

**Table 1 – Retail Electricity Market Procedures: Glossary and Framework**

In the submissions, AEMO acknowledges that a number of comments were made about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table below.

ITEM	RESPONDENT	CLAUSE	HEADING/DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
1.	Aurora Energy		General Comment	All acronyms should be included along with a valid definition i.e. MTRD, SORD, CUST, SITE, OWNP	Agreed, but none of the examples listed fit within the context of this consultation.
2.				It is noted that in the Glossary there are several Terms that show an Acronym – however in the definition it only explains the abbreviation not an actual definition of the meaning – I have included a small number under the Glossary as an example	The Glossary is a tool that identifies the meaning of special terms and acronyms.
3.				Figure 1 High Level View of Retail Electricity Market Processes – the picture at the bottom of the figure needs to be made clearer	We will enlarge the image in an attempt to make it clearer.
4.	AGL	1.2	Definitions and Interpretation	AGL queries the benefit of the amendment where a defined term used in one procedure is only defined in that procedure. The whole point of the glossary was to consolidate terms to either the Rules or glossary. There is a small risk that a singly defined term might be re-used in another procedure leading to varying definitions, which is what is being avoided. AGL suggests that any defined term (whether used in multiple procedures or a single procedure) be included in the Glossary.	As noted, there is a small risk of singly-defined terms being used elsewhere, but if such an error is spotted, we will correct it.
5.	Jemena			Connection Point definition required	The term is defined in the NER.
6.	AGL	2.1	The Role of the Retail Market in the NEM	Temporal reference to roles In B2B the term for a new/incoming retailer is 'Prospective Retailer' and that term is used extensively within those documents. Suggest that the final sentence be amended to ... is referred to as 'New' or 'Prospective'.	The use of 'New' is consistent with the MSATS procedures, and this section is related to the MSATS procedures, please raise this issue in the B2B consultation.
7.	ActewAGL	2.3	Metrology Procedure	In some sections e.g. 2.5.5 the word 'published' is not in italics and in other sections it is – If it is meant to be a definition then it should be included in that section and formatted accordingly. Otherwise it should be in normal text.. Italics for published is unnecessary. The words 'Unmetered Load Guideline' should be in italics as it is a referenced document. Examples: 2.3 The metrology procedure is made in accordance with clauses 7.16.3, 7.16.4 and 7.16.5 of the NER and it is <i>published</i> in two parts 2.3.2 The document is <i>published</i> separately as the Unmetered Load Guideline and is not subject to consultation under the NER. Difficult to understand paragraph in 2.3.2 One of the matters contemplated by Metrology Procedure: Part B is the process by which the Load Table might be updated. This essentially covers the inclusion of Unmetered Devices, predominantly street lighting, for the purposes of accounting for their electricity consumption in the calculation of the quantity of electricity used by End Users.	Agreed. They should all be italicised in section 2.  'Unmetered Load Guideline' should not be italicised, but it is a defined term so it is capitalised.  The first paragraph in section 2.3.2 has been amended to make it clearer.
8.				2.4	B2B Procedures
9.		2.11	MSATS Codes	The term 'ENM' is used in the Retail Electricity Market Procedures to identify the <i>Embedded Network Manager</i> . There is no 'ENM' code in MSATS.  <b>2.11.2 Use of LNSP to refer to ENM</b>	Agreed.

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				The acronym 'LNSP' is used as defined in section 3 and as a code in MSATS to refer to the defined term.  In most cases where the MSATS code 'LNSP' is used it means the LNSP as defined in section 3, however, where it is used in the context of an <i>embedded network</i> , the same code will be used to refer to relevant ENM.	
10.	ActewAGL	3.	Glossary – Category A	If this definition is correct, no individual business can independently seek accreditation to install only, after 1 Dec 17.	Agreed.
11.			Glossary – Current	Section 4.3 of what?	It should read 'section 3.3'.
12.			Glossary – New	Section 4.3 of what?	It should read 'section 3.3'.
13.	Aurora Energy	3	Glossary	Backup RoLR If using a guideline as a definition add the link to the guideline and preferably the page reference, as this is not really a definition.	AEMO's drafting philosophy is not to repeat content from other statutory instruments, such as the AER guidelines. Hyperlinks can be broken and providing links to websites AEMO does not control means that AEMO will have no way of knowing when this is likely to occur.
14.				BMP There seems to be a lot of acronyms that only confuse the definition and this does not really work as a definition.	The term has been redefined.
15.				Business - Can a link to the NERL be added for easy reference to the document?	Please refer to internet for this legislation.
16.				Business Hour - Why use Business Hour and not Business Hours which is referred to substantially more through various AEMO documents	Because the singular means the plural and vice versa. See Schedule 2 of the NEL.
17.				Cooling-Off Period - Should read "As defined in the NERR.  Apart from In Victoria: As defined in the Energy Retail Code published by the Essential Services Commission of Victoria".  The majority should come first and as Victoria is the anomaly it should be next. Also If using a document as a definition add the link to the document, as well as the page reference as this is not a really a definition.	Definition has been clarified.
18.				CT, DLF, DNSP, ENM, HV CT, LR, MDP, MSGA, NSP, TI, TNSP, VT  This is not a definition – there needs to be more detail as it only explains what the acronym is.	These acronyms draw their meaning from the NER. AEMO's drafting philosophy is not to repeat NER content, or the content from other statutory instruments.
19.				Current [Participant/Role] - This is not a definition	AEMO's drafting philosophy is not to repeat content from another part of the same document. The pointer to another section of the same document fulfils the necessary function of the Glossary.
20.				Customer Classification Code - Add a link to the document and page	Section 1.3 provides links to every related AEMO document.
21.				Data Delivery Calendar - This is not a definition it needs more detail	As noted in the draft determination, a description of the documents referred to in this procedure is contained in section 2. This was absent for the Data Delivery Calendar, which has been rectified.
22.				Estimated Reading - This indicates a substitute read as well and is not clear enough to define between the two and when they are used. Perhaps consider - Estimations apply to a period that has an end date/time in the future. As per metrology part B	Amended for clarity.
23.				Explicit Informed Consent - Should Read "As defined in the NERL. Except in Victoria: As defined in the Energy Retail Code published by the Essential Services Commission of Victoria.  The majority should come first and as Victoria is the anomaly it should be next. Also If using a document as a definition add the link to the document, as well as the page reference as this is not a really a definition.	Definition has been clarified.
24.				FRMP - Needs Capitalisation in Financially Responsible and Retailer	These are NER-defined terms, hence capitalisation is not required. See Chapter 10 of the NER.
25.				Jurisdiction - This is not a definition – there needs to be more detail	The term is given its meaning, which is drawn from the NER. AEMO's drafting philosophy is not to repeat NER content.
26.				Life Support - Should read "A situation where an End User relies on electricity for the operation of 'life support equipment', a term defined in:  In the NERR; and  Victoria, in the Electricity Distribution Code.  The majority should come first and as Victoria is the anomaly it should be next. Also If using a document as a definition add the link to the document, as well as the page reference as this is not a really a definition	Definition has been clarified.
27.				MAMP This is not a definition – there needs to be more detail as it only explains what the acronym is	More information provided for clarity.

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28.				MDFP Specification - This is not a definition – there needs to be more detail and	This is a definition. A description is included in section 2.7.1. Section 1.3 provides links to every related AEMO document.
29.				MDM & MSATS - This is not a definition – there needs to be more detail and add a link to the Document	This is a definition. AEMO does not believe that further detail will add meaning to the acronym. Section 1.3 provides links to every related AEMO document.
30.				Meter Register Status Code - Please add link to section 4.11.3 of the CATS Procedures	Section 1.3 provides links to every related AEMO document.
31.				Metering Installation Type Code - Please add link to section 4.12 of the CATS Procedures.	Section 1.3 provides links to every related AEMO document.
32.				MPB & MPC - This is not a definition – there needs to be more detail	More information provided for clarity.
33.				NEM Retail Operations Contacts List - This is not a definition – there needs to be more detail. Add the link	Once the document is on the website, a link will be provided.
34.				NER - This is not a definition – there needs to be more detail. Add the link	AEMO believes the definition provided is sufficiently detailed for its purpose.
35.				New [Participant/Role] - This is not a definition – there needs to be more detail and should say “of this Document” as there no indication that it is this document	AEMO’s drafting philosophy is not to repeat content from another part of the same document.
36.				NMI Discovery Search 1, NMI Discovery Search 2, NMI Discovery Search 3 - These have incorrect references to sections Should be 43.3,43.4 & 43.6	Agreed.
37.				NMI Search Rules Should be Table 43-B	Agreed.
38.				NMI Standing Data Schedule - This is not a definition – there needs to be more detail. Add link to document	This is a definition. Section 1.3 provides links to every related AEMO document.
39.				Non-Controlled Load - This is not a definition – there needs to be more detail	This is a definition. AEMO does not believe that further detail will add meaning to the term.
40.				Read Type - please add link to document	Section 1.3 provides links to every related AEMO document.
41.				Register Identifier Status Code - Please add link to document	Section 1.3 provides links to every related AEMO document.
42.				Regulator - Should read - In the context of a RoLR Event, the AER and the Essential Services Commission of Victoria (for Victoria)	Definition has been clarified.
43.				Residential This is not a definition – there needs to be more detail. Add the link to the document	This is a definition.. Please refer to obligations arising out of energy legislation.
44.				Retail Electricity Market Procedures - Should read “See the description in section 2.2. of this document”	This is assumed.
45.				There is no definition of Retailer and this is used throughout many AEMO documents	This is a term defined in the NER, so it is italicised and not capitalised.
46.				There is no Term or definition for RoLR but RoLR is mention in other forms i.e. RoLR Event	This is a term defined in the NER, so it is italicised.
47.				SCADA - This is not a definition – there needs to be more detail as it only explains what the acronym is	This is a definition. AEMO does not believe that further detail will add meaning to the acronym.
48.				Transaction Type Code - This is not a definition – there needs to be more detail and needs an example i.e. 2001/ 3001	We have added some additional material to make it consistent with similar terms of.
49.				WIGS - This is not a definition – there needs to be more detail as it only explains what the acronym is	This is a definition. AEMO does not believe that further detail will add meaning to the acronym.
50.	Ergon Energy Network			The term: EENSP: Exempt Embedded Network Service Provider  For clarity, this should include a reference to the fact this is (for all intents and purposes) the same role as an Embedded Network Operator, as noted in the <i>Guide to Embedded Networks</i> , and shown below:  <b>3.4. Embedded Network Operator</b>  Embedded Network Operator is a term that is being used by the AER, it is not a term that AEMO uses, however for all intents and purposes the Embedded Network Operator will be an EENSP.	Agreed.
51.	United Energy			United Energy welcomes the amendment of the MDM Contributory Suffix definition.  Glossary Term: MDM Contributory Suffix  <i>‘A suffix defined in sections 6 and 7 of the NMI Procedure used to identify a stream of metering data and is consistent with the ‘NMISuffix’ contained in the 200 record of the MDFP interval metering data file.’</i>	Noted.

**Table 2 – Default & Deregistration Procedure (MP, MDP, ENM, MC)**

In the submissions, AEMO acknowledges that a number of comments were made about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table below.

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1.	AGL			While this procedure may not seem overly complicated, the lack of logical progression and process flow will make the operationalisation of this process complicated and prone to misapplication by AEMO operational staff.	The procedure follows the requirements of the Rules. AEMO disagrees that there is a lack of logical progression.
2.	Simply Energy	N/A	General Comment	<p>Metering Coordinator Default Notice:</p> <p>Nothing has been leveraged from RoLR process that could be highly beneficial for the industry when participants will be impacted as a result of the above MC default event. Whilst we understand RoLR and MC Default Event are two separate processes, in reality, there are a number of processes that can be used during a MC Default Event, (e.g. CATS transactions, AEMO's Bulk Change Tool, etc) that are used in RoLR Procedures.</p> <p>AEMO's obligation as a Market Operator is to ensure market is operating without any disruptions, especially from a consumers' perspective and hence by mere publishing default event notices to impacted parties is not a very useful solution. Would AEMO's systems be available during MC default event? If not, what is AEMO's view on the management of end to end process? Simply Energy would appreciate any views.</p> <p>AEMO's response: AEMO agrees that procedures may not cater for sudden mass change following the de-registration of an MC, MP or MDP. AEMO will consider whether this proposal can be considered as part of Package 3</p> <p>Simply Energy's response: Simply Energy strongly recommends this to be considered or at least flagged in some sort of "opportunities register" for future changes associated with PoC.</p>	Noted.
3.	Simply Energy			<p>Simply Energy's response:</p> <p>We support the restructured Notice of Breach and would be supportive of restricting other forms in a similar way.</p>	Noted.
4.	AusNet Services	1.1	Purpose and Scope	AusNet Services recommends that it should be clear that Default and Deregistration Procedure applies from 1 Dec 2017 and the old Compliance, Assessment and Deregistration Procedures no longer apply from 1 Dec 2017.	Agreed.
5.	Endeavour	1.2	Definitions and Interpretation	Procedural improvement: There are a number of terms that are defined within this document instead of the Glossary and Framework document. For ease of referencing we would suggest that these defined terms be documented in a table in this section. If this is not accepted then we would suggest that AEMO explain that words in bold within brackets are a defined term.	Noted – however, this is a short procedure.
6.	Red Energy Lumo Energy	2	Breach of the NER or Procedures under the NER	<p>Red Energy and Lumo Energy recommend that the clause is redrafted as the additional information in this clause is not required. Should AEMO decide to retain the wording, it is recommended that this should be without limitation.</p> <p>Proposed wording:</p> <p>The failure of an MP, MDP, ENM or MC to comply with the NER or any applicable procedures under the NER, or a failure to meet a condition of accreditation, (Breach) that may come to AEMO's attention following compliance audits of MPs, MDPs, ENMs or MCs compliance, information in AEMO systems and records, complaints from affected Participants or End Users, notifications from other regulatory bodies or through self-reporting.</p>	The provision has been re-drafted to clarify that there is no limitation.
7.	United Energy	3	Default Process	In AEMO responses, item 10, AEMO note that the old services provider: Compliance, Assessment and Deregistration Procedures will fall away and this new procedure takes over from 1 Dec 2017. It would be useful if the old procedure remained on AEMO website clearly specifying that it has an end date of 30 Nov 17 and the new document takes over from 1 Dec 2017. Similarly with the EN Guideline and a number of other documents and guides that are being updated. Where the new documents are a different name it can often be difficult to work out that the previous documents have actually been made redundant or repealed. It would be useful if this history was maintained on the AEMO website in a manner that made it clear.	Agreed.
8.	AGL	3.1	Issue of Breach Notice	<p>AEMO in the Draft determination state in 4.3.4:</p> <p>"AEMO will not be developing a breach classification framework of the type suggested in submissions as it considers that the framework proposed provides sufficient flexibility for AEMO to address Breaches</p>	AEMO does not agree that there is a need to set up a sub-committee for this purpose as AEMO's internal operational processes are already subject to regular audits by independent auditors.

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				<p>on a case-by-case basis and by taking into account prior Breaches, regardless of whether they arise under similar circumstances.”</p> <p>AGL’s and many submissions sought more detail, clarity and consistency on the methodology for assigning breach severity.</p> <p>AEMO’s response regarding flexibility appears to be creating the issue for participants as it may be open to inconsistent application or misuse. Clear governance in the application of this process is critical within the energy industry.</p> <p>UE suggest that any issue/breach be reviewed by an AEMO Board sub-committee (e.g. the Risk Committee) and subject to market audit review so that breaches are managed in a consistent manner amongst participants and are consistently managed over time.</p> <p>Where the severity of the breach is not subject to the discretion of just one person, this should allay some of the issues regarding consistency, preferential relationships etc.</p>	
9.	AusNet Services			<p>AusNet Services notes the previous submissions by a number of Participants requesting a breach classification framework and AEMO’s response that it provides sufficient flexibility to address breaches on a case-by-case basis.</p> <p>It is to this very point of flexibility that creates unnecessary risk for Registered Participants. To resolve this uncertainty we recommend adding a statement that AEMO’s assessment is auditable and subject to regular audits and quality reviews. Given AEMO’s powers under the 7.4 of the NER this proportionately reflects the materiel impact of a deregistration or a breach would have on a business.</p>	
10.	United Energy			<p>AEMO in the Draft determination state in 4.3.4:</p> <p>“AEMO will not be developing a breach classification framework of the type suggested in submissions as it considers that the framework proposed provides sufficient flexibility for AEMO to address Breaches on a case-by-case basis and by taking into account prior Breaches, regardless of whether they arise under similar circumstances.”</p> <p>UE note that many of the submissions sought more detail and clarity on the assessment of an issue into a breach classification in the framework and AEMO has responded that they wish to have flexibility. It is this very issue of flexibility which appears to be creating an issue and may be open to inconsistent application or misuse. UE suggest that any issue/breach be reviewed by a committee within AEMO so that breaches are managed in a consistent manner amongst participants and are consistently managed over time. Where the severity of the breach is not subject to the discretion of just one person, this should allay some of the issues regarding consistency, preferential relationships etc.</p>	
11.	ActewAGL			<p>Reword second paragraph as not well worded under 3.2</p> <p>Suggestion: AEMO may take the matters described in section 3.2 into consideration when conducting the Review.</p>	Agreed.
12.	AGL	3.2	Review of Capability for Ongoing Compliance	<p>This clause specifically requires the breach to be rectified within 7 days after the breach notice is issued, but the next sub clause (3.2.1) recognises the provision of a remediation plan – which may specify more than 7 days to rectify.</p> <p>Clause 2 specifically recognises that a breach may be self-reported. It is expected that a remediation plan may be provided with that self-reporting.</p> <p>Clauses 3.1 and 3.2 do not flow logically, nor do they accommodate the steps which would be expected to take place.</p> <p>As this is a procedure and not a policy it is expected that the various steps each party would be required to take would follow a logical process; i.e.</p> <ul style="list-style-type: none"> <li>• Breach is identified – either from review etc. or by self-reporting</li> <li>• Participant contacted for details and remediation plan</li> <li>• Breach is assessed for severity – may include various steps – e.g. organisational review</li> <li>• Breach Notice is issued</li> <li>• Remediation plan is monitored or</li> <li>• If remediation plan completed – breach notice is closed</li> <li>• if remediation is not taking place – warning / default notice is issued (depending on severity of breach)</li> </ul>	<p>AEMO disagrees with this comment.</p> <p>Section 3.2 is about the Review that AEMO is required to conduct under clause 7.4.4(c)(2) of the NER, or clause 7.7.3(c)(2) if the Breach is not remedied within 7 days.</p> <p>The flow between 3.1 &amp; 3.2 follows the requirements of the Rules. Section 3.1 is about the Issue of a Breach Notice. Section 3.2 is about the activities that follow the Breach Notice if the Breach is not remedied within 7 days.</p> <p>Please see Draft Determination – Table 2 – Comment #3.</p>
13.	Endeavour			<p>Procedural improvement: The term Breach is a defined term and should be used consistently. We suggest that clause 3.2 be reworded to:</p>	Agreed.

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				"If an MP, MDP, ENM or MC has not remedied the Breach referred to in the Notice of Breach within 7 days after the issue of the notice, AEMO will conduct a review to assess the relevant MP, MDP, ENM or MC's capability for ongoing compliance with the NER or applicable procedures under the NER as required by clause 7.4.4(c)(2) of the NER, or clause 7.7.3(c)(2) (Review)."	
14.	Ergon Energy			In regards to: 3.2.2 Past Conduct Aemo may review the past conduct of the relevant MP,MDP,ENM or MC, including as specified in (a)-(e). Ergon Energy recommends that (c), includes: (c) the level of any previous warning issued to the relevant MP, MDP, ENM or MC, and how this warning was responded to. - as the participant's response to any previous warning should be a consideration of 'Past Conduct'; when reviewing capability for on-going compliance.	Agreed.
15.	Red Energy Lumo Energy			In relation to 3.2: Red Energy and Lumo Energy would like to see AEMO retain the ability to review a MP, MDP, ENM or MC irrespective of whether they have remedied a breach notice. We recommend the redrafting of this clause to read: (a) If an MP, MDP, ENM or MC must has not remedied the breach referred to in the Notice of Breach within 7 days after the issue of the notice. (b) AEMO must will conduct a review to assess the relevant MP, MDP, ENM or MC's capability for ongoing compliance with the NER or applicable procedures under the NER as required by clause 7.4.4(c)(2) of the NER, or clause 7.7.3(c)(2) (Review) where the breach has not been remedied. (c) AEMO may conduct a Review where the breach has been remedied.	AEMO will need to verify whether a Breach has, in fact, been remedied before concluding whether it has been remedied within the required period of time.  The Review (which is what the NER requires) applies where the Breach has not been remedied within the required period of time.  If Red/Lumo has concerns even after a Breach has been remedied, they can take the matter up with AEMO, or the AER, if appropriate.
16.	Active Stream			'If an MP, MDP, ENM or MC in receipt of a Notice of Breach provides AEMO with a remediation plan...' Clarification is sought if a remediation plan is a requirement for AEMO's review post the 7 day period for rectification. If so, suggest rewording to make it a requirement.	There is no requirement for a remediation plan, but if one is provided, AEMO may take it into consideration. That is how it is drafted.
17.	EnergyAustralia	3.2.1	Remediation Plan	Please refer to the suggested edits to this section that ensure this section reflects the scope of a remediation plan. Thought about how participants prevent reoccurrence of breaches should be considered as part of the remediation plan. The current wording suggests that only backlog or currently impacted parties are covered. Parties in breach should also be thinking and planning how they will prevent the breach from occurring again. If an MP, MDP, ENM or MC in receipt of a Notice of Breach provides AEMO with a remediation plan regarding the Breach, AEMO may take the remediation plan into account, provided that the remediation plan includes, as a minimum: (a) a demonstrated understanding of the Breach and its impact on AEMO, other Participants and/or End Users; (b) a demonstrated understanding of the cause/s of the Breach; (c) the actions, projected timeline (including remediation profile where relevant), resources and systems required to remediate the Breach (i.e. plan for current impacted parties, and plan to prevent reoccurrence); (X) identified controls to prevent reoccurrence of breach (d) communications and co-ordination with affected Participants where remediation activities require it; (e) a commitment to remediate the Breach by a specified date; (f) actions, resources or systems that have been, or are to be, deployed to mitigate the effects of the Breach prior to its remediation; and	Noted, however the requirement to have controls in place to prevent reoccurrence of breach is already addressed in section 3.2.3.

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				(g) regular reporting to, and meetings with, AEMO detailing progress of the remediation activities. The reporting and meeting frequency must be agreed by AEMO.	
18.	Active Stream	3.2.4	Other Relevant Considerations	Formatting: Suggest aligning the format of this sub clause to mirror the previous sub – clauses i.e. Clause Numbering	Agreed.
19.	Red Energy Lumo Energy			In relation to 3.2.4: Red Energy and Lumo Energy disagree with the level of cooperation and assistance being provided to AEMO being a factor of consideration. Whilst we agree with the intent that AEMO would like parties to be cooperative and provide assistance, it is inappropriate for consideration to be placed on the level of assistance. The Review and the Breach should be assessed against the type of breach, its impact on the market, not against how cooperative the party is. Proposed redrafting: AEMO may take any other relevant matters into consideration, such as whether the Breach was reported by the relevant MP, MDP, ENM or MC who committed the Breach, the extent to which another Participant or other person might have contributed to the Breach, the conduct of the relevant MP, MDP, ENM or MC after receiving the Notice of Breach, including the level of co-operation and assistance provided to AEMO during its Review.	AEMO considers the conduct of the party in breach to be very relevant.  See also comment #14.
20.	ActewAGL	3.3	Determination of Type of Breach	Reword second paragraph as not well worded under 3.3 Suggestion: There are three Breach types listed in section 3.3.	Agreed.
21.	AGL			In respect of item (e) unethical behaviour – this clause should be deleted. It is not appropriate for AEMO to attempt to pass judgement on whether or not a Participants' behaviours are ethical or unethical. The question of ethical or unethical is a matter which belongs in an appropriate regulatory environment. AEMO is entitled to provide professional judgement in respect of various AEMO procedures but that is as far as it goes. AEMO is a market operator and not a regulator and therefore cannot and should not attempt to take a position in this respect.	On further reflection, AEMO has determined not to include the reference to unethical behaviour in the definition of a Material Breach on the basis that the service provider's conduct is a relevant consideration in any event.
22.	AusNet Services			Previously AusNet Services noted that condition 3.3(d) is unclear and should be removed. The Procedure refers to what AEMO reasonably considers unethical, but does not specify what ethical framework that AEMO might apply. It seems a participant can be compliant under the Rules and be in a Material Breach just because AEMO reasonably considers it being "unethical". Further to this point, it is all the more important because the NER in section 7.4 gives AEMO discretion in making the Breach assessment. Clause 3.3(d) gives AEMO too much discretion. It is the role of the Rules and Procedures to provide certainty to what is acceptable and not AEMO's ethical framework. AEMO's response asked for examples. 1. Scenario #1. Metering contestability results in lots of meters being disposed of. The society of the day sees the early disposal of long life assets as ethically wrong and AEMO starts breaching metering providers for not re-using assets. 2. Scenario #2. MDPs start offering services to provide more preferential substitution rules to the customer if the customer pays more for the service. These MDPs may have invested substantially in building this capability. Although the MDP has not broken any Rules or Procedures, and Market Settlements are by the different estimation process, competitors who are not doing the same practice may argue this is not within the spirit of the Rules, and AEMO's ethical framework may be sympathetic to their plight, until the public starts supporting this practice (similar to when Uber started competing with Taxis). We suggest changing these words to conduct associated with illegal activity or put the safety of the community at risk. This would strike the right balance and protect customers from MDPs from sharing metering data with house burglars and from unsafe metering maintenance without making an ethical judgement.	
23.	Jemena			What is the definition of "unethical" in terms of a material breach?	
24.	Endeavour			Procedural improvement: The term Breach is a defined term and should be used consistently without having to try to redefine it within a sentence. We suggest that clause 3.3.3.b be reworded to:	The use of the term 'breach' in paragraphs (b) & (c) of 3.3.3 in an uncapitalised format is correct.

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ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
				<p>“a Breach that has resulted in the MP, MDP, ENM or MC incurring civil penalties or other sanction under the NEL;”</p> <p>Procedural improvement: The term Breach is a defined term and should be used consistently. The term jurisdictional is not a defined term therefore should not be capitalised. We suggest that clause 3.3.3.c be reworded to:</p> <p>“a Breach of a jurisdictional requirement in the metrology procedure;”</p>	
25.	Ergon Energy			<p>Throughout section 3.3 there are references to the severity of a breach being determined by its impact on “Participants ability to perform their services, conduct their business operations, or fulfil their regulatory obligations”. Ergon Energy recommends this should include references to ‘End Use Customers’ in addition to ‘Participants’ “ability to perform their services ...” so as to incorporate potential breaches by Embedded Network Managers (ENM).</p>	AEMO believes the current drafting is appropriate as the End User cannot be affected without the participant related to the End User being affected.
26.	Red Energy Lumo Energy			<p>In relation to 3.3.3(b), Red Energy and Lumo Energy recommend a small amendment in relation to a material breach, as it civil penalty processes may or may not have been completed at the time in which the material breach is identified.</p> <p>Proposed redrafting:</p> <p>(b) a breach of the NER or procedures under the NER that may have resulted in the MP, MDP, ENM or MC incurring civil penalties or other sanction under the NEL;</p>	<p>It is necessary for the penalty to have been imposed because it is possible for a Participant to be found not guilty.</p> <p>AEMO considers that (a), (c) and (d) should sufficiently provide for an assessment of a breach that ‘may’ lead to a penalty or other sanction, that comes to AEMO’s attention.</p>
27.	Active Stream	3.3.1	Immaterial Breach	<p>‘An Immaterial Breach is a Breach that does not have a material adverse effect on either or both of the following:’</p> <p>Suggest rewording for simplicity:</p> <p>‘An Immaterial Breach is a Breach that does not have a material adverse effect on any of the following:’</p>	The suggested change is a drafting preference. AEMO has maintained the previous drafting because it has been updated previously to make it clearer and reflect previous participants feedback.
28.	Active Stream	3.3.2	Significant Breach	<p>‘A Significant Breach includes a Breach, or a series of Breaches taken together, that if not remedied, is, or are, likely to have a material adverse effect on either or both of the following:’</p> <p>Suggest rewording for simplicity:</p> <p>‘A Significant Breach includes a Breach, or a series of Breaches taken together, that if not remedied, is, or are, likely to have a material adverse effect on any of the following:’</p>	
29.	Active Stream	3.3.3 (a)	Material Breach	<p>‘A Breach, or a series of Breaches taken together, that has, or have, a material adverse effect on either or both of the following:’</p> <p>Suggest rewording for simplicity:</p> <p>‘A Breach, or a series of Breaches taken together, that has, or have, a material adverse effect on any of the following:’</p>	
30.	AGL	3.4	AEMO action following Review	<p>This clause seems to more correctly follow clause 3.2 and could be relocated</p>	We have amended the introductory words of section 3.3 to make it clear that AEMO must also determine the type of Breach before it can determine what type of action is appropriate.
31.	Endeavour			<p>Procedural improvement: The options available to AEMO should include a combination of subparagraph i, ii and iii. We suggest that clause 3.4.1.a.iv be reworded to:</p> <p>“any combination of the above.”</p>	Agreed.
32.	Aurora	3.4.3	Warnings	<p>The level of warning may be taken into consideration during a Review of a subsequent Breach by the same Participant.</p> <p>Aurora Energy Comment: Does the word review need capitals?</p>	Yes, it is a defined term.
33.	Active Stream	4.2 (b)	Constraints	<p>Suggest the removal of the examples in the parenthesis, especially the second one and leaving the description of the constraint.</p> <p>If a participant is restricted in reading their multi- datastream meters especially those that are remote communications enabled, this would have impacts to other participants also from a billing/revenue/settlements perspective</p>	<p>The examples are retained to provide an indication of the types of restrictions that could apply.</p> <p>When a Material Breach occurs AEMO sends an Outcome of Review notice to the MP, MDP or ENM that includes details of any constraints that have been placed on the party in breach. AEMO also sends a Notice to Affected Parties (i.e. MC, FRMP, LNSP or EENSP) that includes details of any constraints that have been placed on the party in breach. Refer to 5.1.1, Appendix D and Appendix E of the Default and Deregistration Procedure.</p>
34.	AGL	4.2	Constraints	<p>AGL questions the constraints that AEMO has indicated that it would attempt to impose on a participant.</p> <p>Constraint (a) noted – assuming that limiting volume limits risk to the market;</p>	



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				Constraint (b) – poor example – if AEMO were to limit an MDP from reading metering installations with multiple data streams then there is likely to be a substantial impact on other participants and the market. Suggest this example is removed. Constraint (c) noted Constraint (d) noted.	If a service provider is given notice that its activities are constrained, it, therefore, is incumbent on the party responsible for engaging the service provider to find an alternative service provider to provide services that are the subject of constraint.
35.	Red Energy Lumo Energy		Red Energy and Lumo Energy would like AEMO's proposed limitation to be based on the type of customer or meter. Placing constraints which are only identifiable once the meter provider is at the site does not lead to a positive customer experience or outcome.  Proposed redrafting:  (b) limiting the types of activities that can be undertaken under an accreditation category (such as not being able to install CT metering only being able to install single phase metering rather than three-phase, or only being able to read metering installations that have a single Datastream);		
36.	Energy Australia		In respect to item b, if AEMO were to limit an MDP from reading metering installations, this could have substantial impact on other participants and the market. This example should be removed.  Other than that, this section is fine.		
37.	Simply Energy	5	Review of Capability for Ongoing Compliance	Also, there must be some sort of discretion around different SLAs for non-material and material breaches in particular with rectification of mass market and large customers. Further, if the breach requires access to customer metering installations there may be a requirement for outage notifications to be issued to customers which require 4 business days' notice to the customer. AEMO's response: AEMO cannot respond to this submission without details of the proposal. Simply Energy's response: Simply Energy's point was to define SLAs at various levels instead of a fixed 5 business day SLA.	AEMO does not consider SLAs to be appropriate in this procedure.  AEMO will review the circumstances of each Breach and exercise its discretion to determine what action the service provider in breach must take following the Review and how soon that action will need to be completed by.
38.	AGL	5.1	MP, MDP or ENM	CI 5.1.1(c) AGL notes that within the list of affected parties the Local Retailer is not considered. This impacts both DNSP local retailers and EN local Retailers. AGL would like to see the Notice to affected parties include the LR as they are a financially impacted by a metering issue.	Agreed. LRs have been added as affected parties to be notified.
39.	Aurora		Notice to Affected Parties	The LR would also be considered an affected party if the breach was against MP/MDP so needs to be included here	
40.	AusNet Services		MP, MDP or ENM	AusNet Services notes that AEMO had agreed that the impacted LNSP would be a notified party of a breach. However, that is only after AEMO makes a determination do the impacted parties get notified. This could take too long.  As such, we recommend adding a provision that states where AEMO will notify impacted parties when AEMO reasonably considers that the impacted parties have not been notified within 10 businesses by the party in breach.	AEMO considers the notification format prescribed in Appendix E and the requirement of the remediation plan provide adequate notice to affected parties.
41.	Ergon Energy		MP, MDP or ENM	5.1.1 (c) Ergon Energy considers that End Use Customers should also be notified of any material breach outcome against an ENM.	AEMO disagrees, communications with the End Users are a matter for the FRMP and the FRMP is provided with a notice under 5.1.1(c).
42.	Simply Energy		Remediation Plan	AEMO to notify contracted parties as well (as per current MSATS roles), in addition to the ones listed in the Procedure. Include LR as well, there might be a case when tier 2 retailers managing an Embedded network are appointed as LR for child NMLs, and hence LR should also be included in the list of notified parties. Contracted and impacted parties (i.e. MC, retailer, network ENO etc) should be aware and agree any remediation plan as they may have to assist the affected parties (e.g. customer de-energisations to undertake physical work, customer notices for rebilling etc.) and be a party to the remediation reporting. AEMO's response: While AEMO sees merit in requiring the participant in Breach to: <ul style="list-style-type: none"> <li>consult with other affected participants when developing its remediation plan; and</li> <li>keep affected participants informed of progress against an approved remediation plan, that would be as far as it should go.</li> </ul> It is not appropriate for AEMO to fetter its discretion by seeking the agreement of affected participants to any proposed remediation plan. Simply Energy's response: We agree with the above provided these two dot points are appropriately called out in the Procedure.	These requirements are included in section 3.2.1(d).

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ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
43.	United Energy		MP, MDP or ENM	<p>UE refers to item 67 where AEMO had agreed previously that the impacted LNSP would be a notified party of a breach. It appears now that the Notice of Breach (Appendix A) only goes to the party in alleged breach, AEMO undertake a review (presumably this is a desk based review of papers), AEMO make a determination and only then under 5.1.1 (c) does the impacted LNSP get notified.</p> <p>This could be a lengthy process depending on the nature of the breach and the remedial actions the party needs to undertake. UE sought to have included in the Notice to Participants and AEMO agreed:</p> <ul style="list-style-type: none"> <li>the substance of the breach (i.e. nature and extent e.g. which jurisdiction, how many customers etc. what the issue is/was), the NER clause or procedure clause that was breached ( e.g. was it failure to provide data or incorrect validations e.g. High meter reads coming through to us and being billed).</li> </ul> <p>These matters whilst agreed by AEMO to be include in Appendix E have not been. AEMO needs to amend the Appendix E notifications to better advise impacted participants what the issue was exactly and how extensive it is so we can consider what appropriate action we may need to take to limit impacts. UE remain concerned that the networks may be unaware of the issue or extent of the issue and if we are not seen as part of the breaching parties remediation plan.</p>	Agreed.
44.	AGL	5.2	MC	<p>Cl 5.2(b) – FRMP appointment of an MC are only under clause 7.7.1(a) and therefore clause (b) should also be under NER cl 7.7.1(a).</p> <p>Suggest (b) be written as: otherwise the FRMP must appoint the new MC under clause 7.7.1(a) of the NER.</p>	The submission ignores NER clause 7.7.1(b), which provides that the FRMP must appoint a new MC only if the non-FRMP appointment of an MC is terminated or expired and the non-FRMP appointer has not appointed a new MC within the period specified by AEMO in this procedure. That is what section 5.2(b) reflects.
45.	Energex Limited			(b) Further clarity is required to understand if this clause can be applied to large customers where they have been identified by AEMO.	Section 5.2(b) provides an alternative if the large customer fails to appoint a new MC. This is what NER clause 7.7.1(a)(2) requires.
46.	AGL & Active Stream			The procedure requires a letter to be sent – but does not make it clear who that letter should be addressed to.	Agreed. Procedure updated.
47.	Energy Australia			Please include in the process description , the contact at AEMO the de-registration letter should be sent to.	
48.	Simply Energy	6.2	Voluntary Deregistration Process	<p>AEMO must impose additional requirements/obligations on a deregistered MC and ENM, e.g., to provide relevant data to other parties similar to failed retailer obligations in RoLR.</p> <p>AEMO's response: AEMO will consider all impacts on the market before a de-registration is approved. However, AEMO has no power to impose requirements on de-registered service providers.</p> <p>Simply Energy's response: We understand that post de-registration, obligations will not be effective however there must be some data delivery obligations on failed Metering Service Provider similar to the obligations on failed retailer in the event of a RoLR prior to deregistration. At least in case of a RoLR, AEMO has all the relevant data however in case of an MC default event, the situation will be even worse for the market and highly disruptive for operation if a set data delivery criteria is not proceduralised.</p>	<p>AEMO does not see this as an issue:</p> <ul style="list-style-type: none"> <li>If an MC defaults, the market will continue to operate. The FRMP is required to appoint a new MC as soon as practicable after the default under NER clause 7.7.1. MSATS should be up to date. Bulk changes to the change of MC can be performed by AEMO following a request from affected FRMP under section 40 of the CATS Procedures.</li> <li>If an ENM defaults and is deregistered, AEMO has discretion to impose conditions on the provision of sufficient time until a new ENM is appointed. Bulk changes to MSATS can be made under section 40 of the CATS Procedures.</li> </ul>
49.	Simply Energy	Appendix A	Notice of Breach	The notices should also list who has received copies of the notice and should have a unique reference ID.	The Notice ID field has already been added to Appendix A. This notice is only intended to be sent to the party in breach so a list, as suggested, is not required.
50.	AGL	Appendix E.	Notice to Affected Parties	In reference to submission item 67 (Appendix A – Consolidated feedback) by UE, which AEMO agreed with, AGL notes that Appendix E does not seem to contain much information in regards to the breach which was the nature of UE's submission on this item.	Agreed.

### Table 3 – Exemption Procedure – Metering Installation Malfunctions

In the submissions, AEMO acknowledges that a number of comments were made about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table below.

ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
1.	AGL	2	Application process	<p>AGL notes the introductory statement but believes that an exemption can be issued to the MP as the rectification lies with the MP (see NER 7.8.10)</p> <p>The obligation to submit the application is mandated to be the 'current' MC. However, the rules do not state that the recipient of the application is the MC. That is a position that AEMO has chosen to take.</p> <p>The Rules do state (and therefore recognise) that the MP will provide the remediation plan and undertake the work for the rectification of the metering installation, and therefore it is an equally valid position that the exemption is applied to the MP.</p>	<p>The suggestion that the exemption can be issued to the MP is not correct.</p> <p>NER clause 7.8.10(a) states that, unless the exemption is obtained by the MC, the MC must cause repairs to be made. The obligation to effect the repairs sits with the MC, not the MP, and the right to seek exemption sits with the MC, as does the benefit of the exemption.</p> <p>The obligation to repair sits with the MC responsible for the connection point, i.e. the Current MC. The applicant has to be the Current MC and the beneficiary of the exemption.</p> <p>To do otherwise would defeat the purpose of the NER.</p> <p>The Current MC would remain in breach of NER clause 7.8.10 while it waited for the MP (who has no NER obligation to repair) to effect the repairs when the MP has no obligation to effect the repairs and would have been granted an exemption from an obligation that was not the MP's to begin with.</p>
2.	AGL			<p>AGL notes that an LNSP is exempt from the application process, but does not see any obligation within the procedure [noting the obligation within NER CI 11.86.7(g)(3)] for an LNSP to advise the relevant party (current retailer or customer) in a timely fashion that the meter is malfunctioning or has failed, so that the meter can be replaced as soon as practicable.</p> <p>It is suggested that the procedures reference the LNSP obligation under NER CI 11.86.7(g)(3).</p>	<p>The obligation on the LNSPs (as default MCs) to inform the FRMP of existing malfunctions is an obligation that exists under NER clause 11.86.7(g)(3) and has no place in this procedure as it is not required by NER clause 7.8.10(b).</p> <p>Similarly, the procedure does not attempt to address the obligation on MPs and MDPs to notify the MC of a malfunction under NER 7.8.10(d). That obligation does not form part of the procedures AEMO is required to have under NER clause 7.8.10(b).</p>
3.	Simply Energy	2.1	Applicant	<p>It is quite possible for an MC to be churned during an exemption rectification process and it seems inefficient to require a new MC to commence making an application for a known issue which has already been submitted (and likely approved) for consideration.</p> <p>Whilst SIMPLY ENERGY agrees that an MC needs to apply, however if an exemption is granted, it should be associated <u>with the metering installation</u> and not with MC.</p> <p>AEMO's response: The NER states that the application for the exemption must be made by the MC for a connection point. AEMO interprets this to be the Current MC. If AEMO grants the exemption, logically and legally, the only participant to whom exemption may be granted is the Current MC. AEMO recognises that the MP must provide the rectification plan after the grant of the exemption, but that in no way suggests that the appropriate participant to whom the exemption should be granted is anyone other than the Current MC. If the rule had intended for the exemption to be as fluid as suggested, the rule would have stated as much. If any participant thinks that the exemption should be granted to the MP/MDP, or any other participant for that matter, AEMO recommends that they submit a rule change proposal to the AER to that effect. That is not what the NER currently require or permit.</p>	<p>For the reasons stated in comment #1, AEMO does not agree that an exemption can be associated with the metering installation.</p> <p>The Procedure has been updated by including a new obligation in section 2.8 to require the Current MC to inform the New MC of the exemption where there is to be a change in the MC role.</p>
4.	Simply Energy			<p>Simply Energy's response: The change of MC (without a change of MP or metering installation) should not void the exemption. AEMO has mentioned that it has no power to transfer the exemption to anyone else, it's not been constrained by rules in any way (unless it's AEMO's interpretation). The process will be a lot cleaner this way, and easier to manage, else a change in retailer might result in a change in MC and provided the meter remains the same, every time an MC has to reapply for exemption which is quite an inefficient process.</p>	
5.	United Energy			<p>Refer to AEMO response pack item 6.</p> <p>UE appreciate the drafting that AEMO has added which clarify the arrangements under NER 11.86.7 which requires that regulated type 5/6 meters immediately before 1 Dec 2017 remain as type 5/6 meters after 1 Dec 2017, including the Victorian AMI meters. UE understand that the MC arrangements are expected to continue on and from 1 Dec 2017 with the expectation that these notifications in 11.86.7 to the FRMP are still required and the it is the new MC who will need to take the appropriate action under this procedure.</p> <p>UE support AEMO drafting: <i>A Current MC is not required to apply for an exemption in the circumstances contemplated by clause 11.86.7(g)(2) of the NER where it is the LNSP:</i> <i>(a) appointed as the Current MC under clause 11.86.7(a) of the NER; or</i> <i>(b) deemed to be appointed as the Current MC under clause 11.86.7(c) of the NER,</i></p>	Noted.

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ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
				<i>in respect of a type 5 or 6 metering installation.</i>	
6.	Active Stream	2.3	AEMO's Determination	<p>The exemption process has been revised from its initial draft. It appears it has been determined that 2 bus days is not sufficient for the exemptions to be processed and the timeframe has been amended to 5 bus days and noted.</p> <p>From an applicant's perspective propose the following:</p> <ul style="list-style-type: none"> <li>• Clause (d) be amended to 5 business days to align with the amendment made in the opening sentence of this section</li> </ul> <p>More importantly, clause (a) (b) and (c) which incorporate the 'front end receipting' of the exemption process be completed within 2 bus days from receipt of the application. This would provide a leaner process and enable the applicant follow up if a receipt has not been received or provide the additional information in a timely manner, instead of waiting for 5 bus days to trigger 2<sup>o</sup> processes.</p>	<p>The provision has been amended and now has two timeframes within which AEMO must first acknowledge the application and then make a determination on the application.</p>
7.	AGL			<p>The timings with this clause are inconsistent.</p> <p>The clause starts with 5 business days – but clause (d) specifies 2 business days.</p> <p>AGL also queries why it will take AEMO 5 business days to review an application for an exemption, given that Participants may only have 2 business days to identify an issue, develop a remediation plan (see Form A) and apply for an exemption.</p> <p>The additional delay in AEMO responding to a participant application could lead the participant to be non-compliant.</p> <p>AGL believes that AEMO should respond in two days.</p>	
8.	Energy Australia			<p>The clause indicates that AEMO has 5 business days to achieve items a) to d) however, (d) specifies 2 business days.</p> <p>Our view is that AEMO should respond within 2 business days. A more timely response will help prevent participants from being in breach of the NER.</p>	
9.	Endeavour Energy			<p>Procedural improvement: The leading in paragraph and clause 2.3.d contradict each other.</p> <p>We suggest rewording the leading in paragraph to:</p> <p>"AEMO must:"</p> <p>We suggest rewording clause 2.3.d to:</p> <p>"determine whether to approve the application and communicate that determination to the applicant by the end of the fifth business day from receipt of the application or the second business day from receipt of additional information requested (whichever is the later)."</p>	
10.	Red Energy Lumo Energy			<p>Red Energy and Lumo Energy recommend that if AEMO propose to take 5 business days to assess an application, then whether the wording in clause 2.3(d) should also be amended?</p>	
11.	Active Stream	2.4 (g)	Matters taken into Consideration	<p><i>'where provided, a draft of the MP's rectification plan;'</i></p> <p>Appendix A however has an important note stating that the application will be rejected if a draft of the MP's rectification plan is not provided.</p> <p>Clause 7.8.10 (c), however, states that an MP must provide a rectification plan <b>if</b> an exemption has been granted.</p> <p>From the above, suggest:</p> <p>Removing the rejection clause of the appendix A application form as it may not be possible to know a rectification plan at the time of applying for an exemption. In practicable terms, for most scenarios, the MP will not identify a metering malfunction until they visit the site and attempt to rectify the malfunction. Any secondary attempts of rectification, will require an exemption to ensure compliance to the NER and allow, if applicable, appropriate outage customer notifications. The rectification plan may not be available at the time the application is been submitted.</p>	<p>Agreed. The MP's rectification plan needs to be provided after the exemption has been granted, however, AEMO needs some assurance that the malfunction will be rectified if the exemption is granted, hence the provision of a draft at the application stage.</p> <p>The "Important Note" in Appendix A has been removed.</p>
12.	AGL	2.4	Matters taken into Consideration	<p>Clause (g) indicates that a rectification plan <b>may</b> be provided.</p> <p>Appendix A indicates than an exemption will <b>not</b> be granted without a draft rectification plan.</p>	

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				This is inconsistent with NER Cl 7.8.10 (c) and with the main body of the procedure (multiple clauses) and does not seem appropriate as the requirements to affect rectification may not be known until site visits have been programmed and the specific issues identified. Suggest delete the <b>Important Note</b> in Appendix A	
13.	Endeavour Energy			Procedural improvement: AEMO has made the draft MP's rectification plan mandatory with every exemption application. For avoidance of any confusion we suggest rewording clause 2.4.g to: "a draft of the MP's rectification plan; and"	
14.	Red Energy Lumo Energy			Red Energy and Lumo Energy highlight the inconsistency between 2.4(g) and the important note in Appendix A. We recommend that the 'where provided' is removed from clause 2.4(g) if AEMO will reject an application that does not have a draft MP rectification plan.	
15.	Energex			(c) In regard to review comment 28 of the combined feedback to this document, Energex believes that this section does not cover the scenario where a declared natural disaster has occurred and the MC is unable to rectify en masse malfunctions within the specified timeframe. Energex considers that another section should be added for declared natural disasters.	As stated in the draft determination, AEMO does not believe that a natural disaster necessarily leads to a metering installation malfunction. An MDP may not be able to provide actual metering data for certain metering installations during a natural disaster but this is a matter that needs to be discussed with AEMO when it occurs. It is outside the scope of this procedure. This Procedure only applies where it has been determined that there is a metering installation malfunction. To address the potential for there being more than one identical metering installation malfunction, the application has been updated to clarify that an application form can be used for more than one NMI.
16.	AGL			The linkage between this clause (cl 2.5) and clause 2.8 seems unnecessary. This clause (2.5) indicates typical conditions AEMO may impose on an MC, but clause 2.8 makes these typical conditions mandatory on an MC during an exemption period. Suggest delete the typical conditions in cl 2.5 which are obligations in clause 2.8.	There is no linkage. Section 2.5 states that AEMO may grant an exemption on a conditional basis and provides examples of the types of conditions AEMO may impose, while section 2.8 details the conditions that will always apply to MCs during an exemption period. AEMO has reordered some of the provisions to ensure that those that must apply always are specified in section 2.8.
17.	Endeavour Energy	2.5	Grant of Exemption-	Procedural improvement: AEMO has made the draft MP's rectification plan mandatory with every exemption application. For avoidance of any confusion we suggest rewording clause 2.5.a to: "The Current MC must provide the final version of the MP's rectification plan in the form specified in section 3 for the rectification of the metering installation malfunction by a specified date. The Current MC must notify all affected Participants of the final version of the MP's rectification plan" Procedural improvement: Endeavour Energy supports having a requirement to notify affected participants, including the LNSP, of the granting or extending of an exemption. To make the notification more effective a notification SLA should be defined. Also the format of the notification should be defined to ensure consistency in the communication and a notification for revoking an exemption should be included. We suggest rewording clause 2.5.d to: "The Current MC must notify all affected Participants of the grant of the exemption or any extension to that exemption within 1 business day of receiving the approval from AEMO. The notification must include the application form, the MP's rectification plan and AEMO's letter of approval." We suggest rewording the last paragraph of clause 2.5 to: "If the Current MC fails to meet any condition specified in the grant of the exemption, AEMO may revoke the exemption by notice to the Current MC and all affected participants."	See comment #11. Agreed. Section 2.8(b) and 2.10 have been updated to require the MC to notify affected participants within one business day. Revocation is dealt with in the new section 2.10.
18.	Ergon Energy			In regards to AEMO's feedback on our request for a <i>force majeure</i> exemption clause, copied here for ease of reference: <i>AEMO does not understand the relevance of events of force majeure. An act of God, for example, will not necessarily lead to a metering installation malfunction unless the metering installation itself exhibits one or more of the outcomes specified in the definition.</i> <i>Hence, unless every metering installation in an area exhibited a characteristic that met the definition of a 'metering installation malfunction', AEMO does not foresee the need for a 'blanket' application.</i>	The application forms in Appendix A & Appendix B have been updated to clarify that one application can be used for more than one NMI, however, AEMO reiterates that force majeure events per se do not necessarily lead to a <i>metering installation malfunction</i> .

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 2): FINAL REPORT AND DETERMINATION  
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ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
				<p><i>Section 2.4(c) is flexible enough to give AEMO discretion to take into consideration the impact that of natural disaster on the MC's ability to meet the rectification timeframes in NER clause 7.8.10(a).</i></p> <p>The purpose of the 'blanket' exemption is not to cover every NMI in an area impacted by natural disaster (both those that may require repair or those that do not) but to cover the <i>region</i> in order to support a structured response to disaster recovery. This is because the procedure requires an individual exemption to be lodged for <u>every</u> NMI that cannot be repaired within the required timeframe. As such, in natural disaster situations, where many thousands of meters could be (and have been) damaged, the procedure will require thousands of individual exemption requests to be filled out and submitted to AEMO, where these meters cannot be repaired within the required timeframes. This per NMI requirement is not avoided by 2.4 (c), as the definition of <i>metering installation malfunction (and metering installation)</i>, and its application in the procedure, is singular, meaning that any NMI that malfunctions will require an exemption application (if it cannot be repaired within the necessary timeframe).</p> <p>Ergon Energy considers this to be an impractical process that will drive considerable costs, including for AEMO which must process the applications. Rather, AEMO could provide the flexibility to issue a 'blanket' exemption over areas impacted by a natural disaster. This would enable MCs to provide AEMO with one report post event that outlines the number of impacted NMIs and time taken to rectify.</p>	
19.	Ergon Energy Queensland (retail)	2.5 & 2.7	Grant of Exemption & Extension to Exemption	<p>EEQ suggests that a new sub-section be included as follows:</p> <p>In the instance of a force majeure where there a significant number of impacted NMI's, AEMO may at its discretion grant a blanket exemption, or extension to a blanket exemption, covering a large number of NMIs on a single <i>Application for Exemption/ Application for Extension</i>. This will be undertaken in consultation with the MC and will be considered on a case-by-case basis.</p> <p>EEQ's position is that the focus following these events should remain on returning supply and repairing or replacing malfunctioning meters for customers. Once supply and repairs have been made following a <i>force majeure</i> event, AEMO could require the MC to provide a full list of the NMIs where meters were found to be malfunctioning, and provide information on the length of time taken to repair or replace these meters. In this manner, AEMO will have access to the data that is required for its purposes and can ascertain whether the MC / MP actions were reasonable during these events.</p>	
20.	Active Stream	2.8	Current MC's Obligations during the Exemption Period	<p>Clause 7.8.10 (c), states that an MP must provide a rectification plan <b>if</b> an exemption has been granted.</p> <p>Suggest an additional clause to 2.8 similar to the second paragraph of 3.1 Timing. The Current MC must:</p> <p>Ensure that the MP's rectification plan is provided to AEMO in accordance with 7.8.10(c) of the NER, by the date specified by AEMO in its notice of exemption to the Current MC.</p>	See comment #11.
21.	Active Stream	2.8(b)	Current MC's Obligations during the Exemption Period	<p>There is no NER obligation to provide a rectification plan to all affected Participants. The obligation is to provide AEMO.</p> <p>The affected Participants have been advised of an exemption for the metering installation. If a change is made to the plan the only probable point of interest for other Participants would be that the exemption has been extended and this would be covered by 2.5 (d).</p> <p>Suggest removing: "and all affected Participants".</p> <p>This would cause additional administrative handling for no added value.</p>	AEMO considers that, as affected Participants, they should be aware of the efforts being undertaken to repair the affected metering installation and requires this of the Current MC if granted an exemption.
22.	Simply Energy	2.9	Expiry of Exemption	<p>The NER states that the application for the exemption must be made <u>by the MC</u> for a connection point, it doesn't say that exemption cannot be made applicable for the connection point, hence AEMO's interpretation is not same as our interpretation. MC should apply exemption <u>for the connection point</u>, and hence the exemption should be granted for that connection point, not associated with any MC or anyone else. Simply Energy would like this to be clarified, and would strongly recommend that this exemption should not sit with any role per say.</p>	The 'connection point' is not obliged to cause repairs to be made to the metering installation. See comment #1.
23.	AGL & Active Stream	3.1	Timing	<p>The NER obligation (CI 7.8.10(c)) requires the MP to provide the rectification Plan, not the MC.</p> <p>The procedure should be amended to recognise this.</p>	AEMO does not consider section 3.1 to be in conflict with NER clause 7.8.10(c).

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24.	Endeavour Energy			<p>Procedural improvement: AEMO has made the draft MP's rectification plan mandatory with every exemption application. For avoidance of any confusion we suggest rewording clause 3.1 to:</p> <p>"The Current MC must provide the MP's rectification plan with its application for exemption. If the final version of the MP's rectification plan is not available then a draft must be provided and the final version must be provided to AEMO in accordance with 7.8.10(c) of the NER, by the date specified by AEMO in its notice of exemption to the Current MC."</p>	AEMO does not consider the suggestion meets the NER requirements. See also comment #11.
25.	Active Stream	Appendix A.	Application for Exemption	<p>Qn 11: This cannot be answered unless a rectification plan is determined and provided. Given this is an application form for exemption and it is not mandatory/ or possibly practicable at the time of the application to provide a rectification plan, suggest the following:</p> <ul style="list-style-type: none"> <li>- This field becomes an 'if applicable' field, as the smaller font of this form advise to complete <b>all</b> sections.</li> </ul> <p>However, this question is more suited as a content of the rectification plan, section 3.2. Hence propose that it is removed from the application form and added to section 3.2.</p> <p>Clarification is sought as to why AEMO would want to know about non-viable rectification options for the metering installation malfunction which the MP has ruled out. Especially as the approach provided may be the only option.</p>	AEMO has amended the requirement. Applicants are now required to detail all options for rectification under consideration or provide a draft of the MP's rectification plan.
26.	AGL			<p>Item 11</p> <ol style="list-style-type: none"> <li>1. This field may not always be able to be answered when an exemption is submitted;</li> </ol> <p>The process for rectification may be standard and it is not relevant to waste time discussing non-viable options</p>	
27.	Active Stream & VectorAMS			<p>Remove the important note as AEMO's action is in contradiction of clause 7.8.10 (c). Defining the plan as 'draft' does not guarantee that a plan will be available at the time of application. Details which should be considered in determining to grant exemptions, should be what actions have already been taken to rectify the malfunction. This has been provided for in Q10.</p>	Agreed.
28.	Active Stream & AGL			<p>Propose the addition of a Unique Identifier to be provided for each exemption application. This would assist in referencing any queries or more specifically when requesting an extension to an existing exemption.</p>	AEMO will provide a unique ID after receipt of the application. The form does not come with a unique ID. Section 2.3 has been amended to require AEMO to provide the ID with confirmation of receipt.
29.	AGL			<p>Item 1 – Applicant</p> <p>Based on the two colons – is more than the participant ID required or is only the Participant ID – e.g. is the following required?</p> <p>Applicant: Joe Bloggs</p> <p>Participant ID: SOLARIS</p>	We have inserted 'Name' after 'Applicant' on the first line to make it clear what is required.
30.	AGL			<p>AGL queries the benefit of the postal address – a registered or accredited participant's address is lodged with AEMO and AGL would expect communications to be undertaken electronically.</p>	AEMO agrees, however, experience has shown that participants do not update their contact details when required.
31.	AGL			<p>Item 7</p> <p>AGL suggests that the circumstances that the fault was detected could be an enumerated list – this would simplify automation and consistency of these requests.</p>	AEMO cannot foresee all the possible circumstances in which notification could occur.
32.	AGL			Appendix A. Appendix B.	Application for Exemption Application for Extension
33.	Red Energy Lumo Energy	Appendix A.	Application for Exemption	<p>It is unclear from the form in Appendix A whether it can be submitted for multiple NMIs that are affected with the same malfunction, or whether AEMO is intending to receive one form per metering installation/NMI.</p>	

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				Red Energy and Lumo Energy recommend that where there is the same issue, that AEMO accept one form with multiple installations that require rectification. This is consistent with the requirements of the rectification plan.	
34.	Endeavour Energy & United Energy Endeavour Energy	Appendix A. Appendix B.	Application for Exemption Application for Extension	Procedural improvement: To prompt the applicant to consider who the Other affected participants to consider are we suggest rewording row 12 to: "Other (e.g. NSP2, EENSP etc):"	Agreed.
35.	Active Stream	Appendix B.	Application for Extension	If a Participant is applying for an extension to an existing exemption, it should be noted that in most scenarios if not all the existing rectification plan has to be updated. An updated rectification plan should be provided for an extension application.	Agreed.
36.	Red Energy Lumo Energy			As per above, the extension process should also be available for multiple metering installations/NMIs.	Agreed.
37.	AGL & Active Stream			An additional field is required to reference the identity of the ID number application.	See item 4 on the application form.
38.	AGL			Assuming that each application has a unique reference, the provision of standing information should not be required for an application for an exemption – merely those items which changed.	The three cited questions have been modified to require a response only if there have been changes since the date of the original application.
39.	Active Stream			As this is an extension of an existing exemption application which has been previously granted, section 9, 10, 11, 12 should already be available and hence would provide a duplication of effort. Suggest removing them.	



**Table 4 – MSATS Procedures: National Metering Identifier Procedure**

In the submissions, AEMO acknowledges that a number of comments were made about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table below.

ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
1.	AGL	General		<p>The order of material within this procedure seems to be haphazard.</p> <p>In general there seem to be sections on:</p> <ul style="list-style-type: none"> <li>NMI and NMI history (cl 2.1)</li> <li>NMI structure; and (Cl 3-8)</li> <li>Use of NMIs by AEMO – really examples – should be in the appendix</li> <li>LNSP / ENM obligations.(cl 2, Cl 9, cl 14 for LNSPs)</li> </ul> <p>These sections are however, split and separated across the procedure.</p> <p>Suggest that in the final version, the sections be re-allocated to a logical flow.</p> <p>Examples should be shown in Appendixes.</p>	Agreed, AEMO has restructured the procedure to flow more logically.
2.	Energy Intelligence			Can ENOs choose to move from one ENM to another? If Yes, What is the procedure for the same? How is the history of ENMs maintained in MSATS , as the LNSP Id for a child NMI will have to be updated in this scenario?	Refer to the AER Network Exemption Guidelines for details of EENSP appointment of ENMs. Changes to NMI records are retained in MSATS, refer to CATS History Model document on the AEMO website for more details
3.	Simply Energy			Simply Energy supports AEMO's conclusion in section 4.1 of the Draft Report and Determination.	Noted
4.	Red Lumo			<p>Red Energy and Lumo Energy do not think that the amendments to this Procedure have increased the clarity, and in some cases have increased ambiguity in what does and does not apply.</p> <p>For example, NMI Rule 2, which previously stated that a NMI cannot be changed or reallocated to another connection point, is indirectly covered off under section 1.1 which states that a NMI is a unique identifier. For new entrants, it is important to state that a NMI must not be re-allocated.</p> <p>Another example of the ambiguity is how 9.2(a)(iii), 9.2(a)(v) and 9.2(c)(viii) interrelate. It can be read that a NMI can be re-allocated when a site flips between being in and not in an embedded network, but it can also be read that a NMI can not be re-allocated where the role of ENM changes.</p> <p>Further, we consider that there is a gap between the NER and this Procedure. Rule 7.8.2(c)(2) does not appear to have been covered off in the Procedure.</p> <p>The rule states:</p> <p><i>7.8.2(c) The financially responsible Market Participant at a connection point must:</i></p> <p><i>(1) apply to the Local Network Service Provider for a NMI; and</i></p> <p><i>(2) provide the Metering Coordinator with the NMI for the metering installation within 5 business days of receiving the NMI from the Local Network Service Provider.</i></p> <p>Red Energy and Lumo Energy would like AEMO to revisit this Procedure and ensure that all obligations are unambiguous and abundantly clear.</p>	<p>AEMO has clarified section 9</p> <p>As this obligation exists in the NER, AEMO is not replicating it in the procedures.</p>
5.	United Energy	2.1	NMI Allocation by AEMO	<p>A number of participants including UE raised concerns regarding the clarity of the NMI blocks allocated to LNSPs and to ENMs. The NMI allocation list is a market readiness work stream matter and the ability to search in CATS for other NMI's within a local area networks geographic area is a matter for the systems working group. When will these two groups make these recommendations/decisions and advise the rest of industry and when will the NMI ranges be issued so these can be incorporated into internal procedures and work instructions?</p> <p>UE notes the NER Clause 11.87.3 (b) which requires AEMO to commence maintaining and publishing an interim list of Embedded Network Managers from 1 March 2017 onward. UE recommend that the NMI blocks allocated to ENs and those allocated to LNSP be clarified and issued in a document on 1 March 2017 with the AEMO obligations to finalise and issue the other EN guides and service level documentation etc. This would make the situation on NMI number ranges clear so the businesses can consider the impacts.</p>	This issue is not related to the procedures and will be referred to the POC system and readiness workstreams for consideration
6.	Select Solutions			As an ENM how long do we have to provide the NMI to the FRMP is the time regulated?	As per NER clause 7.8.2(ea) (2) it is within 5 business days of receiving the NMI from AEMO
7.	Endeavour Energy	2.2	Issue of NMIs by LNSPs and ENMs	Procedural improvement: Clause 2.2.a is difficult to read with the inclusion of the ENM. We suggest splitting this clause into two separate clauses as follows:	Agreed

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				<p>“For each new connection point the FRMP must apply to the relevant LNSP for a NMI prior to assuming responsibility for the connection point, and the LNSP must issue a NMI to the FRMP for that connection point from the LNSP’s allocated list.”</p> <p>“For each child connection point the FRMP must apply to the relevant ENM for a NMI prior to assuming responsibility for the child connection point and the ENM must issue a NMI to the FRMP for that child connection point as provided by AEMO.”</p>													
8.	Secure Meters			The wording of the 1 <sup>st</sup> sentence states “For each new connection point, or child connection Point” ---- suggest adding new NMI prior to child connection point otherwise every child connection point and not just new sites.													
9.	Secure Meters			<p>Clause (a) should be – The <i>NMI</i> is a ten (10) character identifier. The key attributes of a NMI are: --- reason takes greyness out of the statement and following clauses do not contradict.</p> <p>Clause (iv) totally contradicts clause (iii), hence needs – with the exception of NMIs allocated under clause (iii)</p>	The word ‘generally’ in paragraph (a) means that not all NMIs are numeric. Paragraph (iv) is related to using a number of alpha characters that describe the connection point and is not related to paragraph (iii).												
10.	Shopping Centre Council of Australia			We note the proposed change (3 (a)) whereby the ability for AEMO to allocate a block of NMIs to an ENM has been removed. This means that an ENM may have to approach AEMO each time for individual NMI allocation. This would seem to be an inefficient process, when compared with the previously proposed approach. Our assessment of the Consolidated <i>Summary of Submissions and AEMO Responses</i> does not readily identify why this change has been made. We would appreciate clarification on this issue.	Please see section 2.1, which details the NMI allocation by AEMO and it references the NMI blocks allocated and reserved for ENMs by AEMO. This reflects the NER.												
11.	United Energy	3	NMI Structure	<p>UE is concerned by the AEMO comment that there will be no embedded information in a NMI as stated in 3 (a) (iv). Whilst the AEMO comment is directed at the NMI range and allocation processes to ENs and the linkage of the NMI to a jurisdiction or an LNSP area, UE requests that AEMO clarify that the individual NMI ranges for each LNSP are to remain. We disagree that there is no embedded information in NMI’s as there certainly has been to date based on gas MIRN range by state and electricity NMI range by LNSP etc. If this is not the case this will impact our design and build processes.</p> <p>UE note that retailers are likely to use the NMI range linkage to the LNSP to facilitate retail tariff offers to customers. Where a NMI has no linkage to an LNSP this will be more work for the retailer to ensure a reasonable quote. UE note in 9.2 (c) (vi) that NMIs are not decommissioned where LNSP boundaries change. This seems inconsistent with the view that the NMI block is linked to the LNSP and hence LNSP network tariffs and retailer offers can be linked.</p> <p>Information embedded in NMI structure – refer to item 3 above. The drafting in 9.2 (c) (vi) whilst consistent with the approach of no embedded information is not consistent with what we believe is the industry norm, that the NMI indicates an LNSP and hence links to network and retail offers. Boundary changes of LNSP that then do not reflect the new NMI range would lose this interpretation which applies to the bulk of the market.</p>	<p>NMI ranges will still be allocated to LNSPs, however NMIs cannot have embedded information. This has always been the case in accordance with section 3(a)(iv), which has always existed in the NMI procedure.</p> <p>The requirement identified in 9.2(c) (vi) is not new, rather it is consistent with the requirements of the current NMI Procedure.</p>												
12.	Red Lumo	4	NMI Registers	Recommend that this reads LNSP not NSP.	Agreed												
13.	AGL	9.2	NMI Decommissioning	In respect of CI 9.2(a)(vi) the requirement to de-commission a NMI when the physical location changes likely needs further explanation as to the application of this requirement. For example, if a customer’s service is moved from one pole to another it is unlikely that a new NMI is required, although the physical connection point has changed – this may occur when a meter is relocated. See examples in 9.2(c).	AEMO does not consider that a change to this provision is necessary. The agreement of the distributor will usually be required to extinct a NMI if the physical location of the connection point has changed. This is implicit through the use of the NER defined term ‘ <i>connection point</i> ’, which by definition, is the point of supply as agreed with the distributor.												
14.				<p>Clause 9.2 of the draft procedure specifies that NMIs moving from LNSPs to ENs be <b>De-commissioned</b>. However, the AEMO ‘<i>POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 2) – DRAFT REPORT AND DETERMINATION</i>’ CI 4.1.4 stated in response to participant submissions that NMIs moving between LNSPs and ENs would ‘require the <b>extinction</b> of a NMI’.</p> <p>The drafting in CI 9.2 of the NMI procedure does not reflect this decision, as it’s discussed de-commissioning not extinction.</p> <p>Table 4.8 of the CATS procedure (draft) shows that there is a distinct difference between Decommissioned and Extinct.</p> <table border="1"> <thead> <tr> <th>Code</th> <th>Name of code</th> <th>Description of code</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Active NMI</td> <td>Applies when a <i>NMI</i> is energised.</td> </tr> <tr> <td>D</td> <td>Not energised NMI</td> <td>Applies when the <i>NMI</i> exists in MSATS and the <i>connection point</i> is de-energised physically.</td> </tr> <tr> <td>X</td> <td>Extinct NMI</td> <td>Applies when the <i>network connection</i> has been permanently removed from the <i>connection point</i>. Under this condition the existing</td> </tr> </tbody> </table>	Code	Name of code	Description of code	A	Active NMI	Applies when a <i>NMI</i> is energised.	D	Not energised NMI	Applies when the <i>NMI</i> exists in MSATS and the <i>connection point</i> is de-energised physically.	X	Extinct NMI	Applies when the <i>network connection</i> has been permanently removed from the <i>connection point</i> . Under this condition the existing	Agreed, the word extinction has been used in section 9.2 instead of decommissioning
Code	Name of code	Description of code															
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				<p><i>NMI will not be reallocated to any other connection point in the future.</i> <i>A NMI with this status can never be transferred.</i></p> <table border="1"> <tr> <td>G</td> <td>Greenfield site NMI</td> <td>Applies to Denotes a Site that has never been energised. The <i>connection point</i> may require further Site works to be undertaken and will also require energisation. Once the NMI Status Code is changed from 'G', it cannot revert to 'G'.</td> </tr> <tr> <td>R</td> <td>Remotely disconnected NMI</td> <td>Applies when the <i>NMI</i> exists in MSATS and the <i>connection point</i> is remotely disconnected</td> </tr> <tr> <td>N</td> <td>Off Market Child NMI</td> <td>Applies when a <i>child connection point</i> is no longer settled in the <i>NEM</i></td> </tr> </table> <p>AGL would like to see this section re-written to clearly show the NMI being made extinct. This information should also be included in the Embedded Network Guide.</p>	G	Greenfield site NMI	Applies to Denotes a Site that has never been energised. The <i>connection point</i> may require further Site works to be undertaken and will also require energisation. Once the NMI Status Code is changed from 'G', it cannot revert to 'G'.	R	Remotely disconnected NMI	Applies when the <i>NMI</i> exists in MSATS and the <i>connection point</i> is remotely disconnected	N	Off Market Child NMI	Applies when a <i>child connection point</i> is no longer settled in the <i>NEM</i>	
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N	Off Market Child NMI	Applies when a <i>child connection point</i> is no longer settled in the <i>NEM</i>												
15.	AusNet Services	9.2	NMI Decommissioning	<p>AusNet Services does not support the introduction of a NMI status code of "T" for transfer into or out of one NSP to another NSP as envisaged in the draft determination section 4.1.4, when using the Code of X will suffice. Customers seeking data for abolished NMIs can still request it even if the NMI is extinct. They should be able to find an old bill to provide the NMI to either the DNSP or retailer. We consider adding a new status code coming in round 3 consultation is too late for implementing the required system change.</p>	AEMO will consider this submission in Work Package 3 where MSATS changes resulting from the decision to extinct the NMI will be considered further.									
16.				<p>AusNet Services considers if AEMO support making the LNSP NMIs extinct when they become child NMIs then 9.2 (a) (iv) and (v) need to be reworded so that it includes the existence of a parent connection point and parent metering and the change of NMI and removal of LNSP metering occurring at the same time:</p> <p><del>(iv) a connection point directly connected to the LNSP's network becomes an off-market embedded network connection; for existing child connections points with an LNSP NMI on 1 Dec 17, once all LNSP metering has been removed;</del></p> <p><del>(v) a connection point directly connected to the LNSP's network becomes a child connection point;</del></p> <p>(v) where a parent connection point and parent meter has been established after 1 Dec 17, and once all LNSP provided metering has been removed, then all child connection points that were directly connected to the LNSPs network</p>	Refer to section 4.1 in the POC Procedures (Package 2) Final Report and Determination.									
17.	United Energy			<p>UE considers that 9.2 (a) (iv) and (v) should be amended. Where UE may still be providing metering services as MC/MP/MDP, it is far easier in our systems if the existing metering remains established in the NEM with a consistent LNSP NMI. UE considers there is substantial work to close metering and make one NMI extinct and then for the ENM to establish a new NMI and UE to re-establish the metering and data streams and this may also have implications for retailers systems.</p> <p>UE support 9.2 (a) (iii) remaining, UE systems do not cater for the rare off chance that an EN may cease and the non UE range NMIs need to be catered for in our systems.</p> <p>If in the final determination, AEMO support making the LNSP NMIs extinct when they become child NMI's then 9.2 (a) (iv) and (v) need to be reworded so that it includes the existence of a parent connection point and parent metering and the change of NMI and removal of LNSP metering occurring at the same time:</p> <p><del>(iv) a connection point directly connected to the LNSP's network becomes an off-market embedded network connection; for existing child connections points with an LNSP NMI on 1 Dec 17, once all LNSP metering as been removed</del></p> <p><del>(v) a connection point directly connected to the LNSP's network becomes a child connection point;</del></p> <p><del>(iv) where a parent connection point and parent meter has been established after 1 Dec 17, and once all LNSP provided metering has been removed, then all child connection points that were directly connected to the LNSPs network</del></p>										
18.	CitiPower & PowerCor			<p>CitiPower Powercor believes the wording "a connection point directly connected to the LNSP's network" is ambiguous, as in the example of a Multiple Occupancy "before" the installation of a 'Parent Meter' to create an Embedded Network, the tenancy connection point is connected via a private network that the LNSP is distributing over, rather than owning and maintaining this network. Strictly speaking the connection points aren't directly connected to the LNSP, the EN and the child connections (on market and off-market) are created by the existence of a Parent Meter.</p> <p>It's only the presence of a Parent Meter between these connection points and the LNSP's network that creates and defines their status as a Child connection point of an Embedded Network.</p>										

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				<p>CitiPower Powercor proposes the following amendments to the NMI Decommissioning clause:</p> <p>9.2 (a) A NMI in the metering register can only be recorded as de-commissioned in the metering register when:</p> <p>(iii) a child connection point becomes <u>directly</u> connected to the LNSP's network <u>and the parent metering connection point is removed.</u></p> <p>(iv) a connection point <u>directly</u> connected to the LNSP's network becomes an off-market embedded network connection <u>by commissioning of a parent metering connection point.</u></p> <p>(v) a connection point <u>directly</u> connected to the LNSP's network becomes a child connect point <u>by commissioning of a parent metering connection point.</u></p> <p>(vii) <u>a parent metering connection point connected to the LNSP's network is removed</u> (new clause)</p>	
19.	Endeavour Energy	9.2	NMI Decommissioning	<p>Procedural improvement: Endeavour Energy supports the change to de-commission the NMI when a connection point moves from a distribution network to an embedded network and vice versa. We also note that at the AEMO workshop on 20/12/2016 AEMO highlighted that in updating the draft procedure the intent was to "... clarify the conditions that require a NMI to be made extinct and those that do not allow for an extinction of the NMI". For avoidance of any doubt and for a consistent market approach it should be made clear that this obligation is mandatory. We suggest rewording clause 9.2.a to:</p> <p>"A NMI in the metering register must be recorded as de-commissioned in the metering register when:"</p> <p>Procedural improvement: For avoidance of any doubt it should be made clear that the application of clause 9.2.b is at the discretion of the LNSP. We suggest rewording clause 9.2.b to:</p> <p>"When a NMI is allocated to a builder's temporary supply, the same NMI may be re-used for the permanent supply once construction is completed, as determined by the LNSP provided."</p> <p>Procedural improvement: Clause 9.2.c.iii is highlighting two different scenarios. We suggest splitting this into two separate clauses.</p> <p>Procedural improvement: The second scenario highlighted in clause 9.2.c.iii should make it clear that this scenario only applies if both services are not concurrently operational. We suggest rewording the second scenario of clause 9.2.c.iii to:</p> <p>"a relocation of the meter enclosure without changes being made to the location of the measurement transformers provided both services are not concurrently operational;"</p>	<p>Agreed, but drafted differently</p> <p>AEMO does not consider that a change to this provision is necessary. The agreement of the distributor is already incorporated into the provision through the use of the NER defined term '<i>connection point</i>', which by definition, is the point as agreed with the distributor.</p> <p>AEMO does not understand the concern raised in relation to 9.2(c), the participant comment does not match with the context of the clause.</p>
20.	SA Power Networks	9.2	NMI Decommissioning	<p>SA Power Networks are supportive of the changes made by AEMO with regards to embedded networks and the management of NMI's made within this section.</p>	Noted
21.	United Energy	9.2	NMI Decommissioning	<p>Decommissioning is a gas term, not an electricity term. The terminology may be better as NMI extinction consistent with the NMI status code approach.</p> <p>UE do not support the introduction of a NMI status code of "T" for transfer into or out of one NSP to another NSP as envisaged in the draft determination section 4.1.4. We have X, or will have N, and should use these. A new status code coming in round 3 consultation is too late.</p> <p>UE has given further thought to the LNSP NMI being made extinct once it is connected to the EN:</p> <ul style="list-style-type: none"> <li>AEMO say that if the LNSP is providing metering then they remain in the MC/RP and MP/MDP roles for the children as Initial MC. Whilst we don't believe this is consistent with NER 11.86.7 and other aspects of the NER we agree that this is the most likely outcome.</li> <li>If the LNSP makes the LNSP NMI extinct and the ENM needs to create a new NMI and apply standing data, the LNSPs that are initial MCs will need to re-establish the metering installation, data streams etc. in the NEM. UE consider that there should be transitional arrangement drafted into the procedure.</li> <li>UE re-iterate the comments from pack 1 consultation that the arrangements for EN need separate meetings and considerations as this is a complicated transition</li> </ul> <p>9.2 (c) (vii) should be amended to make it clearer. We understand that the intent is that if the party that is in the ENM role changes to another ENM then the NMI must not be made extinct. If the party in the LNSP role changes to another LNSP indicating a change of Boundary, then we consider that the NMI possibly should change. This seems a repeat of the point in (vi) and we suggest that the clause be redrafted to</p> <p>9.2 (c) (vii) changes to the party in the Role of <del>LNSP</del> or ENM</p>	<p>Agreed, the word extinction has been used in section 9.2 instead of decommissioning</p> <p>AEMO will consider this submission regarding the 'T' NMI status code in Work Package 3 where MSATS changes resulting from the decision to extinct the NMI will be considered further.</p> <p>The procedure is only effective from 1 December 2017 and it only applies to NMIs moving between networks after 1 December 2017. AEMO will refer this issue to the readiness workstream.</p> <p>Agreed</p>

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22.	Shopping Centre Council of Australia	10	UTILISATION OF NMI FOR AEMO DATA	<p>We note the change from the previously proposed approach, whereby we supported that when a NMI moves from a distribution (LNSP) network to an embedded network (or vice versa), the NMI cannot be changed.</p> <p>It is now proposed that such an such a circumstance will be added to the conditions that require the extinction of a NMI. We note that despite the proposed change, this is not AEMO's preferred option (ref: 4.1.4 – Draft Report and Determination).</p> <p>We do not support the proposed change, and do not believe that the proposed change will support positive customer outcomes.</p>	As highlighted in the Draft Report and Determination, AEMO will consider consequential changes in PoC work package 3 regarding the extinction of a NMI in the circumstances discussed.
23.	Endeavour Energy	10.1	Data Delivery to AEMO (MSATS System)	<p>Procedural improvement: net energy is only applicable to interval metering data. We suggest rewording clause 10.1.b to:</p> <p><i>“Interval metering data is always provided as net energy flow to MSATS.”</i></p>	Agreed

**Table 5 – Qualification Procedure (MP, MDP, ENM)**

In the submissions, AEMO acknowledges that a number of comments were made about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table below.

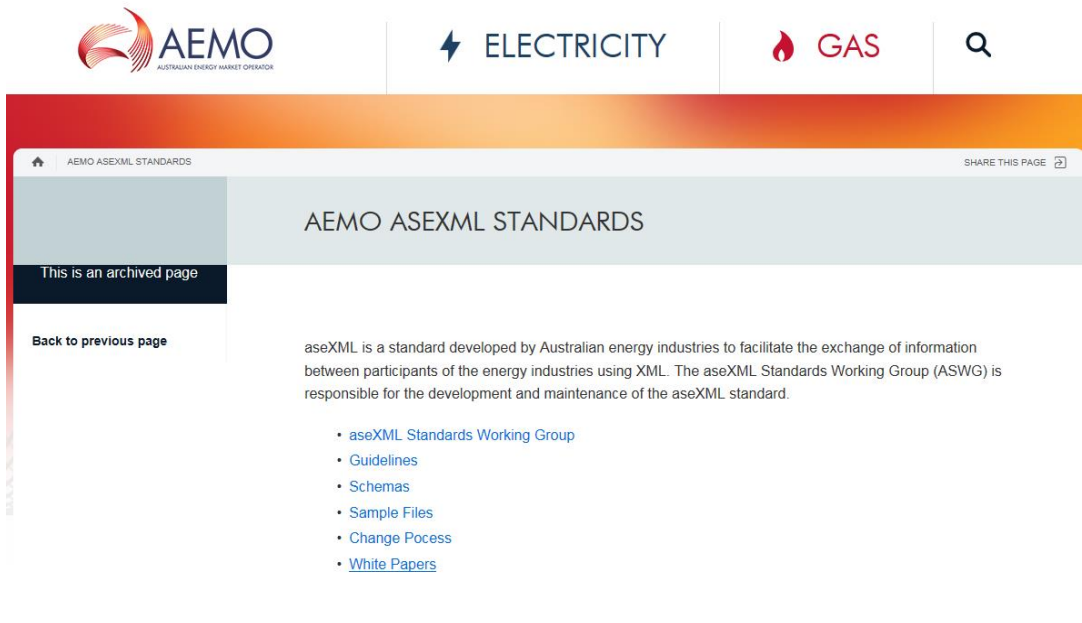
ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
1.	AGL		General	While this is a qualification process for specific functions it would be useful if a complete checklist of requirements was provided in the appendix – including elements such as MSATS and Market Net application forms, which although separate – are required for operation in these roles.	Section 1.3 “Related AEMO Documents” has been updated to include a link to the Accreditation Checklists (now called Requirements). Links to information regarding MarketNet and MSATs are provided in sections 3.5.2 and 3.5.3.
2.	ActewAGL	2.2.	Pre-Reading	Would be useful to have website links to all the pre-reading documents in addition to the name of the pre reading document. Will this document need to go out for consultation again if the B2B procedures are incorrect? or since only a reference, can just get updated?	Agreed. This will be done by 1 Dec 17. This document will not be required to go through consultation again if/when B2B references are updated.
3.	AGL	2.3.	Pre-Application Meetings	The pre-reading list should cover MSATS systems access and MarketNet access.	These are not suitable subjects for pre-reading, but necessary once a decision has been made to become accredited and registered. MarketNet and MSATS access requirements are detailed in section 3.5.2 and 3.5.3.
4.	Energy Intelligence			In the best interests of new applicants, Any contact details/ email Id or contact no of the relevant department dealing with the application process can be added. This will be useful for the applicants to arrange for a pre-application meeting.	Information will be available on AEMO’s website.
5.	ActewAGL			Link still to be defined [link]3	The sample answers will be available to participants as part of the market readiness program.
6.	United Energy	3.2.	Accreditation Checklists	The exemption procedure makes it clear that LNSPs as MCs have type 5/6 metering installations and in accordance with 11.86.7 do not need to apply for exemptions. UE agree with this approach. This means that before/on/after 1 Dec 17 the LNSP meters remain type 5/6.  This is inconsistent with the approach that AEMO has taken in response to item 24 that Vic DBs need to be accredited for type 4 MDP services. UE is unclear which clause requires an existing meter in the NEM with comms to be renamed to a different meter type and which clauses prevents a DB from exceeding the meter requirement. Before spending the money to implement these changes which we believe have no benefit, UE wishes to understand the benefits.	The Exemption Procedure does not require the LNSPs as MCs for regulated assets (type 5/6 metering installations) to apply for an exemption when the regulated assets fail. This does not imply that VIC AMI meters are not type 4.  There is no inconsistency here.  Under the current NER, VIC AMI providers are accredited to provide services for manually read metering installations (whilst AEMO accreditation reviews may have considered the operation of the VIC AMI installations, AEMO only has powers to accredit as type 5 due to the requirements of the VIC AMI derogations (9.9(a), 9.9(b) and 9.9(c)).  Type 5 services require (amongst other things): <ul style="list-style-type: none"> <li>• establishment of Next Scheduled Read Dates (NSRDs);</li> <li>• provision of forward estimates;</li> <li>• processes to be established for the manual collection of metering data; and</li> <li>• processing of metering data (including substitution) to be done in accordance with requirements for manually read metering installations.</li> </ul> From 1 Dec 17, the current derogation (clause 9.9(c)), which requires these remotely read metering installations to be treated type 5, expires.  As a result of the expiry of clause 9.9(c), the remotely read VIC AMI metering installations need to be treated within the NER framework as remotely read metering installations and any provider needs to be accredited to provide remotely read metering installations.  Remotely read metering installations require: <ul style="list-style-type: none"> <li>• processes and systems for the remote acquisition of metering data</li> <li>• processing of metering data (including substitution) to be done in accordance with requirements for remotely read metering installations (see Metrology Procedure Part B).</li> </ul> AEMO has established categories of accreditation in accordance with the NER. The category that deals with accreditation of remotely read metering installations for small customers in Victoria is known as type 4. AEMO, therefore, considers it necessary for VIC AMI providers to obtain type 4 MDP accreditation in order to provide services at these metering installations from 1 Dec 17. Note that AEMO has made a number of changes to Metrology Procedure Part B to minimise the changes required by VIC AMI providers to comply with this requirement. AEMO also notes that type 4 MP accreditations are already established within each VIC AMI provider’s business, therefore, no new type 4 MP accreditation appears to be required.
7.	ActewAGL	3.3.	Application Fees	Is it correct to assume 30 days is referring to 30 calendar days?  If the applicant is overdue in paying an invoice by more than 30 days, AEMO will suspend all assessments until payment is made.	‘days’ is an NER defined term. The 30 days in the procedure is intended to be 30 calendar days.

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8.	United Energy			Item 32 States Vic DBs need accreditation as Type 4 MP and MDP as the derogation has ended Query whether Type 4 MP is required as we understand all Vic Dbs are already accredited for MP. What is involved in non extensive accreditation?	See response to comment #6.
9.	AGL	3.4.	Queuing Policy	AGL suggests that applications which are deemed complete by AEMO are placed in the queue, not incomplete applications.	Completed applications are placed in the queue in accordance with section 3.4.1. Where additional documentation is not provided to AEMO by the requested date, the application will be placed at the end of the queue in accordance with section 3.4.2.
10.	United Energy			Suggest 3.4.4 be deleted. If an applicant has been placed at the end of the queue as they needed more time to respond to an item, if AEMO does not get back to the accreditation application in 3 months, then the application is deemed to be withdrawn by AEMO. The only party that should be able to withdraw their application is the party applying.	The 3 month period referred to in (old) section 3.4.4 is related to the period of time the applicant takes to provide a response or documentation that AEMO has requested. It's not related to the time AEMO takes to respond to participant. Applications cannot be left in limbo for extended periods of time.
11.	AGL	3.5.	Pre-Production Assessment	The MSATS and MarketNet requirements should be included in the pre-reading list and in clause 2.	See response to comment #3.
12.	Endeavour Energy			Procedural improvement: Clause 3.5.1 contradicts clause 7.17.1.d, 7.17.1.e and 7.17.1.f of the NER which places an obligation on the ENM to comply with the B2B Procedures and use the B2B e-Hub unless agreed otherwise with other B2B Parties. We suggest rewording the first paragraph of clause 3.5.1 to:  "After accreditation and registration, MPs (except Category A), MDPs (except Category C) and ENMs will require access to AEMO's MarketNet, MSATS and the B2B e-Hub"	In the first round of consultation, EnergyAustralia, Aurora Energy and Simply Energy commented that, technically, the ENM is not required to use the B2B e-hub. AEMO agrees with that proposition insofar as ENMs can agree with other B2B parties not to use it.  Provision updated to try to address all sides.
13.	Active Stream	3.4.3	Applicant not Responsive during Qualification Process	If the requested documentation is not provided or application fee not paid by the requested date and time, the application will be placed at the end of the queue.  Clarification is sought if AEMO will advise the applicant that they have been placed at the end of the queue	Yes, we will. The document has been updated.
14.	Active Stream	3.4.4	Deemed Withdrawal of Application	Clarification is sought if AEMO will confirm the application as withdrawn.	Yes, we will. The document has been updated.
15.	Active Stream	5	Re-accreditation and Registration	Re-accreditation may be necessary for reasons such as a change to the NER, or accreditation requirements, changes to Participant processes, systems or key personnel, or as a result of action taken under the Default and Deregistration Procedure.  Clarification is sought as to whom AEMO class as key personnel and why would this require re-accreditation. If the business and systems processes are accredited why would there be a requirement for key personnel to trigger a re-accreditation?	The applicant must nominate its key personnel as part of its application. See Section 2 of the Accreditation Checklists (now termed Requirements).

**Table 6 – Service Level Procedure (ENM)**

In the submissions, AEMO acknowledges that a number of comments were made about style, typographical errors and related issues. Where appropriate, AEMO has taken these comments on board, but they are not included in the table below.

ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
1.	Energy Australia	General		EA is pleased with the inclusion of the hierarchy of rules that assist in clarifying conditions when a NMI is to be made extinct.	Noted
2.	ActewAGL	1.3	Related AEMO Documents	<p><a href="http://www.aemo.com.au/About-the-Industry/Information-Systems/aseXML-Standards">http://www.aemo.com.au/About-the-Industry/Information-Systems/aseXML-Standards</a></p> <p>The above link goes to an archived page and the subsequent links on the page don't allow drill down to aseXML Standards Working Group, Guidelines, Schemas, Sample Files, Change Process, White Papers etc.</p> 	Agreed, Link is updated
3.	United Energy			The new EN Guide should be on the AEMO website, however it should not replace the old Guide on the link but retain the history. The old Guide should remain on the website as valid from 2009 and the new Guide takes over from 1 Dec 17 so that the history of the changes is maintained in the one location on the AEMO website.	Agreed, and old version of the guide will be retained similar to other documents on the AEMO website until 1 Dec, when the old one will be archived.
4.	Shopping Centre Council of Australia	3.1	Systems and Interface Requirements	<p>We remain concerned with section 3.1 (e).</p> <p>The AEMO has stated in its response to previous submissions that the intention of this provision is to ensure that an End User can seek an alternate energy provider. At this is the case, we recommend defining 'intellectual property' as being all information required by an End User to allow the End User to move to an alternative energy provider. We suggest that the current use of 'intellectual property' as an undefined term is too broad and could result in the unintended transfer of intellectual property rights in the ENM's ancillary information (such as programs or processes used by an ENM) to a third party.</p> <p>We also clarify that our previous comments in relation to 'security issues' relate literally to issues involving property and personal security, including the need to ensure that a shopping centre's wiring information and intellectual property, to the extent it relates to a security system (e.g. CCTV, control room), should not be required.</p> <p>We do not believe that the insertion of the term "relevant" in front of "wiring information" satisfies the points made above or below.</p> <p>In terms of the business interface for ENMs, we remain concerned that AEMO is committing ENMs to potential costs that we are still unable to ascertain.</p>	<p>Section 3.1(e) is restricted to:</p> <ul style="list-style-type: none"> <li>those 'documents, plans or other information' that the ENM has provided to AEMO or any other person in accordance with the SLP (ENM); and</li> <li>the use of those 'documents, plans or other information' by a recipient for the purpose of fulfilling the recipient's obligations under the NER or any procedure under the NER.</li> </ul> <p>AEMO fails to see how any recipient could require that an ENM provide it with what SCCA calls 'ancillary information' and does not see the need for any amendment.</p> <p>AEMO also considers that ENMs can manage the risk of breaching 'security issues' by maintaining wiring information that relates exclusively to the embedded network separately from any other wiring information so that any wiring information relating to assets other than the embedded network does not have to be provided to anyone. The word 'relevant' captures the essence of what is required.</p> <p>AEMO is unclear what is meant by 'business interface for ENMs'.</p> <p>It is a rule requirement that an ENM provide embedded network management services, and to perform those services ENMs will need to perform market interface functions using AEMO's systems</p>



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5.		3.3	Audits Undertaken by AEMO	We maintain our previous comments that the proposed auditing requirements seem to be excessive. AEMO has not, in our view, appropriately addressed the issue to ensure that cost and time will be appropriate for relatively small participants.	AEMO also maintains its response in the draft determination that: “ENMs are new providers in the market, the outcomes of the initial audit and ongoing monitoring will enable AEMO to determine future audit requirements.”	
6.	Energy Intelligence	3.4	Other Audits	Can AEMO include a high level Audit process in the document?	A high level of the audit process is detailed in section 3.3 of the procedure. Auditors are required to comply with the relevant standards published by the Australian Auditing and Assurance Standards Board.	
7.	Secure Meters			In (a) it states that a registered participant can request an audit, what about an accredited participant or end use customer?	AEMO will defer any consideration of this suggestion to the next time a consultation on all three SLPs is commenced as this was not proposed for the SLP for MPs or MDPs.	
8.	Simply Energy	3.5	Review of Accreditation	Editorial – there should be an “or” after every sub-item, i.e. after (a) and (b) as well.	The use of semicolons between the paragraphs, and then the use of ‘or’ in paragraph (c) indicates that it is a list of options. The submission suggests AEMO adopt Dickensian drafting, which is not our preferred option.	
9.	AusNet Services	4.1	NMI Allocation	AusNet Services recommends expanding section 4.1 to cater for all of these situations relating to EN formation and NMI allocation, especially for situations where an off market child who has an existing connection with no NMI.	AEMO believes that the NMI allocation process detailed in section 4.1 covers all the scenarios of allocating a NMI to a child connection point that has no NMI whether the connection point existed as an off market child connection point previously or not, however AEMO will clarify step (a) as currently it doesn’t quite apply to every scenario.  AEMO will refer the issue of the existing embedded networks and how they should be handled on 1 December 2017 to the market readiness workstream for consideration in the transition and cutover plan.	
10.	United Energy			This clause appears to be deal with straight forward cases: <ul style="list-style-type: none"> <li>ENM to manage the creation of a new greenfield network and assignment of NMIs; and</li> <li>ENM to manage new connections on an existing network after 1 Dec 17 and assign NMIs.</li> </ul> We note the issues for 1 Dec 17 for all existing EN and how the NMI’s are managed: <ul style="list-style-type: none"> <li>The ENO must appoint an ENM, the ENM must use a CR6100 to churn the LNSP role to themselves for 1 Dec 17. Subject to the outcome of the NMI decommissioning process, the ENM must de-commission the LNSP NMI only once all LNSP metering has been removed and allocate an EN NMI using a CR2520.</li> </ul> Where there is a new brownfield EN created after 1 Dec 2017. We would expect the process for day 1 transition also be adopted but only after the parent connection and parent meter is in place. Section 4.1 needs to be expanded to cater for all of these situations relating to EN formation and NMI allocation.		
11.	Red Lumo			Red Energy and Lumo Energy consider that the additional obligations in clause 4.1(d) should sit in the MSATS Procedure and not in the ENM SLP. We do not consider that MSATS obligations should be duplicated into the SLPs.		References to Change Requests and MSATS point ENMs, and new market players, in the right direction. The ENM will still have to follow the MSATS Procedures to effect the change. It is very rare that Change Requests change in MSATS, and on that basis if a change occurs to any of the CRs mentioned in the ENM SLP, the ENM SLP will be updated consequently.
12.	Secure Meters			The change from referencing the MSATS procedures to naming the CRs # will require this procedure to change if there is a change to the MSATS procedures.		
13.	Simply Energy			While the ENM has five business days to provide the NMI when it is created, there is no SLA on how long it will take to allocate a NMI, which is not good customer experience as well as a poor business practice from a retailer perspective. It is not reasonable for the ENM to have no SLA for the allocation of a NMI. We’d recommend redrafting the following clause:  (b) Upon request from a retailer for a new connection for a metering installation at a child connection point, apply to AEMO for a NMI for that child connection point, <i>within two business days</i> .  SIMPLY ENERGY strongly recommends that the process from request to provision of NMI should be achievable within five business days.		AEMO has redrafted this provision to align better with NER clause 7.8.2(e)(2). If participants wish to see the whole process, from end-to-end, take no more than 5 business days, they should enter into an appropriate service level agreement with ENMs.
14.	Red Lumo	4.2.1	Overview	It is unclear what type of response is required from “AEMO expects”. Is it a may, must or should obligation being placed on the ENM?	The provision of site-specific DLFs is something that will be done by the EENSP in accordance with the AER Network Exemption Guidelines, and AEMO does not have the power to impose any obligations on the EENSP, hence the drafting.	
15.	Secure Meters			The statement made in (b) is in conflict with the Embedded Network Guide clause “3”, where the DLF of a child NMI is back to the parent NMI and to calculate the actual DLF back to transmission point for a child NMI is Parent DLF X Child DLF and that unless the emdedded network DLFs are determined and published the value of the child DLF should set to 1.0  The Overview could be reduced to, Unless there are significant losses between the Parent NMI and a Child NMI the DLF code for a child should be equal to 1.0	The current Embedded Network Guidelines on the AEMO website will be replaced by the new Guide to Embedded Networks, which has been circulated by AEMO for feedback on 23 <sup>rd</sup> December 2016. Both the ENM SLP and the new Guide to Embedded Networks align with the new Rule and the AER Network Exemption Guidelines on this issue.	

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ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
16.		4.2.2	Site specific DLF	A site specific DLF for a child should be to account for any additional losses from the Parent NMI to the Child Connection Point remembering the settlement of a Child NMI to the TNI is calculated by Child Meter Reading X Child DLF X Parent DLF hence if the Child DLF is calculated back to the TNI the figure will be incorrect for settlement.	
17.		4.2.3	Small load DLF	If the Child NMI has the same DLF code as the parent this will mean the calculation of the Child DLF to the TNI will be Parent DLF x Child DLF and unless the Parent DLF is any other than 1 will cause problems in settlement.	
18.	Red Lumo	4.3	MSATS Setup	See comments for NMI Allocation. Red Energy and Lumo Energy consider that all MSATS obligations should sit in the appropriate Procedure (MSATS). We consider that without all obligations sitting in one Procedure, it is more likely to have divergence in processes.	References to Change Requests and MSATS point ENMs, and new market players, in the right direction. The ENM will still have to follow the MSATS Procedures to effect the change. It is very rare that Change Requests change in MSATS, and on that basis if a change occurred to any of the CRs mentioned in the ENM SLP, the ENM SLP will be updated.
19.	Aurora Energy	4.3.1	Market Exit	Upon request from the FRMP of the Child NMI, The ENM must update the NMI Status Code of the Child NMI in MSATS to 'N'	When a child connection point exists the market which means that it is no longer settled in the market, it does not mean that the connection point is moving from the embedded network to an LNSP network, hence the NMI extinct rules do not apply.
20.	Secure Meters			Aurora Energy comments - this is no longer valid. As soon as a NMI becomes a child or a child goes on market again that NMI is made X in the market and a new NMI is created? If the NMI exits a DNSP it is abolished why should when a NMI exits a Embedded Network shouldn't the NMI be abolished	
21.	United Energy			The procedures do not clearly describe the process for performing a 'market exit' when a NMI is becoming part of an embedded network as an 'off market connection point'. Could AEMO please make it clear whether there is an expectation that the CR509x is used prior to any of the clauses listed within this section to make the relevant NMI a Child NMI and change the LNSP role (and whether a CR to Change the LNSP Role is required prior to this). UE then assumes that the ENM would update the NMI Status to 'N', before the remaining steps described are completed.	
22.	United Energy	4.3.2	Resumption as Child Connection Point	This scenario covers an off market child with a NMI being reactivated in the market by changing NMI status from N to A. There is no obligation in 4.1 that every child within an EN has an allocated NMI right from the commencement of the EN. Where is the obligation that an off market child who has an existing connection with no NMI is allocated a NMI so they can churn to their retailer of choice?	Agreed, the provision needs to be made clearer whether there has already been a NMI previously allocated to the embedded network connection point. However an Off-Market Child NMI returning to the market as On-Market Child NMI does not require extinguishing the previous NMI and creating a new one, as the NMI has been a Child NMI and it was not moved from an LNSP network to an embedded network, hence the NMI extinct rules do not apply.
23.	Secure Meters			If a NMI is returning to the market the connection should be treated as a New Connection	
24.	AGL			The processes described in this clause relating to updating a NMI to status "A" is inconsistent with previous discussions regarding making NMIs extinct. AGL does not expect to see child NMIs resuming in the market. AGL would expect the process to be: <ul style="list-style-type: none"> <li>Apply to ENM for a NMI (if no ENM to appoint ENM)</li> <li>When NMI created – churn meter (if required by retailer)</li> </ul> On meter churn NMI becomes active within the market (like a new connection).	
25.	Select Solutions	4.3.3	Network Tariff Code Update	<i>The ENM must carry out the following actions in MSATS:</i> (a) ensure the Network Tariff Code created by the MPB when the meter was recorded in MSATS for a child connection point is correct; and (b) update the Network Tariff Code if it was incorrect for any child connection point using Change Request 'Maintain Metering – Change Network Tariff Code' with CR Code 3100 or 3101.  MPB responsibility is to update Tariff code not create it? How will the ENM confirm the correct Tariff, e.g with DNSP? FRMP? Or ENSP? Will this be based on agreements with the parties?	The Network Tariff Code field is mandatory for MPs as per the MSATS procedure changes in POC Package 1 which were released 31 August 2016.  AEMO considers that parties are appropriately incentivised to ensure that the Network Tariff Code is updated correctly, at least for the reasons identified the submissions. Contracts will exist that link the DNSP to the MP, at least indirectly via the FRMP and MC if not more directly in some cases, and it is reasonable to consider that information on, and requirements for, the updating of the Network Tariff Code can be considered in those agreements.  MPs will need to work with other parties to ensure they have access to sufficient information to enable them to update the field correctly. While information from MSATS may be made available to the MP regarding an existing code at a NMI, the MP should only use this code if it remains consistent with the changes undertaken at the metering installation.
26.	AGL	4.3.4	De-energisation and Re-energisation of Child NMIs	In respect to maintaining the NMI Status being in MSATS, it is expected that the NMI Status would be updated if the Embedded Network Operator disconnected the child site (like a DNSP) – the ENM would be responsible for updating the NMI status. If however, the site is disconnected by a remote service,	This procedure is only related to the obligations of the ENM and not any other parties, hence it is not suitable to mention MPs' obligations. Please refer to the MSATS procedures for the obligations to update the NMI Status Code and the Meter Register Status Code.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 2): FINAL REPORT AND DETERMINATION  
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	PARTICIPANT COMMENT	AEMO RESPONSE
				then the MP is responsible for updating the NMI Register Status. This should be clarified in this Procedure.	
27.	Energy Australia			In the circumstance of de-energisation or re-energisation being facilitated by a remote service for a child NMI in an embedded network, the MP should be responsible for NMI register updates. Please clarify this in the procedure.	
28.	AGL			In respect to this clause is it possible for a child connection point to have an accumulation meter?	It is possible that existing child connection points might have accumulation meters installed before 1 December 2017.
29.	Aurora Energy			If a NMI is N but is also Active this indicates that there are also states of a child NMI that can be A,D or X – is the N status only for off market Child NMI's ? I believed this was no longer valid due to the fact as soon as a NMI becomes a child or a child goes on market that NMI is made X in the market and a new NMI is created?	The 'N' status is only used for Child NMIs becoming Off-Market, which is not the same thing as a NMI moving from an LNSP network to an embedded network or vice versa, hence the NMI is not being made extinct and the 'N' status is the one to be used for Child NMIs becoming Off-Market..
30.	Red Lumo			It is unclear whether the ENM will be also required to change the Child NMI status at the meter level where the de-energisation has been completed remotely, equivalent to the requirements placed on MPs in the MSATS Procedures. From a governance perspective, the obligations should be both consistent and placed in the MSATS Procedure.	The procedure is clear that the ENM is updating the "Child NMI Status Code", and there is no mention of the Meter Register Status Code, which is an MP obligation and not relevant for the purposes of this procedure.
31.	AGL			In respect to this clause is it possible for a child connection point to have an accumulation meter?	It is possible that existing child connection points might have accumulation meters installed before 1 December 2017.
32.	VectorAMS	4.3.5	Child NMI Abolishment	In light of AEMO discussions during this consultation related to making EN NMI's extinct once they are no longer part of the DNSP network, clarification is sort in this procedure on the circumstances that extinction is to occur. i.e. is it when a Child NMI leaves the DSNP Network? Is this only when physical characteristics of the connection Point Change? Or when it is no longer settled in the market? Clarification is sort with examples.	The circumstances for extinguishing the NMIs are detailed in the NMI Procedure and is not relevant in this procedure.

**Table 7 – Unmetered Load Guideline**

AEMO received no submissions on the Unmetered Load Guideline in the Second Stage of Consultation.

**Table 8 – Other Issues Related to Consultation Matter**

In the submissions, AEMO acknowledges that a number of comments were made about Package 2 Guidelines and Checklists. The comments are not included in the table below as the Guidelines and Checklists are outside the scope of this procedure consultation, however AEMO will consider those comments when updating those documents for publication by 28<sup>th</sup> Feb 2017.

ITEM	RESPONDENT	DOCUMENT	CLAUSE	HEADING/DEFINITION	PARTICIPANT COMMENT	AEMO RESPONSE
1.	SA Power Networks	PoC Procedure Changes (Package 2) – Draft Report and Determination	4.1.4 (1)	MSATS CATS and WIGS procedures	SA Power Networks does not support the need for any additional NMI Status Codes (AEMO suggested that a new code of “T” may need to be created) within MSATS. The current Extinct status is all that industry requires.	AEMO will consider this feedback in workpackage 3 where MSATS changes resulting from the decision to extinct the NMI will be analysed.
2.	United Energy				<p>Table 8, item 9.</p> <p>UE support the Simply Energy request for build packs, use cases and process flows for all CATS transactions. UE note that AEMO advise that this is a matter for the readiness and systems working group and would be worthwhile to ensure that participants all have the same understanding of the processes and services work.</p> <p>It would be useful for this to be available as early as possible to ensure that our design and build decisions are consistent with the build pack and processes.</p>	This issue will be referred to the POC system and readiness workstreams for consideration.