YYYY or DD- MMM-YYYY. Ausgrid strongly urges AEMO to allow participants flexibility in the population of the LMRP field. This is critical for the successful scheduling of multi occupancy one in all in works and overall meter reading route efficiency. Ausgrid is currently negotiating with a number of participants around identification of flexible LMRP dates within each LMRP year. Once a format is decided a standard arrangement must be agreed between all LNSPs. Is it the start or the finish of the LMRP year (i.e. 01072025 or 30062026). Ausgrid does not support YYYY.
4	1	What is your preferred format (e.g. YYYY or Q#-YYYY or DD- MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Bluecurrent	YYYY. In regards to including a quarterly indicator - It is unlikely that a Metering provider will be able to construct a program that will meet the quarter requirement because resource availability will vary between metering providers and this will be the primary driver for the timing of meter exchanges over the year, and other factors. Also the rule does not support DNSP's directing a retailer to perform a meter exchange in a specific quarter therefore specify a quarter is unnecessary.

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5	1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors
6	1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Energy Australia	DD-MMM-YYYY
7	1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Energy Queensland	Energy Queensland's preferred format is YYYY. It is our view that this is the simplest format and could most easily be incorporated into administrative processes.
8	1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Evoenergy	<p>Why have YYYY? Just have 1, 2, 3, 4, 5 to closer reflect the 'Interim period' in the determination.</p> <p>If the proposed date agreed is YYYY, must stipulate that this means financial year start.</p> <p>If the proposed date agreed is Q#-YYYY, must stipulate that this means calendar year Q1 etc. Not preferred.</p> <p>If the proposed date agreed is DD-MMM-YYYY, must stipulate that this defines the period the MC can schedule works from date, and must be first day of that month. Otherwise risk of getting too many variations.</p> <p>Preferred option: DD-MMM-YYYY or 1,2,3,4,5. Either way, needs qualifying statements.</p>
9	1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	INTEGP	Preferred format: Q#-YYYY
10	1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Intelliub	<p>We prefer the format of Q#-YYYY as this will allow the DNSP to suggest which NMI to work on for each quarter (noting that this is a suggestion only).</p> <p>We also support the format of YYYY as this is the minimum information required from the DNSP.</p> <p>We do not support DD-MMM-YYYY because this may be setting expectations that a meter exchange is to occur on a particular date, or a date period that is shorter than a quarterly period, which we are unlikely be able to comply with.</p>
11	1	What is your preferred format (e.g. YYYY or Q#-YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Origin Energy	Origin supports the format of DD-MMM-YYYY with a clear definition that the date is the 'LMRP due date' as per LMRP schedule. For avoidance of doubt, field name should be self-explanatory, i.e., LMRP due date

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12	1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	PlusES	<p>PLUS ES' preference is that a formatting consistency exists across B2M and B2B fields. Generally, formatting of 'date' fields is dd/mm/yyyy and subsequently participants may have aligned their own system 'date' formatting to the standard. Consequently, PLUS ES's preference is dd/mm/yyyy.</p> <p>Additionally, the LMRP field value should have a standard definition. We recommend 'Legacy meter replacement must be completed by this date'. For example, if the LNSP schedules a NMI for the FY1 of the LMRP year, assuming the LMRP commences 1 Jul 25, then the LMRP field value should be 30/06/2026.</p>
13	1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	Red & Lumo	Red Energy and Lumo Energy (Red and Lumo) prefer the date format DD-MMM-YYYY, with the DD-MMM indicating the last day of the quarter/financial year. e.g. 30-JUN-2027
14	1	What is your preferred format (e.g. YYYY or Q#-YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	SAPN	SAPN sees YYYY would be the preferred format, while at the same time is also open to the DD-MMM-YYYY format if there is enough support and justification. However, we do not support the Q#-YYYY option.
15	1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	TasNetworks	<p>The draft rule includes a definition of Interim Period (being each financial year within the LMRP Period). Accordingly, TasNetworks believes the format of the field for the LMRP only needs to indicate the interim period by way of a single digit (e.g. 1, 2, 3 etc.). Having a value of YYYY may cause confusion and require two-year groups to be aggregated for reporting against an interim period. If a day and month is included, it is not clear whether it is intended to signify the start of an interim period or the end of the period.</p> <p>TasNetworks understands that some DNSPs have a preference to be able to define interim periods in a more granular form of quarterly periods. TasNetworks is also accepting of this approach, but this approach would need to also allow for a quarterly period not being specified (e.g. set the Q value to 0).</p> <p>TasNetworks has no preferred format and can cater for whatever is introduced for setting this value in MSATS via the BUT, as long as there is flexibility to assign NMIs to an individual yearly interim period.</p>
16	1	YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors
1	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	AGL	Both tools are suitable, however AGL recommends the use of the BUT in the first instance to avoid a high volume of market transactions. However, if an LMRP year post the initial value being set is changed, the LNSP should be required to notify appropriate participants. If a small number of updates were required, CRs would be appropriate.

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2	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Alinta Energy	Alinta's preference is for CRs to be processed (with agreed volumes & timing) to ensure that internal systems are updated upon receipt of the transaction from market.
3	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Ausgrid	Ausgrid supports the use of the BUT for initial load and CRs for any updates.
4	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Bluecurrent	We support Bulk Update Tool as the primary method of updating MSATS. We don't think that capability to update the LMRP year via CR's is required if DNSP's load the LMRP indicator via the BUT tool at the start of the program. It's a one-off task.
5	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors
6	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Energy Australia	Yes
7	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Energy Queensland	Energy Queensland is of the view that the use of the Blind Update Tool (BUT) is adequate to update the Legacy Meter Retirement Plan (LMRP) field.
8	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Evoenergy	Yes
9	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	INTEGP	Yes, the proposed tools are adequate to update the LMRP field.
10	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Intelliub	We support using the BUT to update the LMRP field in MSATS but do not support CRs for updating this field because it creates a risk that changes via CR can be done outside of the AER approval process which means that our plans may be impacted with short notice. We understand that any changes to an approved LMRP can only be done if there is a material error or material change event, which suggest that the change must be for a large volume of NMIs therefore using the BUT would be most appropriate.
11	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Origin Energy	Origin supports the use of BUT tool for initial LMRP data population in MSATS, followed by CRs for any subsequent change in that field to ensure the CATS history model is maintained.
12	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	PlusES	The proposed tools BUT and CRs is adequate to update the LMRP field. PLUS ES proposes that the utilisation of the BUT is limited to the initial population of the LMRP field. Post go live if any LMRP values need to be changed, PLUS ES recommends that a CR is used so that all associated participants receive the notification and update their systems accordingly. The BUT does not provide notifications and a participant

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				who has downloaded the LMRP value prior to any change will be unaware of any changes.
13	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	Red & Lumo	Red & Lumo agree that the BUT for initial load and CR for any updates are appropriate methods for populating the LMRP field.
14	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	SAPN	SAPN sees the proposed tools are adequate.
15	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	TasNetworks	TasNetworks supports the use of the BUT for populating the LMRP field in MSATS. TasNetworks does not believe there is a case for CRs to be developed for this purpose. If the LMRP field needs to be updated then it is likely that this would need to be done for groups of NMI's not on an individual basis, and therefore the BUT should be configured to facilitate this in all cases
16	2	Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors
1	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	AGL.	AGL recommends AEMO coordination, particularly if the BUT is used given the volume limits in place. This will also allow for a clear schedule for LNSP's to avoid any crossover.
2	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Alinta Energy	No preference recorded.
3	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Ausgrid	AEMO should consult with industry and allow for LNSP to schedule updates using the BUT.
4	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Bluecurrent	No comment – not impacted.
5	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors
6	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	EA	Yes
7	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Energy Queensland	Energy Queensland is of the view that AEMO coordination is required for DNSPs to load LMRP into Market Settlement and Transfer Solutions (MSATS) from May 2025 to 29 June 2025 to ensure identified update limits are effectively applied and managed (for example, where a MSATS limit of 400k National Metering Identifiers (NMI's) per day is applied).
8	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Evoenergy	Preferred. Do not want to slow or impede MSATS operability and speed. Keep it simple.

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9	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	INTEGP	No, AEMO coordination is not required for us to load LMRP into MSATS from May 2025 to 29 June 2025.
10	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Intelliub	Yes, we believe AEMO should help to coordinate the updating of the LMRP field in MSATS to manage the large volume of updates so it is done in the shortest time without impacting on system performances.
11	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Origin Energy	Yes, Origin supports AEMO's coordination in managing LMRP data population in MSATS, similar to the MSDR project as it worked seamlessly across all participants.
12	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	PlusES	To minimise participant impact it would be beneficial for AEMO to provide high-level coordination regarding the upload of the LMRP fields. Furthermore, the NMIs for the first LMRP target year should be updated by LNSPs ASAP and all LMRP NMIs should be updated before the commencement of the Acceleration Smart Meter Deployment.
13	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	Red & Lumo	Red and Lumo leave this to DNSP to respond to.
14	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	SAPN	SAPN sees minimal support and coordination will be required from AEMO to ensure there should be no surprise in both the volume and schedule for performing the update.
15	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	TasNetworks	It would be preferable for AEMO to coordinate an allotted schedule for each DNSP to utilise the BUT for the initial population, to alleviate congestion and transaction volumes for those participants utilising C1 report replication.
16	3	Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors
1	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	AGL.	Standing Data quality reports will prove useful; however, we believe that providing more detail on what should be included in these reports would need to be determined once the rule change has been finalised, and all parties are clear on what their obligations are. Some possible standing reports could cover: <ul style="list-style-type: none"> • NMIs due in a financial year • NMIs with Defects • NMIs with only the initial MC/MP • NMIs without defects where the LMRP has been passed • NMIs with First Notice issued

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				<ul style="list-style-type: none"> NMIs where customer has advised rectification / remediation
2	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Alinta Energy	No preference recorded.
3	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Ausgrid	AEMO should provide reports to LNSPs where a Type 5/6 NMI does not have an appropriate LMRP date populated.
4	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Bluecurrent	No comment – not impacted.
5	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors
6	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	EA	The report required needs to contain the NMI; LMRP date; Defect type; site remediation status;
7	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Energy Queensland	<p>Energy Queensland is of the view that no specific standing data quality reports (SDQR) are required to be created for participants to meet their procedural obligations for LMRP. However, if SDQR were to be required, we see value in it being made available for all participants and to incorporate components such as:</p> <ul style="list-style-type: none"> completion reporting against LMRP year targets; and defect management reporting, including notice dates and type of notification.
8	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Evoenergy	<p>Generally No, as participants understand their obligations and already report to AER.</p> <p>May want a report on 1 July 2025 where no LMRP entered.</p>
9	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	INTEGP	<p>Yes, a report would ensure that obligations are met.</p> <p>The components of the report are to include:</p> <ul style="list-style-type: none"> NMI
10	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Intelliub	Yes, reports should be created to identify NMIs with a type 5/6 meter without the LMRP field populated

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11	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Origin Energy	<p>Origin recommends new SQ reports to be developed and sent to the current FRMPs every week as an RM-xx individual results and summary report.</p> <ul style="list-style-type: none"> The key components of this RM report should be based on the new standing data fields that are being created as a consequence of ASMD rule change, including (not limited to) NMIs in current LMRP year for a particular FRMP, NMIs that are overdue NMIs with defect flag, and NMIs with different Site Remediation Statuses and Dates. Second RM report should provide any missing values in Site Remediation Status and Dates where defect has been flagged. Origin suggests another report be created and issued to the new/current FRMPs end of each month with NMIs that have LMRP year as the 'current year' where a FRMP has changed due to an in-situ or move-in transfer.
12	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	PlusES	<p>For a large deployment program such as LMRP, PLUS ES supports that standing data quality reports would deliver benefits. Some SDQ proposals:</p> <ul style="list-style-type: none"> NMIs with Basic/MRIM and no assigned LMRP value to the LNSP No Contestable MC assigned to a LMRP NMI within 3 months of the LMRP date - sent to the FRMP. LMRP NMI where the LMRP date has lapsed, and a legacy meter exists. i.e. No COMMSX meter installed. This report could also include if a defect has been identified against the NMI. To the FRMP & MC.
13	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	Red & Lumo	Red and Lumo do not require ongoing standing data reports to identify LMRP in standing data.
14	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	SAPN	SAPN sees there would be value to run the snapshot report only for the type 5&6 NMIs. This will help ensuring all the NMIs require to be included in the LMRP and the BUT process are correctly captured.
15	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	TasNetworks	From a DNSP perspective it may be preferable that AEMO verify that 100 per cent of NMIs with legacy meters have been populated with an LMRP value in MSATS. This could be a once-off report for the initial load and then considered as an ongoing SDQ report if deemed necessary.
16	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors
1	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	AGL.	Currently, no.

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2	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Alinta Energy	The transparent and consistent engagement of FRMP with DNSP will be critical to success.
3	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Ausgrid	Why are greenfield sites included in LMRP assessment? A NMI should not be in MSATS without a meter installed. LMRP date should not be nulled after the legacy meter is replaced for reporting purposes. Individual CSV files will not be provided once the LMRP date has been populated in MSATS.
4	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Bluecurrent	No comment.
5	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors
6	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	EA	Unlike VIC, this smart meter rollout is landed on the retailer, from communication, appointments, customer service, issues management, complaint management and potential bad debt where customers can't pay accounts or for site upgrades. There is not a standard approach to either customer communication or financial support for customers to upgrade sites. We will be impacted by all of this as well as the 'One in All in' proposed solution. The responsibility should be shared between the DB's and the retailers especially on the Shared fuse process. We dismissed looking at the most efficient way to manage these replacements – there is no standard or requirement for anyone other than the retailer to manage this.
7	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Energy Queensland	Energy Queensland does not have any feedback on this consultation question.
8	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Evoenergy	LMRP MSATS field. YYYY is not preferred. Just have 1, 2, 3, 4, 5 to closer reflect the interim period in the determination, or DD-MMM-YYYY with qualifying statement.
9	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Intelliub	We note AEMO is proposing a release date that tries to balance the maximum time allowed for industry to design, build and test their solution and the time required for updating the LMRP field in MSATS. We agree with this approach and suggest AEMO share with industry how they determined the optimal release date (we believe with the information available in MSATS AEMO has all the required information to make this determination). It is our understanding that the LMRP updates can be done within 10 business days, however it would be good to get AEMO's confirmation.

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10	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Origin Energy	No further comments
11	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	PlusES	PLUS ES do not support communication of LMRP dates or updates of specific NMIs via CSV files. The CSV file is out of date the minute it is sent.
12	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	Red & Lumo	Red and Lumo reserve the right to offer alternative suggestions once the Final Determination is made.
13	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	SAPN	No comment.
14	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	TasNetworks	No comment.
15	5	Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors

MSR List of Submissions - Defects

No.	Question Number	Question	Participant	Participant Comments
1	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	AGL.	<p>AGL prefers the defect type to be included in MSATS rather than just a flag, to identify customer side defects. However, noting the current position of AEMO and no clarity from the AEMC, AGL supports a flag.</p> <p>Note:</p> <p>AGL has also provided feedback in Question 5 which also outlines that ownership of the Defect Flag should be the responsibility of the MP/MC as they have the most information on the defect on a site and should retain management of that Flag to ensure it is maintained with respect to the status of the site and only updated when the meter is replaced.</p>
2	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Alinta Energy	<p>Yes. Alinta would like to see this as a B2B transaction and recommend AEMO consider the inclusion of an effective date field to ensure that participants are aware of the date the defect flag is activated and removed / cleared.</p>
3	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Ausgrid	<p>Yes.</p> <p>LNSP must have visibility of this flag (pending the outcome of the final rule). Allowing the LNSP visibility of the defect flag allows the LNSP to make an assessment of whether the site has been visited by an MP and a defect exists. This in turn allows the LNSP to make an assessment on meter reading route scheduling and when to convert walking routes to an alternate strategy.</p> <p>Allowing LNSP defect visibility, would also assist in minimising wasted LNSP scoping visits. If a retailer raises a TIGS scoping SO on a NMI where a defect already exists for another NMI associated with the scoping, which the retailer who is raising the new TIGS scoping SO has no visibility of, the LNSP could close off the SO as defect exists to that retailers scoping SO request.</p> <p>As it is proposed that the defect flag should remain in use after the acceleration period, Ausgrid suggest that the defect flag should be able to be used on non legacy meter NMIs.</p>
4	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Bluecurrent	<p>We believe the defect flag should represent the nature-of-defect rather than a yes/no flag as is proposed. This provides the most efficient mechanism to provide this information to a retailer to allow them to meet their notification obligations. The nature-of-defect codes that are required to be included are specified in the B2B V3.9 consultation.</p>
5	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	CitiPower Powercor	<p>CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors</p>

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6	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	EA	EA Support this
7	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Energy Queensland	Energy Queensland agrees with the proposed defect flag. However, while we agree with the proposal, we are of the view that there would be greater value to all participants if the flag also identified the defect type. This could be done by having an enumerated value for the indicator as opposed to a simple yes/null indicator. This would allow the presence of a defect and the defect type to be captured in a single field where the enumerated value would identify pre-agreed defect types.
8	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Evoenergy	Yes
9	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	INTEGP	Yes, we agree with the proposed Defect flag allowing an MC to record a defect in MSATS.
10	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Intelliub	<p>We prefer for the nature of defect to be allowed in MSATS, as opposed to only a flag indicating the presence of a defect. This will allow retailers, and any subsequent retailers who wins the NMI, to have appropriate information to allow them to communicate to customers the nature of the defect.</p> <p>We note:</p> <ul style="list-style-type: none"> a) the draft rule allows AEMO to ‘... specify the information that must be recorded by a Metering Coordinator where it identifies a site defect during a site visit to replace a Legacy Meter’ b) AEMO has expressed concerns about the ‘...need to adhere to Protected Information management requirements under the NEL and ensure the NER provides a clear and transparent operational framework’ c) AEMO states ‘AEMO does not consider "defect" information to fall under NMI Standing Data or Metering Data as currently defined. Amending either definition to include "defect" information would be impractical and likely result in unintended consequences. By nature, "defect" information is temporal and pertains to the customer’s electrical installation, actions, or premises. AEMO believes that "defect" information should not be stored in MSATS, and interested parties should consider developing B2B transactions for this information’ <p>However:</p> <ul style="list-style-type: none"> a) currently MSATS has a field called ‘hazard’ and is defined as ‘Free text or code identifying hazards associated with reading, maintaining or installing the meter. If the following are present at the metering installation, they should be listed in this field: Asbestos’

No.	Question Number	Question	Participant	Participant Comments
				<p>b) One of the allowable values we wish to define for defect is 'Asbestos'</p> <p>c) We believe the information we want to populate for defects is similar to hazards and given the field called 'hazard' already exists we believe there will be no additional risk for AEMO in complying with their Protected Information obligations</p> <p>Therefore, we would be pleased to work with AEMO to define a new field for defects with a definition to limit this field to information related to technical scenarios that prevents the installation of a meter, does not include any information related to the customer and any other information AEMO wishes to exclude.</p>
11	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Origin Energy	<p>Origin supports the defect flag to be updated and maintained by the current MC in MSATS.</p> <p>While Origin understands that AEMO has removed the 'Defect Type' from this issues paper, Origin strongly supports the defect 'information' to be also stored in MSATS for operational efficiencies. This may be subject to the clarification provided in the AEMC's final rule; however the site defect information can be stored in MSATS in a way that does not overlap with any customer specific information. For e.g. 'obstruction' may be customer specific, however 'asbestos board' is site specific that may have no correlation with customer data.</p>
12	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	PlusES	<p>PLUS ES' preference is for the Defect Type to be in MSATS instead of a flag. The subsequent process of trying to obtain the defect type via B2B mechanism is restrictive, and does not cater for scenarios where the MC is no longer the MC at the NMI.</p> <p>We also acknowledge AEMO's concerns regarding potential Privacy Act implications, however, a combination of B2M and B2B transactions to communicate the Defect Type compared to one field in MSATS, requires participants to incur unnecessary operational costs which does not provide them the transparency of the MSATS alternative.</p>
13	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	Red & Lumo	<p>Yes, an MC should be able to update defect fields in MSATS using a CR50XX. The nature of the defect, the original MC and the date the defect was identified should be recorded.</p>
14	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	SAPN	<p>SAPN sees allowing the MC to record the Nature-of-defect information in MSATS instead of only the Defect flag can avoid having the need to have separate B2B transactions for exchange of the information. This can help streamline the process and better data consistency as comparing to the approach of allowing MC to record a defect with only the Defect flag in MSATS and then need to have a separate B2B transactions for the exchange the Nature-of-defect information.</p>

No.	Question Number	Question	Participant	Participant Comments
15	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	TasNetworks	TasNetworks believes this approach aligns with the requirements of the draft rule, noting that this is only for the contestable MC to populate this, not the DNSP as a site's Initial MC.
16	1	Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors
1	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	AGL.	<p>AGL has provided feedback to the AEMC that the defect notice process should be reset on change of retailer/customer, as we believe notices sent by different retailers to customers, with them potentially only receiving one notice or no notices, may not have the same impact or benefit as receiving both notices.</p> <p>Should this feedback be adopted into the final rule change, we believe the Site Remediation Status Date field would not be needed as each retailer would trigger notices on receiving a defect transaction and track the notices they have issued, as is done with other customer communications.</p> <p>However, should the rule change remain the same we believe these inclusions will be sufficient as we note AEMO can only operate within the outline of the rules.</p>
2	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Alinta Energy	No. Given the high likelihood of changes to customers associated with the standing data, along with changes to FRMP due to insitu movements, this is will overly complicate the solution & retailer obligations. In addition, this data is not fit for purpose to standing data.
3	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Ausgrid	Yes.
4	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Bluecurrent	No. We propose that there should be two date fields added to MSATs that track the first and second defect notices. It is not necessary to have a Site Remediation Status. The defect flag (or Nature-of-defect) will indicate that a defect is present (or not). After retailers have sent the first and second notices (required to be tracked by the rules) and followed up the customer within the regulated time frames. The presence of the flag within the defect notification periods and beyond will indicate the reason why a meter exchange has not proceeded as required by the LMRP schedule. This is a much simpler approach to managing this information.
5	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors

No.	Question Number	Question	Participant	Participant Comments
6	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	EA	EA Support this
7	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Energy Queensland	Energy Queensland broadly agrees with the proposed approach.
8	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Evoenergy	It will do
9	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	INTEGP	Yes, we agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects.
10	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Origin Energy	Agree, however in addition to these two fields, we also suggest 'Defect Type' to be included in MSATS.
11	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	PlusES	The Site remediation status field will inform/guide 'new' roles about the status, especially in instances of FRMP churn. For full benefit realisation, there is a dependency on customers notifying/advising their retailer of site remediations and for all retailers to consistently update the field.
12	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	Red & Lumo	No, these fields communicating retailer notifications to a customer do not belong in MSATS. As long as the date the defect was identified is recorded in MSATS by the MC, then any retailer can initiate or continue the notification process by identifying the business days after the site defect was first recorded in MSATS.
13	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	SAPN	No comment.
14	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	TasNetworks	TasNetworks considers that the approach taken in relation to tracking the remediation of site defects should align with the preferences of retailers, in accordance with the rule's intent.
15	2	Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors

No.	Question Number	Question	Participant	Participant Comments
1	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	AGL.	<p>In line with our position of changes to the proposed rule change in question 2), we believe 'FirstNotice' & 'SecondNotice' should be removed, and retailers can track these notices in their individual systems – again, recognising AEMO can only operate within the rules.</p> <p>However, should the rule change remain unchanged in its current notification requirements we believe the proposed enumerations are largely acceptable.</p> <p>Independent of modifications to the rule, we do recommend amending the value of 'RemediationSuccessful' to 'RemediationAdvised'. We believe this is more in line with the definition, where it refers to the customer advising that the defect has been rectified, however does not guarantee the success of the rectification. In line with our previous comment, no change should be made to the Defect Status until the MP has exchanged the meter.</p> <p>Further, AGL notes that the enumerations listed in both the B2B and B2M processes should be consistent – e.g. either both 'RemediationAdvised' or 'RectificationAdvised'.</p>
2	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Alinta Energy	Partial. The process itself is agreeable bar the response provided above in question 2. It will also require some additional clarity to ensure that when FRMP role changes during the process, it is clear what the role & responsibilities are / where they pick up, as a result of the change in participants.
3	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Ausgrid	Yes.
4	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Bluecurrent	No. This field is not necessary.
5	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors
6	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	EA	EA Support this.
7	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Energy Queensland	Energy Queensland broadly agrees with the proposed enumerations.
8	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Evoenergy	Yes
9	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	INTEGP	Yes, we agree with the proposed enumerations which indicate the steps in the Site Remediation Staus process.

No.	Question Number	Question	Participant	Participant Comments
10	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Origin Energy	Origin agrees with the allowed values, however for avoidance of doubt, Origin suggests that since 'RemediationSuccessful' is based on customer advise and may not be the true reflection of remediation status unless MP revisits and confirms. Origin suggests a clear definition of this value and updating the name to 'RemediationConfirmed.'
11	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	PlusES	PLUS ES proposes the following editorial changes: <ul style="list-style-type: none"> RemediationSuccessful – could be misleading when communicating that a customer has advised the defect has been remediated. It does not necessarily mean it is 'successful'. Suggest a more general term of 'Remediation Advised'. RemediationUnsuccessful – similarly this also could be misleading. This information needs to communicate that the customer has not remediated the defect or the retailer has been unable to confirm with the customer. Suggest a more general term of Unremediated.
12	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	Red & Lumo	No, please see response to question 2. Red and Lumo suggest that a standing data field indicating the date the defect was identified removes the requirement for a new CR to be created for retailer notifications and thus reduces the total number of enumerations as well.
13	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	SAPN	No comment.
14	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	TasNetworks	TasNetworks does not have a position on the enumeration of steps in the site remediation process and considers that AEMO should be guided in this regard by the preferences of retailers, in accordance with the rule's intent.
15	3	Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors
1	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	AGL.	Standing Data quality reports will prove useful; however, we believe that providing detail on what should be included in these reports would need to be determined once the rule change has been finalised.
2	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Alinta Energy	No preference recorded.
3	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Ausgrid	Ausgrid does not require reports for defect, just visibility of them in MSATS NMI standing data.

No.	Question Number	Question	Participant	Participant Comments
4	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Bluecurrent	It is unclear why these reports would be necessary and for whom? The retailer or the MC.
5	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors
6	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	EA	The report required needs to contain the NMI; LMRP date; Defect type; site remediation status;
7	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Energy Queensland	Energy Queensland is of the view that no specific SDQR are required to be created for participants to meet their procedural obligations for defects. However, as stated above, if SDQR were to be required, we see value in it being made available for all participants and to incorporate the components suggested in response to Question 4.
8	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Evoenergy	Generally No, as participants understand their obligations and already report to AER. May want a monthly automated report for FRMP/MC where: Defect field populated, and SiteRemediationStatus is Third[or Final]Notice, and SiteRemediationDate is older than 60 business days.
9	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	INTEGP	No, we would not be requiring standing data quality reports for us to meet our obligations as related to site defects.
10	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Origin Energy	Origin recommends a new SQ report to be developed and sent to the current FRMPs every week as an RM-xx individual results and summary report. The key components of this RM report should provide any errors in the standing data, e.g. NMIs with missing values in Site Remediation Status and Dates where defect has been flagged.
11	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	PlusES	PLUS ES supports that standing data quality reports would deliver benefits. Some SDQ proposals for consideration: <ul style="list-style-type: none"> • A report identifying a Defect flag has been assigned and Remediation status has not been entered. • Remediation status is not updated within timeframes i.e. first notice enumeration is greater > 3mths, should have changed to second notice or remediation successful.

No.	Question Number	Question	Participant	Participant Comments
				<ul style="list-style-type: none"> A Remediation Successful status >20 business days and no meter exchange.
12	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	Red & Lumo	Red and Lumo have not identified any requirement for standing data reports to meet procedural obligations.
13	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	SAPN	No comment.
14	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	TasNetworks	TasNetworks believes that it will not have any procedural obligations in relation to site defects and, therefore, will not have any SDQ reporting requirements.
15	4	Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors
1	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	AGL	<p>Our preference is Option 2, where the relevant metering Party who sets the Flag can use the same transaction to set Defect Flag to Null or Rectified. When this is submitted, the Site Remediation Status and Date will be set in MSATS. We believe this will limit instances of flags being updated incorrectly and increases the integrity of standing data.</p> <p>AGL also notes, that as a site with Defects is exempted from the Retailer Obligations to replace a meter, that comprehensive history and status update reports of this field against the NMs will also be required. This should be factored into the AEMO build.</p> <p>Further, AGL also considers that there is no reason the defect process should end with the LMRP obligations. This process can be expanded to include COMMS meters (and manage the inevitable fleet of legacy meters which will remain in the NEM for many years to come).</p>
2	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Alinta Energy	Alinta supports Option 1 - the auto update of MSATS following a successful meter exchange being processed in market. As a participant, we would expect to have a B2B transaction receipted that acknowledges the clearance of the field and effective date associated with this.
3	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Ausgrid	Ausgrid supports option 1 or 2.

No.	Question Number	Question	Participant	Participant Comments
4	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Bluecurrent	Yes we support MSATS nulling out defect fields on a Smart meter exchange. Option 1. On a CR 30xx that indicates a smart meter has been installed the flag is nulled out.
5	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors
6	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	EA	Option 2, is preferred. This will give an audit trail to follow if required and will also be able to be managed by just the one party raising the CR and then AEMO being able to manage the updates.
7	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Energy Queensland	Energy Queensland's preferred option is Option 1. We are of the view that this is the best approach as it is automated and will reduce the risk of sync issues between flags and status. Further, due to the meter exchange only being able to be completed following the rectification of any site defects, the option to update the relevant defect fields automatically minimises any risk of participants failing to update or incorrectly updating these fields. In some scenarios the updating of a meter exchange in MSATS may also be actioned via the completion of a CR3050/51 to remove the legacy meter and a CR3000/01 to install the smart meter. We would appreciate clarification from AEMO as to whether the completion of this pair of transactions (actioned together) would also trigger the defect fields to be nullified?
8	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Evoenergy	Option 1 does not include what to do if a 3051 and 3001 are submitted instead of a 3004/3005. Preferred Option 2
9	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	INTEGP	Option 1: For 3004/3005 or 3090/3091 only, where a legacy meter has been replaced on-site, the Defect Flag, Site Remediation Status and Date will be set to Null by AEMO. This option has the least development and administrative overhead.
10	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Intelliub	Our 1st preference is option 1 because this option: <ul style="list-style-type: none"> • results in a lower volume of transactions in the market compared to the other options

No.	Question Number	Question	Participant	Participant Comments
				<ul style="list-style-type: none"> helps to avoid having conflicting information - the other options require multiple participants to use multiple CRs to update the information in MSATS which means for a period of time the information in MSATS would be conflicting <p>Our 2nd preference is option 3 because this only requires us to create in our system 1 CR code to update and clear the defect flag (unlike option 2 where 1 CR code is required to set the defect flag and another CR code is required to clear the defect flag)</p>
11	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Origin Energy	Origin supports option 1, i.e. where a legacy meter has been replaced on-site, the Defect Flag, Site Remediation Status and Site Remediation Date will be set to Null by AEMO.
12	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	PlusES	<p>PLUS ES supports that the defect process scope should be expanded to include COMMS metering sites with defects and that it is maintained beyond the LMRP timeframe.</p> <p>We support AEMO's option 1 proposal for legacy meters as this would reduce the volume of transactions in the market. However, this option must be expanded to include COMMS meters. Where a 3004/05 or 3090/91 changes the meter number for an existing COMMS meter, the defect attributes are set to NULL or an alternative value.</p>
13	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	Red & Lumo	<p>Nullifying the defect when a legacy meter has been replaced on-site, and a CR 3004/3005 or 3090/3091 is received seems simplest, however;</p> <p>. What if the defect is identified after a MFN behind a Type 4 comms meter?</p> <p>. What if the defect affects a Type 4 comms meter in a Shared Fuse arrangement with a Type 5 or 6 meters?</p> <p>It is preferable for the MC to set the defect field to NULL when the new meter is installed and the site defect is confirmed to be resolved.</p>
14	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	SAPN	SAPN sees Option 1 as the most efficient process and is our preferred option.
15	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	TasNetworks	<p>TasNetworks believes that option 1 would be the preferred approach. This would negate the need for participants to send transactions and reduce any time delay of the records being nullified.</p> <p>TasNetworks does, however, note that option 1 would also need to include CR3001 transactions. Alternatively, a daily check of MSATS could be done on all</p>

No.	Question Number	Question	Participant	Participant Comments
				NMIs where the defect fields are not null and the meter class code is not a legacy meter type, and if true, then null the defect fields.
16	5	Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors
1	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	AGL.	No.
2	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Alinta Energy	Please see above.
3	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Ausgrid	No.
4	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Bluecurrent	No.
5	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	CitiPower Powercor	CitiPower Powercor does not consider the proposed change to be applicable to Victorian distributors
6	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	EA	N/A
7	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Energy Queensland	As stated above, our preferred option is the proposed Option 1. However, we would appreciate further clarification as to whether AEMO has considered a mechanism to notify all Retailers of a defect, where a defect has been identified at a shared fuse installation by the original attending Metering Coordinator that will impact all NMIs. Additionally, we are of the view that there would be value to participants in having the defect flag to also identify the defect type and for a simplified process for tracking customer notices to be managed by retailers.
8	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Evoenergy	At Step 3 of the Site Defect, Step ID 7. This was already set to SecondNotice in Step 2 of the Site Defect. This should read ThirdNotice or FinalNotice.

No.	Question Number	Question	Participant	Participant Comments
9	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Origin Energy	No further comments
10	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	PlusES	In addition to the above, PLUS ES proposes the enumerations for a Defect flag are NULL, Y (Yes) and N (No), where: <ul style="list-style-type: none"> • NULL= no defect has been identified for this site • Y = Defect exists on site preventing metering installation and • N = Defect existed on site but is no longer present
11	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	Red & Lumo	Providing a Date Identified field for the MC site defect CR 50XX removes the requirement for a new CR to be created for retailer notifications (presuming amendment of the AEMC rule) and thus reduces the total number of enumerations as well.
12	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	SAPN	No comment.
13	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	TasNetworks	As per response the question 5, TasNetworks suggests an alternative approach for consideration, under which AEMO could perform a daily check on all non-extinct NMIs in MSATS to identify where the defect fields are not null and the meter class code is not a legacy meter type, and if true, then null the defect fields.
14	6	Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	United Energy	United Energy does not consider the proposed change to be applicable to Victorian distributors



Additional Feedback

PLUS ES

Technical Solution Description - Inclusion of Greenfield NMI Status

- Clarification is required on the inclusion of this NMI status. One assumes that a Greenfield site does not have a meter installed, and since the introduction of Power of Choice, if it did, it would be a Type 1-4. This would require a data clean up activity rather than including them in the LMRP.
- PLUS ES would expect that a greenfield site would never be sent as a LMRP meter exchange. It would be a 'New Connection'.

Technical Solution Description - LMRP standing data set to NULL upon completion of a meter exchange from BASIC / MRIM to COMMS* / MRAM.

- PLUS ES recommends that the LMRP Standing Data set is not updated to NULL following a meter exchange from Basic/MRIM to a COMMSX/MRAM. One of the benefits of including the LMRP in MSATS is having one source of truth for the LMRP schedule and associated reporting.

RoLR List of Submissions

No.	Question	Participant	Participant Comments
1	Do you agree with the removal of the RoLR reports as proposed? If not, why?	AGL	<p>AGL supports the proposed changes.</p> <p>AGL notes that the various diagrams and cross references within the AEMO documents are out of alignment.</p> <p>As part of this set of changes, the Document needs to be edited to update diagrams and ensure correct referencing within these procedures.</p>
2	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Alinta Energy	No preference recorded.
3	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Ausgrid	Yes. Ausgrid notes that the referencing in the procedures has not been updated and do not align. Suggest AEMO conduct a review and update as required.
4	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Bluecurrent	<p>Editorial - Section 11.2 should be reviewed there are clauses which make reference to other clauses which appear to be incorrect due to new numbering. Eg.</p> <p>(g)(e) For each <i>NMI</i> identified by running the report specified in section 11.2(f), individually update the records for each of those <i>NMIs</i> to change their FRMP from the Failed Retailer to the <i>RoLR</i> and, for the period from the RoLR Effective Transfer Date to the date that is the day before the date the Current FRMP became the FRMP.</p> <p>(h)(f) In completing section 11.2(f), do not change any Roles other than the FRMP.</p> <p>(f)(g) In completing section 11.2(f), apply the following for each individual <i>NMI</i>:</p> <p>And</p> <p>(k)(i) In the email referred to in section 11.2(i):</p> <ul style="list-style-type: none"> (i) Confirm that all updates of FRMPs are now completed; and (ii) If there are no RoLR Roles to update and section 17 is not required (because the Failed Retailer is still operating in some Jurisdictions), confirm that there are no other updates required in MSATS. <p>(l)(i) Compliance with section 11.2(i) is not required if there are further updates to do in MSATS.</p> <p>And</p>



No.	Question	Participant	Participant Comments
			<p>15.1. Conditions Precedent</p> <p>(a) The MDP has received any of the following:</p> <p>(i) An Change Request Notification with a COM status for a change of FRMP generated as a result of the application of section 10.1(c), 11.2(d)(iv), 11.2(e)(iii), 11.2(i)(v), 13.3(d)(v), or 13.3(i)(v) advising, for each RoLR Event Affected NMI where the Failed Retailer was the Current FRMP, which <i>Market Participant</i> is the New FRMP and the date of effect of the change (the <i>ActualChangeDate</i> in the Change Request Notification), which is the RoLR Effective Transfer Date.</p> <p>Note: Change Request Notifications generated as a result of the application of section 11.2(d)(iv), 11.2(e)(iii), 11.2(i)(v), 13.3(d)(v), 13.3(e)(iii) or 13.3(i)(v) will be easily identifiable because they use the Change Reason Code of <i>ROLR</i>. The <i>NMIs</i> for which COM status Change Request Notifications are generated as a result of compliance with section 10.1(c) are not so easily identified because they will have a <i>business as usual</i> Change Reason Code. These ones are able to be identified from the report supplied by AEMO in compliance with section 10.1(g).</p> <p>And</p> <p>18.1. Conditions Precedent</p> <p>AEMO has sent the email indicating that all updates to MSATS are complete, required by one of sections 11.2(k)(ii), 12.2(f), 13.3(m)(ii), 16.1(f), or 17.2(b).</p> <p>Note: The section that triggers the requirement to send the email will depend on what tasks are required.</p> <p>And</p>

No.	Question	Participant	Participant Comments
			<p>103.2. Conditions Precedent</p> <p>(a) The MDP has received any of the following:</p> <p>(i) An MSATS Change Request Notification with a COM status for a change of FRMP generated as a result of the application of clause 10.1 c), clause 11.2 d) iv), clause clause 11.2 h) v), clause 13.3 d) v) or clause 13.3 h) v), advising, for each RoLR Event Affected NMI where the Suspended Retailer was the Current FRMP, which <i>Market Participant</i> is the New FRMP and the date of effect of the change (the <i>ActualChangeDate</i> in the MSATS Change Request Notification), which is the RoLR Effective Transfer Date.</p> <p>Note: MSATS Change Request Notifications generated as a result of the application of clause 11.2 d) iv) or clause 13.3 d) v) will be easily identifiable because they use the Change Reason Code of <i>ROLR</i>. The <i>NMIs</i> for which COM status MSATS Change Request Notifications are generated as a result of compliance with clause 10.1 c) are not so easily identified because they will have a <i>business as usual</i> Change Reason Code. These ones are able to be identified from the report supplied by AEMO in compliance with clause 10.1 g).</p>
5	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Citipower Powercor	CitiPower Powercor supports the RoLR reports being removed
6	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Energy Australia	Yes EA support this
7	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Energy Queensland	Energy Queensland agrees with the removal of the Retailer of Last Resort reports as proposed.
8	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Evoenergy	Yes, too many to monitor yet generally have the same information. There are References in this document that refer to sections deleted [11.2.(f)]
9	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Enedeavour Energy	We agree with the removal of the ROLR reports as proposed.
10	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Intellihub	<p><u>Glossary and Framework document</u> We suggest the term 'RoLR Event Affected MSATS Participant' be updated to include the current MC in the Glossary and Framework document <u>ROLR Processes Part A</u> Figure 2 High Level ROLR Process Diagram:</p>

No.	Question	Participant	Participant Comments
			<p>The ROLR Procedure mentions reports as Group 1, Group 2 and Group 3 in Figure 2 (High level ROLR process diagram) and Figure 3 (High level ROLR process timeline). However it is not clear which report belongs to which group. Could the ROLR Procedure be updated to make it clearer which report belongs to which group?</p> <p>Clause 5.1.a: If reports are to be moved to participant outbox then we need a better notification process and this should be clearly documented. We note in clause 5.1.a AEMO has an obligation to only send a notification to a RoLR Affected MSATS Participant within 1 business hour of a ROLR event being declared. However for AEMO to determine RoLR Affected MSATS Participants AEMO would need to determine the NMs impacted and the participants for these NMs, which will require time and effort for AEMO. We believe it would be more effective if AEMO informs all participants in the NEM at this step of the process. Therefore, we suggest clause 5.1.a be updated to: Within one Business Hour of the announcement of the occurrence of a RoLR Event by a Regulator, send an email to each RoLR Key Contact and issue a market notice advising of the following:</p> <p>Clause 5.1.a.i: We suggest the following be added: participant id of the failed retailer, effective date and time of the when the failed retailer is not allowed to operate and the jurisdiction the failed retailer is not allowed to operate</p> <p>Clause 6.1 It is not clear why AEMO is obligated to produce ROLR_001 (clause 6.1.a) but only deliver this report after completing the steps described in sections 11 and 12 (clause 6.1.d.iii) – are you able to clarify this?</p> <p>Clause 7.1.b: We suggest MPB be added</p> <p>Clause 7.2: Of all the reports the most important for us is ROLR_013 because it provides the list of NMs. However, the timing of this report, as defined in section 7.2, is after completion of obligations defined in section 6.1(d), which is updating the FRMP in MSATS away from the Suspended Retailer. We believe this report should be delivered before MSATS gets updated otherwise it will have little value. Could you please confirm what is the prerequisite for ROLR_013 and if necessary update the ROLR Procedure to make this clearer?</p> <p>APPENDIX 1. Specifications for RoLR reports</p> <ul style="list-style-type: none"> • ROLR_014: We agree that ROLR_014 can be deleted if ROLR_013 got updated to include NMs where the failed retailer is the ENLR. If ROLR_013 is not updated then ROLR_014 should be maintained. ROLR_014 is required for contestable MC/MP/MDP to manage inflight service orders – see clause 104.7.i • ROLR_016: suggest this be deleted. Currently LNSPs only have visibility of CR1xxx when it is COM therefore we believe this report is now redundant • ROLR_017: reword/redesign report to capture CRs where the proposed change date is before the ROLR effective transfer date and the end date is null or greater than the ROLR effective transfer date • ROLR_021: suggest this be deleted. There is no obligation on the Suspended Retailer related to this report • ROLR_022: suggest this be deleted. Currently LNSPs only have visibility of CR1xxx when it is COM therefore we believe this report is now redundant • ROLR_024: since a new MDP cannot be nominated with a CR1xxx we suggest it says ‘for each existing MDP’ instead of ‘for each existing or new MDP’ • ROLR_027 and ROLR_028: suggest the description makes reference to the RoC process to make it clearer what is the intent of this report

No.	Question	Participant	Participant Comments
			<ul style="list-style-type: none"> ROLR_031: suggest this be deleted because at best this is a 'nice to have' report <p><u>ROCL</u> The ROCL has a tab called 'All RoLR Information', however it is not clear what information it is trying to convey here – are you able to elaborate on what is the intent of this tab and how this information is used during a ROLR process?</p>
11	Do you agree with the removal of the RoLR reports as proposed? If not, why?	Origin	Origin agrees with the proposed approach
12	Do you agree with the removal of the RoLR reports as proposed? If not, why?	PLUS ES	PLUS ES supports the removal of the proposed reports.
13	Do you agree with the removal of the RoLR reports as proposed? If not, why?	SA Power Networks	SAPN supports the proposed change.
14	Do you agree with the removal of the RoLR reports as proposed? If not, why?	United Energy	United Energy supports the RoLR reports being removed
15	Do you agree with the removal of the RoLR reports as proposed? If not, why?	TasNetworks	TasNetworks agrees with the removal of the reports identified
16	Do you agree with the removal of the RoLR reports as proposed? If not, why?	United Energy	United Energy supports the RoLR reports being removed

ICF 077 - List of Submissions

No.	Question	Participant	Participant Comments
1	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	AGL	AGL supports the proposed changes.
2	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Alinta Energy	Agree.
3	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Ausgrid	Yes
4	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Bluecurrent	No comment -not impacted.
5	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	CitiPower Powercor	CitiPower Powercor supports the proposed changes.
6	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Energy Australia	Yes EA supports this
7	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Energy Queensland	Energy Queensland agrees that the proposed changes will achieve the desired objective.
8	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Evoenergy	Yes, reduces Change Requests therefore market traffic. Simplifies participant system requirements and costs, especially new participants.
9	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	INTEGP	We agree with the proposed changes for AEMO to automate populate the LCCD field based on NMI status.
10	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Origin Energy	Origin agrees with the proposed changes associated with this LCCD field

No.	Question	Participant	Participant Comments
11	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	PLUS ES	For future consultation consideration, PLUS ES supports having marked up documents at this stage would have enabled a more efficient and robust review of impacted documents.
12	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	Red Energy and Lumo Energy	Red and Lumo support this proposal
13	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	SA Power Networks	SAPN supports the proposed changes.
14	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	TasNetworks	TasNetworks agrees with the proposed change. We acknowledge this will reduce transaction volumes for the initial setting of the LCCD for new NMIs. To be effective, retailers will also need to ensure they disable any existing automated generation of CR5056/5057 transactions upon G to A transition, else the transaction reduction benefit will be diluted.
15	Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	United Energy	United Energy supports the proposed changes.

ICF 078 - List of Submissions

No.	Question	Participant	Participant Comments
1	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	AGL Energy	AGL supports the proposed changes.
2	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Alinta Energy	Agree.
3	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Ausgrid	Yes
4	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Bluecurrent	Yes
5	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	CitiPower Powercor	CitiPower Powercor supports the proposed changes.
6	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	EnergyAustralia	Yes EA support this
7	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Energy Queensland	Energy Queensland agrees that the proposed changes will achieve the desired objective.
8	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Evoenergy	This is a long and awaited change to align the B2B and B2M address requirements.
9	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	INTEGP	We agree with the proposed changes
10	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Intellihub	For FlatOrUnitType, we believe the abbreviations defined in AS4590.1:2017 is more meaningful than what is defined in aseXML, therefore we suggest the aseXML be updated with the abbreviations defined in AS4590.1:2017 as opposed to describing the name mapping from AS4590.1:2017 to the aseXML. For example, for Factory having an abbreviation of 'FCTY' is more meaningful than 'F' and for Warehouse having an abbreviation of 'WHSE' is more meaningful than 'WE'.
11	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Origin Energy	Origin agrees with the proposed changes associated with address fields and supports the concept of establishing an Energy Addressing Standard linked to AS4590.1:2017. Having said that, Origin highly recommends a single release cycle to implement these schema changes across the board to ensure there are no address element mismatches in participants' application systems, especially for those who operate in both electricity and gas markets.
12	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	PLUS ES	PLUS ES agrees with the proposed changes.



No.	Question	Participant	Participant Comments
			For future consultation consideration, PLUS ES supports having marked up documents at this stage would have enabled a more efficient and robust review of impacted documents.
13	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	Red Energy and Lumo Energy	Red and Lumo agree with AEMO's assessment and suggest Option 2 is preferable.
14	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	SA Power Networks	SAPN supports the proposed changes. However, we do not believe there is any urgency to implement this change. Given this change require changes to the schema, SAPN see it should not proceed on its own and can wait to be included with other changes where a schema change is justified.
15	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	TasNetworks	TasNetworks agrees with the proposed approach and believes it should achieve the desired objective.
16	Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	United Energy	United Energy supports the proposed changes.

ICF 079 - List of Submissions

No.	Question	Participant	Participant Comments
1	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	AGL Energy	AGL supports the proposed changes.
2	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Alinta Energy	Agree.
3	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Ausgrid	Yes
4	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Bluecurrent	Yes
5	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	CitiPower Powercor	<p>CitiPower Powercor suggests the proposed changes still provide ambiguity and seeks clarification on the following:</p> <p><u>Section 4.4 Interval data record (300)</u></p> <ul style="list-style-type: none"> • 300 record - <i>Where the same QualityMethod and ReasonCode apply to all IntervalValues in the 300 record, the QualityMethod, ReasonCode and ReasonDescription in the 300 Record must be used. If either of these fields contains multiple values for the IntervalValues, the QualityMethod in the 300 record must be set to "V" and the 400 record must be provided</i> Does this imply we can't have (use?) multiple codes (eg 79, 89, and 61) and also use "A"? • Quality method - <i>The QualityMethod applies to all IntervalValues in this record. Where multiple QualityMethods or ReasonCodes apply to these IntervalValues, a quality flag "V" must be used</i>

No.	Question	Participant	Participant Comments
			<p>As above, does this imply we can't have (use?) multiple codes (eg 79, 89, and 61) and also use "A"?</p> <p>Section 4.5 Interval event record (400)</p> <ul style="list-style-type: none"> • 400 record - <i>This record is mandatory where the QualityFlag is 'A' or 'V' in the 300 record and the quality or reason codes are not the same across the entire day, then the 400 line must be provided</i> <p>Does this now imply we can have (use?) an "A" with multiple codes?</p> <ul style="list-style-type: none"> • Quality method - <i>If quality flag = "A" no method required</i> <p>For reason codes 79, 89, and 61 a quality method must be provided.</p> <p>CitiPower Powercor recommend the following word amendment: "If quality flag = "A" the method is optional" or "If quality flag = "A" the method must be provided if it is 79, 89, or 61"</p>
6	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	EnergyAustralia	Yes EA support this
7	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Energy Queensland	Energy Queensland agrees that the proposed changes will achieve the desired objective.
8	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Evoenergy	Yes. It allows clearer usage of what is already the current practice.No comment
9	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	INTEGP	Yes we agree with the proposed changes
10	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Origin Energy	Origin has no objections with this proposal
11	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	PLUS ES	PLUS ES supports the changes.

No.	Question	Participant	Participant Comments
12	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	Red Energy and Lumo Energy	Red and Lumo support this change as it appears to address the issue.
13	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	SA Power Networks	SAPN supports the proposed changes.
14	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	TasNetworks	TasNetworks acknowledges that the proposed changes should remove any interpretation discrepancy. We note however that the words 'then the 400 line must be provided' are superfluous and are not required, as it is stated that 'This record is mandatory where....'
15	Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	United Energy	<p>United Energy suggests the proposed changes still provide ambiguity and seeks clarification on the following:</p> <p><u>Section 4.4 Interval data record (300)</u></p> <ul style="list-style-type: none"> • 300 record - <i>Where the same QualityMethod and ReasonCode apply to all IntervalValues in the 300 record, the QualityMethod, ReasonCode and ReasonDescription in the 300 Record must be used. If either of these fields contains multiple values for the IntervalValues, the QualityMethod in the 300 record must be set to "V" and the 400 record must be provided</i> Does this imply we can't have (use?) multiple codes (eg 79, 89, and 61) and also use "A"? • Quality method - <i>The QualityMethod applies to all IntervalValues in this record. Where multiple QualityMethods or ReasonCodes apply to these IntervalValues, a quality flag 'V' must be used</i> As above, does this imply we can't have (use?) multiple codes (eg 79, 89, and 61) and also use "A"? <p><u>Section 4.5 Interval event record (400)</u></p> <ul style="list-style-type: none"> • 400 record - <i>This record is mandatory where the QualityFlag is 'A' or 'V' in the 300 record and the quality or reason codes are not the same across the entire day, then the 400 line must be provided</i> Does this now imply we can have (use?) an "A" with multiple codes? • Quality method - <i>If quality flag = "A" no method required</i>



No.	Question	Participant	Participant Comments
			<p>For reason codes 79, 89, and 61 a quality method must be provided.</p> <p>United Energy recommend the following word amendment: "If quality flag = "A" the method is optional" or "If quality flag = "A" the method must be provided if it is 79, 89, or 61"</p>

Embedded Network Settlement Anomalies - List of Submissions

No.	Heading	Participant	Participant Comments
1	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	AGL	<p>AGL does not support these changes at this stage.</p> <p>While we understand AEMO's proposal in limiting retrospective changes may allow for more accurate settlements, we believe this proposal requires further discussion to understand how this impacts genuine error correction scenarios that may occur, in addition to other issues that may not be immediately apparent.</p> <p>AGL believes that this may generate unintended consequences for industry and customers in its current state. Accordingly, AGL would welcome the opportunity to work with industry participants and AEMO to further explore this – potentially with the establishment of a targeted working group.</p>
2	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	Alinta Energy	No preference recorded.
3	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	Ausgrid	With the future implementation of Flexible Trading Arrangements, Ausgrid believes that this issue should be further discussed with industry rather than a blanket rule. AEMO should audit ENMs for compliance and report any discrepancies to the AER.
4	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively 	Bluecurrent	It is unclear what retrospect means in this context. Most metering related CR's are submitted retrospectively. This is because it takes a number of days after a meter has been installed or reconfigured for the MP to perform QA tasks and for the MDP to raise CR's to establish/update Datastreams. For example, if we lose connectivity to an EN child meter the MDP will dispatch a field resources to investigate. Should the outcome be that the meter has been deenergised then the MDP will need to be to set the effective date retrospectively to the date communication were lost. Limiting the MDP to only prospective CR's will become a barrier to MDP's meeting their obligations. We do not agree until these issues are addressed.

No.	Heading	Participant	Participant Comments
	If not, why?		
5	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	CitiPower Powercor	CitiPower Powercor supports the proposed changes
6	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	EA	EA would support this position of our EMN to ensure that they can still function and facilitate EN settlements as required for TENC.
7	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	Energy Queensland	<p>Energy Queensland is of the view that, in general, the proposed changes would assist in managing the identified issues, however, we would appreciate further information on the investigations AEMO has completed in formulating the proposed changes. This would better allow participants to fully understand the issues, possible solutions and any flow on impacts to other participant activities.</p> <p>Of particular concern, is the lack of detail around where the change would apply and how it would be implemented. The current proposal appears to be a blanket ruling that no retrospective changes to NMI or data stream status will be allowed for an embedded/child connection point. We are of the view that there may be valid reasons that an Embedded Network Manager and a Metering Data Provider may be required to make retrospective changes to NMI or data stream status. For example, this could be the result of an error correction or updates resulting from information provided by other participants after agreements or changes have been made. Practically, most, if not all, these status changes are actioned retrospectively due to business and system process flows.</p> <p>We would appreciate further clarification from AEMO as to whether the proposed changes are intended to be restricted to specific NMI/Customer types (e.g. Small</p>

No.	Heading	Participant	Participant Comments
			Generation Aggregators) but would not be applicable to other embedded connection points?
8	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	Evoenergy	No comment
9	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	INTEGP	Yes, we agree with the proposed changes.
10	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	Intellihub	<p>We acknowledge the issue AEMO is looking to address is a valid concern, however we believe AEMO's proposed solution has unintended impacts because it will:</p> <ol style="list-style-type: none"> Limit the ENM's and MDP's ability to perform error corrections, which usually is for an effective start date that is weeks or months in the past. Limit the ENM's and MDP's ability to perform Business As Usual obligations, which usually is for an effective start date that is days in the past. <p>We believe this unintended impact will not only impact the ENM's and MDP's ability to meet their obligations but also impact on AEMO's settlement too because AEMO will not have all the metering data that AEMO should be getting.</p> <p>We suggest an industry focus group be scheduled where a deep dive of the root cause can be considered and various industry participants can collaborate on alternative solution options.</p> <p>Note, although the issues paper talks about Small Generation Aggregator (SGA) given they have been replaced with Small Resource Aggregator (SRA) since IESS started, I will be referencing SRA moving forward.</p> <p>A suggested option for consideration is to have a process whereby the NMI status for a SRA within an embedded network be managed by AEMO given that AEMO is responsible for the registration and deregistration of small generating units under a SRA and a SRA must settle all their registered generating units in the spot market.</p>

No.	Heading	Participant	Participant Comments
11	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	Origin Energy	<p>Origin has concerns with AEMO's proposal and do not agree with the proposal to no longer allow retrospective NMI activation and deactivation as it will have a negative impact on our on-market embedded network (EN) customers. All NMI activations and de-activations are retrospectively applied. This is due to us being notified after the fact of a meter change. No longer allowing for these changes to be retrospectively applied will cause billing issues for our on-market customers.</p> <p>To provide further context, the instance where an EN customer has gone on-market (i.e. left the embedded network), it often takes 2-3 days (sometimes up to a week) for a meter replacement to take place and then advise Origin of the new meter.</p> <ul style="list-style-type: none"> Origin ENM then process a change request to update the status of the NMI to reflect that the new meter is "A" = Active If the customer is moving to off-market, we change the status to "N" = Non-Active. <p>These advices, as to the change of meter, can only be processed by us once we are advised of the new meter details. We then back-date the status change to equal the meter exchange date. The status change date is important, as this is the official date that the new Retailer can take over the billing for this meter.</p>
12	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	PlusES	<p>PLUS ES does not support the proposed changes as the approach is placing a blanket rule across all retrospective updates:</p> <ul style="list-style-type: none"> Current MSATS logic determines all changes are retrospective. The Embedded Network processes are likely to be manual, giving rise to 'legitimate' use cases where retrospective updates would be required. The proposed changes would extend to secondary settlement points (Unlocking CER Benefits). This rule change has not been finalised and the industry has not had the opportunity to understand the downstream implications. <p>PLUS ES recommends:</p> <ul style="list-style-type: none"> Further discussions are held with industry participants and options/impacts are explored. A report is developed to identify repetitive retrospective updating (criteria to define repetitive) and participants audited. AEMO considers removing this item from the current consultation and including it in the Unlocking CER Benefits associated AEMO consultations. This would also enable participants to further familiarise themselves with the rule changes, consider the upstream and downstream impacts and provide better informed feedback.
13	<p>Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively 	Red & Lumo	<p>Red and Lumo suggest that a blanket ban on retrospective changes to NMI status or datastream is problematic because there are valid reasons why these may need to be retrospectively amended, however there is clearly a problem.</p> <p>Can the problem be addressed in another manner rather than removing the ability for retrospective changes?</p>

No.	Heading	Participant	Participant Comments
	<ul style="list-style-type: none"> the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively If not, why?		<ul style="list-style-type: none"> Identifying how this action is contrary to the best interests of the NEM or conflicts with obligations. Identifying the participant or customer who initiates these changes in a manner that is contrary to the best interests of the NEM.
14	Do you agree with the proposed changes to limit: <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively If not, why?	SAPN	No comment.
15	Do you agree with the proposed changes to limit: <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively If not, why?	Tasnetworks	Although not directly impacted by this issue, TasNetworks considers that retrospective activation/deactivation of NMIs and datastreams may be required in the process of creation and removal of embedded networks for alignment with the parent NMI.
16	Do you agree with the proposed changes to limit: <ul style="list-style-type: none"> the ability of ENMs to activate and deactivate NMI(s) retrospectively the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively If not, why?	United Energy	United Energy supports the proposed changes.



Additional Feedback

AGL: Service Order and CR Enumerations

AGL notes that this consultation includes a number of amendments to existing enumeration sets as well as the creation of new enumeration sets. AGL strongly notes that all these enumeration sets should be removed from the aseXML schema and published externally to allow more efficient management of these enumerations