Consolidated feedback for Gas Market Issue (GMI) V3.0 for IN001/21 (RMP amendment to change the treatment of customer-own reads to be actual meter readings).

Question	Ref	Company	Participant Response
1. In relation to Attachment B, ref # 1, JGN has stated that the proposal described in this GMI would not require any change to NGR rule 506. Does your organisation have any comments or issues to raise in relation to JGN view on rule 506? If yes, please provide further details.	1	AGL	NER Rule 506 allows Network Bills to be based on either actual or estimated reads – NGR 506 Cl(2), therefore the provision of CoRs (without amending the source of the read from CoR to Actuals) should make no difference to this obligation.
	2	Alinta Energy	Alinta Energy agrees that this proposal would not require any change to rule 506 of the NGR.
	3	Energy Australia (EA)	There will be no impact to this rule as NER Rule 506 allows for a Network bill to be based on actuals and or estimate reads. So, this is the current business process.
	4	Lumo/Red	Red Energy and Lumo Energy (Red and Lumo) have no comment on JGN's view of NGR rule 506.
	5	Multinet Gas Networks (MGN)	JGN proposed this change for retail Market Procedures (RMP) (NSW/ACT) and has confirmed that they do not want to impose these changes in Victoria, MGN does not support these changes to apply for Victoria and we do not believe that in Victoria there is an issue with "no reads" and that our volumes are low and we have existing market processes in place to enable customer to provide reads to the market.
	6	Origin Energy (OE)	The NGR 506 (2c) rule caters for an estimate or actual read to apply for statement of charges.
	7	Western Energy (WE)	No
	AEMOs overall response to the feedback provided for this question.		
	AEMO notes that none of the responses put forward a view that NGR rule 506 needs to be changed.		
2. In relation to Attachment B, ref # 7, JGN has stated that the that proposal described in this GMI will not results in any issue with NERR rule 21. Does your organisation have any comments or issues to raise in relation to JGNs position that the proposed change will not result in any issues with NERR rule 21? If yes, please provide further details.	8	AGL	In the energy industry metrology hierarchy, a CoR is always deemed to be of a lower quality than an Actual read, on the basis that the network meter reader is more qualified to read the meter. Often the CoR is considered an Estimate. Under this proposal, JGN would verify certain types of CoRs and then change the flag identifying the source of the meter read from C (CoR) to A (Actual). It is unclear why this change is necessary in respect to NERR 21, as the NERR allows customer bills to be based on a CoR or Estimate. The NERR allows a customer to request an adjustment based derived from an Estimate to be adjusted by a CoR [Cl 21 (3A)]. As such, the proposal by JGN to change the data source from C to A would initially mask the fact the data was already provided by the customer (and verified by JGN) and require additional work by the Retailer to confirm that the read was a CoR (Via the JGN Portal) before the Retailer could respond to the customer.
	9	Alinta	Alinta Energy has concerns that the proposal that a customer "*read*" be treated as an actual read, even though the DB's own staff or nominated representative will not have attended the premises, may be inconsistent with the intent of rule 21. The key concern is that this may negate the obligation of the network to attempt to attend the premises and obtain an actual read. This could create longer term access issues and may be sufficient incentive to lead to an increase in bypasses and other illegal activities. Alinta Energy requests that it is ensured that the obligation to attend the premises at least every 12 months to obtain an actual read is not lost with what JGN is proposing. This will satisfy all parties that the data is validated regularly and the meters can be checked for faults.
	10	EA	NERR rule 21 allows a retailer to use an estimated read or a COR for a customer's bill as well as an actual read. There will be no impact.
	11	Lumo/Red	Red and Lumo have no comment on the proposed change in relation to NERR rule 21.
	12	MGN	JGN proposed this change for NSW/ACT and has confirmed that they do not want to impose these changes in Victoria, MGN does not support these changes to apply for Victoria.
	13	OE	NERR rule 20 1 (b) provides for a retailer to bill a small customer on actual or estimated readings. Jemena has attained a no action letter from the AER for a specified period which provides for CoR to be classified as actuals. It's makes sense for Jemena to seek AER position on whether this rule provides for CoR as actuals for the long term.
	14	WE	No
	AEMOs overall response to the feedback provided for this question.		
	AEMO notes that some participants have flagged a concern in relation to consistency between the NERR and what is being proposed in the RMPs. AEMO will follow this up with the AER.		

Question	Ref	Company	Participant Response
3. Currently, the business rules for energy data that is passed to Retailer and AEMO via Meter Data Notification (MDN) that set out in the RMP. This includes the how meter reads are to be treated (including CORs). The proposed changes in Attachment A means that the decision how a COR will be treated will sit with the Network Operator. Does your organisation have any comments or issues to raise in relation to specific part of the proposal? If yes, please provide further details.	15	AGL	As the RMPs already designate how meter data is to be treated depending on its source, allowing the Network Operator to internally change the data source would require additional measures (such as fulsome reporting) to ensure that the various obligations for the provision meter data are being met. Any process which adjusts meter data must be embodied in some form of industry Procedures – either the RMPs or a more generic gas metrology document. Noting that AMEO is proposing that this be widened, then it makes sense that a more generic Gas Metrology Procedure be developed so that these developments can be established across all gas jurisdictions in an aligned and harmonized manner, both in terms of process and treatment of metering data. JGNs comment (B4) notes the potential limitations (eg meter serial No/ QR Code) if the requirements are subject to an industry procedure. We do not consider that allowing the Network Operator carte blanche in this respect a reasonable outcome. A change to many of these requirements, would likely mean downstream issues for either retailers and/or customers. For instance, meter serial numbers are a means used by new customers and retailers to identify MIRNS. if meter numbers were QR codes, then a variety of other processes used by retailers and customers would need further adjustment, so AGL does not consider that these changes should be allowed to occur too quickly or without retailer involvement. The requirements for this should be made in a referenced AEMO Document which might have different consultation requirements (similar to weather station references) which allow fast track for minor issues and more fulsome consultation for critical items.
	16	Alinta	As the DB is changing a data quality flag we would need to ensure this is done following carefully considered rules with relevant obligations on the DB to ensure that the "actual" read is what would have been read directly from the premises To that end, Alinta Energy would support the creation of Metrology procedures that would clarify the position for customer own reads and balance the interests of: • customers in receiving more accurate bills; • network operators in saving costs and reducing SLA breaches when access is difficult for a reason outside their control; and • retailers and their information requirements to permit them to appropriately manage customer issues and their potential exposure to costs incurred which they cannot recharge. These procedures could: • clarify when a customer read is deemed to be an acceptable actual read or is deemed to be an actual read; • set out the circumstances is which customer accepted reads may be replaced (eg fraud); and provide guidance for regulatory documents and how regulatory instruct are impacted,
	17	EA	This process introduces an additional form of meter reading. It must be captured within an industry document especially as more distributors start to use this form of obtaining meter reads.
	18	Lumo/Red	Red and Lumo support the proposal for consumers to provide reads which may be treated as actual, however we do not support the position that the Distributor should have sole discretion defining when and how this read may be validated. Red and Lumo propose that the criteria for processing a reading of a basic meter provided by a customer as an actual read via electronic means should be defined in the RMP consistent with the other approved metrology methodologies. This will support transparent business processes, clear customer communication and simplify the implementation of the proposal by other Distributors or the introduction of the proposal to other jurisdictions if the need arises.
	19	MGN	MGN does not support this change for Victoria, MGN does not have the ability or inbuilt functions that would facilitate in enabling a customer read to be uploaded into our systems as an "A" actual read. MGN also does not believe that a customer read should be shown as an actual read within our database as this would not give clear indication as to whether the read was actually obtained from our meter reading contractor or the customer.
	20	OE	The proposal provides a clear distinction on the conditions for a CoR to be treated as actuals. Jemena do however highlight that prescribing these conditions in the RMPs is unnecessary and may impede them from making further changes as required. Origin disagrees with this and believes it is necessary that the Network Operator provides transparency on the validation criteria's and specifically if any validation conditions were to change. It is recommended that validation conditions that would deem a CoR as valid is referenced and published within an agreed industry document.
	21	WE	No
	AEMOs overall response to the feedback provided for this question.		
	AEMO notes that most responses did not support the idea to have the treatment of COR moved out of AEMO's RMPs and into a document that would be administered by Jemena. AEMO will prepare an alternate drafting of the RMPs to address the concerns raised by Retailers which AEMO will circulate to the GRCF for comment.		

Question	Ref	Company	Participant Response
4. In terms of Impact of Changes, (see section 5 of the GMI) do retailer organisations agree that the proposed change do not require any process or IT system change? If such changes are required provide further details and an estimation of when such changes could be implemented. Do network operator organisations agree that the proposed changes will require process or IT system changes? If such changes are required provide further details and an estimation of when such changes could be implemented.	22	AGL	As proposed, there are no system changes required. However, the change of meter data source and the use of the JGN portal will require some additional business process changes to manage the information and access the portal if there are customer queries or complaints. Processes to communicate access requirements to customers would require specific processes for JGN as the separate reports/portal information would need to be used to generate the access letters to JGN sites.
	23	Alinta	While Alinta Energy agrees that there does not at this stage appear to be a system impact to what JGN is proposing, there will be an impact to the escalation processes and practices with relevant staff now need to manually access reports from JGN to assess whether a read was provided via the Meter Mate App i.e. provide by the customer, or by the DB's own staff or nominated representatives. However, we anticipate that any increase in effort here is potentially offset by a reduction in disputes due to the increase in actual meter reads and the subsequent reduction in estimated bills.
	24	AGN	AGN is not directly impacted by this proposal, as the meter reading provisions of the SA Retail Market Procedures apply to the Wagga Wagga networks, rather than the NSW RMPs.
	25	EA	While it is acknowledged there are no system changes required to implement this initiative, there will be additional processes implemented to add the use of the JGN portal to access information to support customer queries.
	26	Red/Lum	Red and Lumo have identified two circumstances which may require changes, if the proposal goes ahead: 1. The proposal does not define the estimation reason in the circumstance that the customer fails to provide a read. In this case the communication retailers provide to customers advising of their obligation to provide access may need to be amended. 2. If the customer is not promptly notified by JGN that their read has failed to meet criteria, we expect to have to make changes in how we notify and respond to customers about why their bill is estimated.
	27	MGN	MGN does support this change for Victoria. However if it was to be imposed on Victoria this would actually be a significant change to our systems and business processes, MGN has no capacity to implement any new system changes for 2021. MGN does not have systems that would enable a customer to upload a read via a portal system. This would require a major IT change and require a lot of time and money to implement. All current IT works for 2021 have been scheduled and budgeted for and this change would not be able to be accommodated in 2021. Multinet IT and business personnel are heavily involved with implementing the changes for the Q42021 Release.
	28	OE	Retailer systems currently accept actuals or estimated reads; therefore system changes would not be necessary to cater for these read types. We may expect to see some system and process change to cater for Jemena's self-serve reporting. Origin would be keen to contribute to the content and format as this could be loaded into systems to allow for performance reporting and transparency on CoR received.
	29	WE	We agree there would be no material change for the process or IT systems for retailers however in our particular circumstance a small amount of development work would be required to receive any new B2B report into a format that could be processed in our billing system.
	AEMOs overall response to the feedback provided for this question.		
	AEMO notes that some responses flagged the possibility of process or/and IT system changes which is different to the position put forward in the GMI. As noted in the response to question 3, AEMO will prepare an alternate draft of the RMPs. AEMO will attempt to address these process or IT system concerns in the AEMO alternate drafting of the RMPs with a view to minimising any process or IT system changes for participants and AEMO. AEMO also notes AGNs comment that SA Retail Market Procedures apply to the Wagga Wagga networks. AEMO will therefore ensure the IN001/21 proposal will exclude the networks that AGN operates.		

Question	Ref	Company	Participant Response
5. In terms of the likely benefits (see section 6 of the GMI), does your organisation agree with the points raised in this section? Also does your organisation expect that the benefits will outweigh the costs?	30	AGL	The proposed change has two components: 1. Provision of CoRs via an App; 2. Changing the source of data from CoR to A The proposed benefits from the introduction of JGNs app and the processing of verified Customer own Reads can lead to the suggested benefits. These benefits do not require the data to be changed from C to A. The change of the data from C to A however, can lead to other issues further down the track. Eg It will not be immediately clear if a site visit is required that there are potential access issues which could be resolved when initially dealing with the customer, rather than having failed visits. Buildpack 1 already has the necessary schema elements to distinguish between Actual, Estimate, Substitute and CoR Type of Read | Indicator identifying the type of reading which has taken place. | Alpha | 1 | Y | A = Actual, E = Estimated S = Substituted C = Customer Own Read.
	31	Alinta	Alinta Energy agrees with likely benefits that JGN has called out in the GMI however these will need to be balanced against the increased potential for a very small percentage of customers to take advantage of a scenario where they are in control of the data upon which they are invoiced without the check of a DB or their representative attending premises regularly. In order to attain a balance between improved read quality and site security and safety, Alinta Energy would like to see that the obligation to attend the site every 12 months to obtain an actual read by the DB's own staff or their contracted representative retained and re-enforced.
	32	EA	The proposed benefits are supported by EnergyAustralia.
	33	Lumo/Red	Red and Lumo agree that the proposal will likely result in customer experience improvements for those customers who currently experience difficulty in providing access to their meter. Where customers are engaged and actively submit reads, we agree with JGN that there will be improvements in: . the efficiency of the operation of the gas market via more accurate bills. . customer experience for consumers by minimising the frustration from estimated bills.
	34	MGN	Multinet Gas does not support this change for Victoria and can see no benefit in implementing this process.
	35	OE	Origin agrees the provision of photographed CoR submitted electronically to Jemena has merit. This will empower customer who have had estimated reads due to no meter access for a prolonged period of time. Flagging the read as actuals will: - Reduce the volume of queries into call centres to inquire about estimates. -Reduce the need to issue No Access letters requesting an actual read -Reduction in cancel rebills if a customer were to submit a CoR after the network meter read estimate was provided.
	36	WE	Yes, we agree with the points in Section 6. Yes, we agree benefits outweigh costs.
	AEMOs overall response to the feedback provided this question.		
	AEMO notes that all responses agreed that benefits will outweigh the costs.		

Question	Ref	Company	Participant Response
6. Version 1 of the GMI that was tabled at the September 2020 GRCF contained a scope that was limited to just the NSW/ACT gas retail markets. To maintain efficiency for those participants operating in multiple east coast gas retail markets, AEMO believes this initiative should be considered more broadly. As an example, attachment B contains an "initial draft" marked up RMP changes for Victoria and South Australia. For those organisation that participant in gas retail markets in Victoria, Queensland and South Australia, do you support applying largely the same RMP changes in Victoria, Queensland and South Australia? If your organisation does not support, please provide further details on why you do not want this change being applied to Vic, QLD and SA.	37	AGL	Noting that AMEO is proposing that this be widened, then it makes sense that a more generic industry Gas Metrology Procedure be developed so that further alignment and harmonisation can occur in this area, both in terms of process and treatment of metering data across all jurisdictions. It is also noted that this may also be applicable for WA, as the matter of CoRs has been raised in that environment. The proposal to develop consistent approaches to gas metrology processes is strongly supported as this provides greater consistency across the industry.
	38	Alinta	Alinta Energy may support the widening of this proposal to other NECF states but notes that in Vic there is only a 4 month back billing window which may severely limit how effective this proposal can be in Vic, as there is potential for retailers to be exposed to increased bad debt due to failure to identify customer fraud or illegal usage early or difficulty in proving the customer's involvement. We would like to see a more generic gas industry metrology procedure developed to manage the substitution and estimation rules allowed for gas data along with rules regarding validation of data before it can be considered "actual". There is an opportunity to harmonise this approach with what is done in the Electricity Industry. Alinta would not support widening the proposal into Vic.
	39	AGN	AGN would support an industry consultation on similar RMP changes in the other jurisdictions. It would be beneficial to add further clarity that Customer Own Reads can be treated as Actual reads if validated by the Network Operator, by making changes to the definitions of Actual Read, Customer Own Read and Estimated Read. This is as per current APA practice for the AGN networks in Vic, Qld and SA, where the RMP definition of COR does not specify that a COR is taken to be an estimate. CORs delivered direct to the Network Operator are an available option to customers where a scheduled read has not been completed due to no access. If a COR received by the Network Operator is validated by means of manual scrutiny of the index read or photographic evidence, the original skip read Estimated read is cancelled and the COR is sent to AEMO and the retailer as an Actual read. The customer always remains on the meter reading schedule. Benefits of treating validated CORs as actual reads include: • supports the obligation on the Network Operator in SA and the Retailers in other states to obtain an actual read every 12 months, particularly for sites with chronic access issues, such as where gates must be locked or where dogs may escape. Customer feedback has been positive where they have provided a photo with their COR and this read is validated and treated as an actual read. • we would expect negative customer feedback if after providing this information their read was required to be treated as an estimate. • allows for a transfer on a COR where it has been validated by the Network Operator (customers cannot transfer on an estimate in SA). This represents good, customer focused industry practice. There have been no complaints raised by Retailers and customer experience has been very good, with a lot of positive feedback received. We anticipate greater future use of validated CORs as improving technology allows, including smart phone apps to process photographs of meter index readings. It is important therefore that the RMP definitions relevant to CORs around method of delivery and validation are broad enough to manage these future developments.
	40	EA	EnergyAustralia supports AEMO's recommendation that the initiative is developed so a consistent approach to gas metrology processes can be supported and a consist rule across the industry is implemented.
	41	Lumo/Red	Red and Lumo propose that the scope be limited to the NSW/ACT markets until such time as a Distributor in Queensland, South Australia or Victoria has interest and capability in initiating this change in one of those markets. If the change were to be introduced, Red and Lumo consider that any approach to applying these changes in Victoria, Queensland and South Australia would require adoption of the already defined criteria which allows a Distributor to treat a basic meter read provided by a customer via electronic means as an actual read.
	42	MGN	Multinet Gas Network does not support this change, this would require significant process and system changes to enable MGN to manage this new process. As mentioned previously all IT budget and personnel are at capacity for 2021 with focus on R40 schema change. In Victoria our no reads rates are considerably low at 3.4% / month and less than 1% unable to obtain an actual read in a 12month period. and see no benefit in implementing this process. The market already has the ability to provide customer reads to the distributor to help align estimate read were necessary. MGN can see no benefit to implementing this change in Victoria,
	43	OE	Origin supports applying the same RMP changes to other jurisdictions as that will allow for alignment and harmonisation on the treatment of CoR.
	44	WE	Yes
	AEMOs overall response to the feedback provided this question.		
	AEMO notes there is only partial support from respondents to apply the same or similar changes for Victoria, Queensland and South Australia. On that basis AEMO will <u>not</u> incorporate these jurisdictions into this proposal. AEMO will raise a separate initiative for those jurisdictions on the gas issues/ change register. At the next GRCF annual prioritisation session, organisations will be given an opportunity to include this separate initiative/s to the yearly program of work post-2021.		

Question	Ref	Company	Participant Response
7. In relation to Attachment B, has any of the responses that Jemena provided raised any further questions for your organisation? If so, provide detail of which ref # and question you would like clarified	45	AGL	B5 – JGN proposes that this change will empower customers by removing Estimated bills. Changing the meter data source from C to A does not change the read or the basis of the bill, but does make the source of data more opaque and limits the awareness of access issues across industry. B10 – JGN only propose to use the C if the read is not validated per their proposed business rules. A different option is for JGN to only use C when the read is verified and use E for non-validated reads or JGN provided estimates. That would ensure the use of a C read from JGN was clear and only used where they had verified the data.
	46	Alinta	No further questions from Alinta Energy
	47	EA	No
	48	Lumo/Red	Red and Lumo have no further questions in relation to Attachment B of the proposal
	49	MGN	Multinet Gas does not participate in the NSW market
	50	OE	Ref # 2 – Origin shares the same view as AEMO that RMP explicitly states that a customer own read is an estimate. Origin however acknowledges the prosed change in Attachment A to RMP 1.2.1 to include, "except in the case where a Customer submits to the Network Operator a read of a meter which meets the conditions approved by the Network Operator, in which case it shall be taken to be an actual meter reading".
	51	WE	No
	AEMOs overall response to the feedback provided this question.		
	AGL feedback in relation to B10 has merit however, it will result in potential additional IT impacts for all parties including AEMO. Given the potential additional IT impact, the materiality of the benefits outweighing cost presumably will be lower. There is also the issue that Jemena has already implemented business process and IT changes for the current configuration which could further complicate the scope of any material additional process or IT change. AEMO therefore isn't supportive of exploring a broadened technical solution under the current initiative unless the majority of the participants supported this approach.		
8. In relation to Attachment E (FAQ for Retailers) has any of the questions and answers that Jemena provided raised any further questions or comments for your organisation? If so, provide detail of which Q# along with your organization response,	52	AGL	3(a) – There is concern that a customer is swapped between the App and meter read routes with a 2-cycle lag if the customer ceases to send in meter reads. Firstly in that there may be issues between the wait time of attempted reads and the impact on backdated billing obligations In the course of this process, retailers may (or may not) trigger access request letters due to the 2 estimates following the CoR. It is unclear what JGN is /should be doing and what retailers would be doing for access processes. The process as described would see the CoR then no attempted read 3 months and six months later and then a third attempt (likely with no access). Noting that JGN would already know if there was an access issue with his customer, it is expected that the MIRN would be estimated in either event, so it begs the question of what benefit is there in moving them on and off the read routes ? If this process is to be used with sites where there is access, then we'd propose that the customer stays on the route and the meter reader bypasses only if a CoR isn't submitted in time. There are also questions which would need to be raised with legal in regards to the potential impacts on customer billing, which will be asked when this GMI is further bedded down.
	53	Alinta	No further questions from Alinta Energy
	54	EA	No
	55	Lumo/Red	Red and Lumo have no further questions in relation to Attachment E of the proposal

Question	Ref	Company	Participant Response
	56	OE	• Jemena have advised that customers using the app will be taken off the physical meter read route. Even with customer being provided with 2 reading periods to provide consecutive reads, it is envisaged customers will be swapping between self-read cycles and physical read cycles. This poses a risk and is important to understand what controls Jemena have in place to ensure management of sites back to physical routes. • Origin note that Jemena have 3k registered as Gas Mate users. This is a small percentage of the 200k meters that Jemena stated would not be able to be read as per the no action letter to the AER. Given a large portion of sites are providing access and actual meter reads can be obtained on a consistent basis, it's important that this app and proposed solution primarily targets customers with no access issues. It would be beneficial to understand how Jemena is managing to address chronic no access sites as a priority given the GMI advises that the CoR option can be taken up by the Network's 1.4 million customers? Attachment F however states "we are not rolling out to the whole network"? Origin acknowledges that not all CoR will be treated as actuals. For example, where they fall out of a read NSRD window or retailer provided CoR. We believe it is important that the process for customers is transparent and does not lead to confusion. Origin recommends that further work is undertaken with Retailers to eliminate or address such scenarios via a workshop.
	57	WE	NO
	AEMOs overall response to the feedback provided this question.		
	AEMO will consider the feedback provided in response to this question and if required, factor that feedback into the AEMO alternate drafting of the RMPs.		
9. In relation to Attachment F (Supplementary information following the March 2021 GRCF Meeting) has any Jemena's supplementary information raised any further questions or comments for your organisation? If so, provide detail and include a reference to the slides number.	58	AGL	JGN have simply applied additional limitations (JGN Business Rules) to limit this to reads supplied to them via their own app. If a retailer is able to supply a photo to JGN, which can be validated, then AGL would like to see how that would be managed by the JGN process.
	59	Alinta	No further questions from Alinta Energy
	60	EA	*No*
	61	Lumo/Red	Red and Lumo have no further questions in relation to Attachment F of the proposal.
	62	OE	Where customers shift to a self-read cycle, Origin recommends an obligation be placed on the Network Operator to visit the site at least annually to ascertain a meter read.
	63	WE	No
	AEMOs overall response to the feedback provided this question.		
	AEMO will consider the feedback provided in response to this question and if required, factor that feedback into the AEMO alternate drafting of the RMPs.		
10. Does your organization have any other comments in relation section 1 to 8 of this GMI?	61	AGL	See below (Q11)
	62	Alinta	No further comments from Alinta Energy
	63	EA	EnergyAustralia would strongly recommend that the business rules are documented and published with AEMOs procedures. It is also import to be able to receive a report on MIRNs that have had a COR changed to an Actual read.

Question	Ref	Company	Participant Response
	64	Lumo/Red	Red and Lumo have further questions we would like to address to JGN: How is the customer informed if the read provided fails to meet the approved criteria or validation? e.g. . If the data is submitted outside of the approved date window? . If the meter serial is not clearly identifiable in the photo? . If Read is outside High/Low validation? . If Meter appears to be faulty/damaged? In the further development of this solution, we consider that there is value in assessing whether 3 new enumerations can be added to MeterReadFrequency which is provided to retailers by the Distributor in a NMI Standing Data Response and Amend Site Access Details. This will allow a retailer to know at the time of signing a customer up that they are currently subscribed to the customer own read process and can manage the customer expectations and experience accordingly. Current enumerations are: "Bi Monthly" "Monthly" "Quarterly" Consider adding: "Bi Monthly COR" "Monthly COR" "Quarterly COR" Additionally, we propose that the Distributor must attempt a meter read annually in order to meet their obligations under the Safety Laws and the NERR. Finally, we note that Participant Build Pack 1 Table of Transactions includes a customer own read transaction. We consider that there is a comment added for the avoidance of doubt, a read provided and approved by the proposed method should be excluded from that transaction type. see: Ref No 31A and 31B Energy Flow for Customer Own Read
	65	OE	Where a photographic CoR is provided, it is clear that Jemena will provide actual reads where all validation is met. Equally, it is important for Jemena to establish processes when the photo shows issues such as when a meter stops registering or damaged meter.
	66	WE	A significant issue for Weston's business is the inability to get a basic metered customer transferred at a given time, due to the requirement of an actual read needing to be taken. We understand as this proposal currently stands this may assist an actual read being taken on the scheduled read date so for transfers planned on those days it will be of benefit. However a large portion of our basic meter transfers are planned to coincide with SRT reads. Does Jemena plan on allowing a customer to submit a read via the app (and subsequently be treated as an Actual Read) when a retailer has requested a Special Meter Read?
	AEMOs overall response to the feedback provided this question.		
	AEMO will consider the feedback provided in response to this question and if required, factor that feedback into the AEMO alternate drafting of the RMPs.		

Question	Ref	Company	Participant Response
11. Other Matters	67	AGL	Customer Calls If the meter data source is changes, and customer calls are received by the call centre, then it will be difficult for the agent to manage those queries and it is likely that additional and unnecessary service orders will be issued (eg special read, meter test) the costs of which are likely to be borne by the retailers. Process Business Rules We believe that the business process rules for this should not sit with the network operator, but rather be some form of industry or AEMO procedure, with more clarity and transparency on how it is changed. Network Reporting We believe that if this proposal is to continue with the CoR changed to A, then reporting to both individual retailers and the market as a whole is necessary, and that the necessary reporting should be developed in consultation with retailers and AEMO. AGL would wish that there is transparency on how many meter reads are being generated through this process, both for the individual retailer and for market as a whole. Site Access While this proposal will mitigate the high number of bill complaints, the proposal does nothing to mitigate any access requirements to physically service the customer, which includes disconnections (eg move out). Further, because the meter data has been reclassified, retailers will have greater difficulty in identifying which sites which are not having attendance by Network Meter Readers. Safety Matters The reduction in site visits by the network meter reader can be considered a degradation in the safety programs run by networks – both in terms of network assets (the meters) and customer installations (corrosion / damaged). This also includes a potential lessening in mitigation for meter and inlet piple tampering. Annual Visit As part of this program, we believe that this leads to a greater need to ensure that there is a regular visit by the network (annual or biannual) to the site. General Comment AGL believes that there is merit in developing this further, but there are a number of implications which require further clarity. AGL would suggest that some industry workshops be held to work through some of this detail (in a similar fashion to the missing meter workshops) so that industry can examine this proposal in more detail and work through the various issues with JGN. Procedure Amendments At this stage, we're not commenting on specific proposed changes to procedures for the implementation of CoRs. AGL does note that it has requested minor changes to the obligation to provide CoRs to Networks in all jurisdictions to align that obligation with requests from Networks receiving CoRs.