

2024 Metering Services Review Package 1 Consultation

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Bluecurrent

Submission Date: 11 July 2024

Table of Contents

- 1. Context 3
- 2. Feedback on the Implementation of the AEMC Metering Services Review Rule 3
- 3. Feedback on the AEMO review of Retailer of Last Resort processes..... 6
- 4. Feedback on the Issues and Change Forms (ICFs)..... 9
- 5. Feedback on Embedded Network settlement anomalies 10

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
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?	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.
2) Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	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.
3) Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	No comment – not impacted.
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?	No comment – not impacted.

Question - LMRP	Participant Comments
5) Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	No comment.

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>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>
<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>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.</p>
<p>3) Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?</p>	<p>No. This field is not necessary.</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>It is unclear why these reports would be necessary and for whom? The retailer or the MC.</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>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.</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>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>(i)(g) In completing section 11.2(f), apply the following for each individual <i>NMI</i>:</p> <p>And</p>

Question	Participant Comments
	<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> <p>15.1. Conditions Precedent</p> <ul style="list-style-type: none"> (a) The MDP has received any of the following: <ul style="list-style-type: none"> (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>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>

Question	Participant Comments
	<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> <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>

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?	No comment - not impacted.

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

Question – ICF 079	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?	Yes

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>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.</p>