

2024 Metering Services Review Package 1 Consultation

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: AGL Energy

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1. Context

This template is to assist stakeholders in giving feedback on the content of the initial draft of the 2024 Metering Services Review Package 1.

2. Feedback on the Implementation of the AEMC Metering Services Review Rule

Question - LMRP	Participant Comments
<p>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?</p>	<p>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.</p>
<p>2) Are the proposed tools (BUT and CRs) adequate to update the LMRP field?</p>	<p>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.</p>
<p>3) Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?</p>	<p>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.</p>

Question - LMRP	Participant Comments
<p>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?</p>	<p>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.</p> <p>Some possible standing reports could cover:</p> <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 • NMIs where customer has advised rectification / remediation
<p>5) Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?</p>	<p>Currently, no.</p>

Question - Defects	Participant Comments
<p>1) Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?</p>	<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>
<p>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?</p>	<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>

<p>3) Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?</p>	<p>In line with our position of changes to the proposed rule change in question 2), we believe <i>'FirstNotice'</i> & <i>'SecondNotice'</i> 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 <i>'RemediationSuccessful'</i> to <i>'RemediationAdvised'</i>. 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 <i>'RemediationAdvised'</i> or <i>'RectificationAdvised'</i>.</p>
<p>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?</p>	<p>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.</p>

<p>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?</p>	<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 NMIs 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>
<p>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</p>	<p>No.</p>

3. Feedback on the AEMO review of Retailer of Last Resort processes

Question	Participant Comments
<p>1. Do you agree with the removal of the RoLR reports as proposed? If not, why?</p>	<p>AGL supports the proposed changes.</p>

Question	Participant Comments
Clause Referencing	<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>

4. Feedback on the Issues and Change Forms (ICFs)

Question – ICF 077	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 supports the proposed changes.

Question – ICF 078	Participant Comments
2. Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	AGL supports the proposed changes.

Question – ICF 079	Participant Comments
<p>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?</p>	<p>AGL supports the proposed changes.</p>

5. Feedback on Embedded Network settlement anomalies

Question	Participant Comments
<p>1. Do you agree with the proposed changes to limit:</p> <ul style="list-style-type: none"> o the ability of ENMs to activate and deactivate NMI(s) retrospectively o the ability of MDPs to activate and deactivate datastreams in embedded networks retrospectively <p>If not, why?</p>	<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>

General Comments

Issue	Comment
Service Order and CR Enumerations	<p>AGL notes that this consultation includes a number of amendments to existing enumeration sets as well as the creation of new enumeration sets.</p> <p>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.</p>