16 January 2016

energex
positive energy

Ms Karen Olesnicky
Acting Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
MELBOURNE VIC 3000

Dear Ms Olesnicky

Power of Choice Procedure Changes (Package 2) – Second Stage

Energex appreciates the opportunity to provide a submission on the Australian Energy Market Operator's (AEMO's) second stage consultation on the Power of Choice Procedures (Package 2) relating to the expanding competition in metering, embedded networks and meter replacement processes rule changes.

In response to this consultation, please find attached a completed Participant Response Template (**Attachment A**). This response provides Energex's recommendations for amendments where it is considered that further clarity or improvements to drafting is required.

Energex acknowledges the significant work undertaken to date by both AEMO and industry in drafting the proposed amendments to existing procedures and proposed new procedures to take into account the Power of Choice reforms commencing on 1 December 2017.

Energex looks forward to participating further in the Power of Choice program of work. If you have any questions in relation to this submission, please do not hesitate to contact Charmain Martin on (07) 3664 4105.

Yours sincerely

Jenny Doyle
General Manager Regulation & Pricing

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ATTACHMENT A

METERING COMPETITION
EMBEDDED NETWORKS
METER REPLACEMENT PROCESSES

POC PROCEDURES CONSULTATION (PACKAGE 2)

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: Energex Limited*

***Completion Date**: 16 January 2016*

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1. Glossary and Framework

Please delete any rows where there are no participant comments

No comment.

2. Default & Deregistration Procedure (MP, MDP, ENM, MC)

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
5.2	MC	(b) Further clarity is required to understand if this clause can be applied to large customers where they have been identified by AEMO.

3. Exemption Procedure (Metering Installation Malfunctions)

Please delete any rows where there are no participant comments

Clause	Heading	Participant Comments
2.4	Matters taken into Consideration	(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.

4. MSATS Procedures: National Metering Identifier

Please delete any rows where there are no participant comments

No comment.

5. Qualification Procedure

Please delete any rows where there are no participant comments

No comment.

6. Service Level Procedure – Embedded Network Manager

Please delete any rows where there are no participant comments

No comment.

7. Unmetered Load Guideline

Please delete any rows where there are no participant comments

No comment.

8. Other Issues Related to Consultation Subject Matter

No comment.