2024 Metering Services Review Package 1 Consultation

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Intellihub

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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
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?	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). We also support the format of YYYY as this is the minimum information required from the DNSP. 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.
2) Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	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.
3) Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	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.

Question - LMRP	Participant Comments
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?	Yes, reports should be created to identify NMIs with a type 5/6 meter without the LMRP field populated
5) Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	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.

Question - Defects	Participant Comments

1) Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	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.
	We note:
	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'
	However:
	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'
	b) One of the allowable values we wish to define for defect is 'Asbestos'
	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 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.
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?	
3) Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	
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?	

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?	Our 1st preference is option 1 because this option: • results in a lower volume of transactions in the market compared to the other options • 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 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)
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	

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

Question	Participant Comments
1. Do you agree with the removal of the RoLR reports as proposed? If not, why?	Glossary and Framework document We suggest the term 'RoLR Event Affected MSATS Participant' be updated to include the current MC in the Glossary and Framework document

Question	Participant Comments
	ROLR Processes Part A **Figure 2 High Level ROLR Process Diagram:** 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? **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 NMIs impacted and the participants for these NMIs, 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:

Question	Participant Comments
	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
	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?
	Clause 7.1.b:
	We suggest MPB be added
	Clause 7.2:
	Of all the reports the most important for us is ROLR_013 because it provides the list of NMIs. 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?
	APPENDIX 1. Specifications for RoLR reports

Question	Participant Comments
	• ROLR_014: We agree that ROLR_014 can be deleted if ROLR_013 got updated to include NMIs 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 • ROLR_031: suggest this be deleted because at best this is a 'nice to have' report ROCL 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?

Question	Participant Comments

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?	

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

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?	

5. Feedback on Embedded Network settlement anomalies

Question	Participant Comments
1. Do you agree with the proposed changes to limit: o the ability of ENMs to activate and de-activate NMI(s) retrospectively o the ability of MDPs to activate and de-activate datastreams in embedded networks retrospectively If not, why?	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: 1. 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. 2. 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. 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. 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.

	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. 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.