

METERING INSTALLATION EXEMPTION AUTOMATION CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the metering installation exemption automation consultation.

2. Question on Metering Installation Exemption Automation Effective Date

Heading	Participant Comments
Do you agree with the 1 November 2023 effective date? If not, why not?	<p>PLUS ES does not think that the proposed effective date is achievable or practicable, for the following reasons:</p> <ul style="list-style-type: none">• The MC must be allowed an appropriate timeframe to review, re-engineer and operationalise their processes to align with the proposed automated process and subsequent changes to the procedures. In some instances this may require system enhancements.• The procedures have not been finalised.• The guideline is missing detail creating gaps in the user knowledge of the E2E process, in its current state.• The MC requires the ability to see and use the portal supporting the development of their internal operational documents such as work instructions.• In some instances MC may have to liaise with multiple MP stakeholders to bilaterally agree on processes.• Ideally this would require a 6-month timeframe. Since the industry still finds themselves in consultation, the publication of the final documentation will allow less than 4months to meet the effective date 1 Nov 2023.

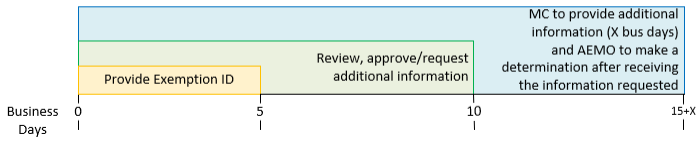
Heading	Participant Comments
	<ul style="list-style-type: none"> • If the effective date was to be extended, PLUS ES would recommend at a minimum a March 2024 date, as: <ul style="list-style-type: none"> ○ Dec and Jan are resource challenged months due to the Christmas Shut down period and personnel leave. ○ At least one month of preprod is required before Go-live, i.e. Feb.

3. Exemption Procedure (Metering Installation Malfunctions)

Section	Description	Participant Comments
1.4 Metering Exemption Framework	Added a new section to note that the procedure may change subject to the changes to the Metering Exemption Framework which might be made in the NER	
1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	Typo – in conjunction requires a space after in .
1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	The intention of the Metering Installation Exemption Guideline is to assist metering coordinators (MC) with the application and management of metering exemptions rather than to process the application.

Section	Description	Participant Comments
		<p>PLUS ES proposes to amend the wording from:</p> <p>...required to enable Metering Coordinators to <i>process the application</i> to</p> <p>...required to enable Metering Coordinators to <i>apply and manage their metering installation exemptions</i>.</p>
2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	PLUS ES for consistency recommends <i>metering installation exemption application</i> , replacing <i>meter exemption application</i> .
2.3	General	<p>PLUS ES recommends a review and re- write of this section taking into consideration:</p> <ul style="list-style-type: none"> • Detail which belongs in the procedure versus solution-based details which should be captured in the Metering Installation Exemption Guideline. • The validity and timing of some of the obligations now that the exemption ID fields will be visible in MSATS and/or the process has been automated including but not limited to the timeframes, provisioning of information etc.
2.3 AEMO's Determination (a)	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption process will be two steps process.</p>	<p>PLUS ES recommends that this clause is removed. This clause is redundant given that the action is no longer manual - the MSATS portal will be providing the Unique ID upon submission and validation and assumed almost real time once the NMI/s has been uploaded.</p> <p>Additionally, the timing of the provisioning of an Exemption ID is not clearly identified in any of the associated documents. Confirmation of the timeframe is required to support the MCs in developing their operational processes/instructions. This detail should be made available in the Metering Installation Exemption Guideline.</p>

Section	Description	Participant Comments
2.3 (a)(i)	Added clarification that the new automated exemption process will be two steps process.	<p>PLUS ES suggests the following:</p> <ul style="list-style-type: none"> • for clarity, exemption extension context should be in a standalone section rather than incorporated in other sections. • The additional detail provided would be best situated in the Metering Installation Exemption Guideline as it is detail relating to the automated solution.
2.3 (a)(ii)		<p>PLUS ES suggests the following:</p> <ul style="list-style-type: none"> • The additional details with respect to notification to other participants associated with the NMI should be in their own clause. • For clarity, it should also be noted that only approved exemption applications will be updated in MSATS. • To update MSATS with exemptions details one assumes the application is approved. Hence, we recommend that this detail should be included in section 2.5 Grant of Exemption.
2.3 (b)	Additional context added.	<p>PLUS ES recommends that the additional details should be removed from this procedure and captured in the Metering Installation Exemption Guideline, as it is detail relating to the automated solution.</p>
	Last paragraph referring to timeframes	<p>As this process is being automated via portal, PLUS ES recommends:</p> <ul style="list-style-type: none"> • Defining <i>receipt of an application</i> in context to the automated process • AEMO reviews the E2E timeframe with the proposed extended timeframes in this clause and considers the downstream impacts.

Section	Description	Participant Comments
		<p style="text-align: center;">Proposed Timeline</p>  <ul style="list-style-type: none"> ○ The 15+ business days timeline is additional to the period it takes the MC to determine the metering is malfunctioning and they need to apply for an exemption. Potentially a site could be malfunctioning for a period in excess of 5 weeks before an exemption is approved and communicated to participants associated to the NMI. For this reason, more timely market communications, PLUS ES recommends where practicable, AEMO reconsiders the existing and proposed timeframes in provisioning exemptions. ○ Type 1-3 meters: These sites have a greater focus and a shorter remediation timeframe (2 business days) compared to Type 4 metering due to their larger energy consumption and the potential impact to settlements. For market efficiency, PLUS ES recommends prioritising exemption applications for these sites for a faster turnaround and more timely market communication.
2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	<p>PLUS ES suggests the following for greater efficiency:</p> <ul style="list-style-type: none"> • Clarifying the commencement exemption date – Defining a date as <i>...whichever is the greater</i>, is left to open to interpretation.

Section	Description	Participant Comments
		<ul style="list-style-type: none"> • The commencement of the exemption date should be the date the MC became aware of the malfunction, as per the date required to be populated in the current manual or proposed new online application form. Any delays to the exemption commencement date due to administrative process tasks leaves the MC open to non-compliance and they will always be reporting sites that are in breach. • Exemptions granted on a conditional basis – whilst it is mentioned in the procedure further detail is required in the Metering Installation Exemption Guideline to assist the MC to develop their operational processes. That is, <ul style="list-style-type: none"> ○ The mechanism via which the conditions will be communicated to the MC. ○ Will the MC have to monitor or will a communication be provided to the MC. ○ If AEMO were to revoke the exemption: <ul style="list-style-type: none"> ▪ The mechanism to notify the MC. Will the MC have to monitor the status or will a communication be provided to the MC.
2.6 Application Unsuccessful	<p>deleted the following point:</p> <p>(a) A failure to complete the application form;</p>	
2.7 Extension to Exemption	<p>Deleted reference to Appendix B.</p> <p>Added a new section about AEMO’s notification of expiring exemptions and the process of extension.</p>	<p>PLUS ES suggests that new section does not belong in the Procedure. The detail is applicable in the Metering Installation Exemption Guideline.</p> <p>Feedback for the additional information:</p>

Section	Description	Participant Comments
		<ul style="list-style-type: none"> • 14 business days timeframe – Due to the potential downstream impacts on the exemption application, PLUS ES recommends that the timeframe is at least 20 bus days. This would also facilitate use cases where the MC is non transactional and needs to liaise with the MP to decide whether an extension is required. • Closed Status – <ul style="list-style-type: none"> ○ Further clarification is required with the timing details of actions with respect to submitting an extension (Noting the details should reside in the Metering Installation Exemption Guideline): <ul style="list-style-type: none"> ▪ The timing where the exemption will be closed. E.g the business day following the expiry date? When would one expect the data to be removed from MSATS? ▪ A submitted extension application has not been actioned by the expiry date, will that trigger the exemption to be closed? If so, the AEMO notification timeframe of pending exemption expirations needs to be extended accordingly.
2.8 Current MC’s Obligations during the Exemption Period	Clause (b)	<p>PLUS ES supports the removal of this clause due to the new solution and the availability of the information in MSATS:</p> <ul style="list-style-type: none"> • PLUS ES recalls in the MSDR workshops that participants lobbied to have the exemption ID and expiry date in MSATS to drive operational efficiencies and market communications. The CR notifications to all affected participants will deliver the information.

Section	Description	Participant Comments
		<ul style="list-style-type: none"> • The exemption process has been implemented for 5+ years. What may have been appropriate for the introduction of small customer meter contestability does not necessarily mean it remains efficient with current knowledge and newly proposed processes. • It is our understanding that other affected participants do not use/refer to that information. There is an opportunity with an automated process to reduce administrative 'noise'. For large sites, if a Retailer requires that information, they could always request it from the MC. • The NER only requires the MP rectification plan to be provided to AEMO.
	<p>Clause (d)</p>	<p>PLUS ES proposes that the clause is reworded to only obligate the MC to keep AEMO informed of any changes. That is, remove the obligation to keep other participants informed and provide them a copy of the MP rectification plan.</p> <ul style="list-style-type: none"> • The exemption process has been implemented for 5+ years. What may have been appropriate for the introduction of small customer meter contestability does not necessarily mean it remains efficient with current knowledge and newly proposed processes. • It is our understanding that other affected participants do not use/refer to that information. There is an opportunity with an automated process to reduce administrative 'noise'. For large sites, if a Retailer requires that information, they could always request it from the MC. • The NER only requires the MP rectification plan to be provided to AEMO.

Section	Description	Participant Comments
	Clause (e)	<p>PLUS ES suggests that the clause is reworded to align the obligation with the proposed new automated process via MSATS. i.e. the MC must update the status of the NMI when the metering installation malfunction has been rectified.</p> <p>By updating the status of the NMI/Exemption ID in MSATS portal the system will trigger an update in the associated MSATS fields. AEMO and all affected participants will be notified.</p>
	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	<p>PLUS ES proposes for efficiency, the removal of the MC obligation in its entirety:</p> <ul style="list-style-type: none"> • Exemptions are not transferrable between MCs • The MC has a relationship with the MP and could always request the information/MP rectification plan if required. • The incoming MC may not decide to keep the MP and the reasons supporting the original exemption may not be applicable. • For market efficient practices, AEMO to extend the MC Churn report to be provided to both MC recipients - the 'old' and the 'new' MC. The old MC will not have to notify the new MC.
2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	PLUS ES suggests that the additional paragraph with respect to closed status is removed from the procedure. It is information which belongs in the Metering Installation Exemption Guideline as it refers to the automated process.
2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	PLUS ES recommends that the additional section is removed from the procedure and made available in the Metering Installation Exemption Guideline as it refers to the automated process (the solution rather than the procedure).

Section	Description	Participant Comments
2.11	Revocation of Exemption	<p>PLUS ES recommends modifying the clause to reflect the metering installation exemption automation process and its benefits by deleting the last part of the section ...whereupon the Current MC must notify all affected Participants of the revocation within one <i>business day</i>.</p> <p>Whilst not clear in the Metering Installation Exemption Guideline, one assumes AEMO would change the exemption status from active to a status to reflect the revocation of the exemption. This would trigger the details to be removed from MSATS. The MSATS update and the CR notification to affected participant will satisfy this condition.</p>
3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	<p>PLUS ES understands the potential reasoning of the inclusion but question what additional value this would deliver, that is not provided today via current obligations and market requirements.</p> <ul style="list-style-type: none"> • The MDP's actions are governed by the MDP SLP and Metrology Part B procedures. • The information is communicated in the daily NEM 12/13 files. • In MC churn scenarios the MC may not have a relationship with the MDP as in the case of legacy metering. • There is no reciprocal NER obligation. <p>PLUS ES believes that the inclusion increases administrative effort for both the MC and the AEMO resources, for no additional value to the market and hence suggest the MDP action plan clause should be removed.</p>
3.2 Contents	Added a new section on the MDP action plan	<p>PLUS ES believes that the inclusion increases administrative effort for no additional value to the market and hence suggest the MDP action plan clause should be removed.</p>

Section	Description	Participant Comments
		<ul style="list-style-type: none"> • The MDP's actions are governed by the MDP SLP and Metrology Part B procedures. • The substitution/estimation information requested in the MDP action plan is available and communicated in the daily NEM 12/13 files. • Not all malfunctioning metering installations require data to be substituted. • In MC churn scenarios the MC may not have a relationship with the MDP as in the case of legacy metering. • There is no reciprocal NER obligation.
Appendix A. Application for Exemption	Deleted Appendix A	
Appendix B. Application for Extension	Deleted Appendix B	

4. Metering Exemption (Small Customer Metering Installation)

Section	Description	Participant Comments
1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in	Typo – in conjunction requires a space after in .

Section	Description	Participant Comments
	conjunction with the new Metering Exemption Guideline	
2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	
2.2.2 Expiry		PLUS ES recommends that clause (b) is amended to ensure consistent remote acquisition is established. (Where consistent needs to be defined).
3.2 Form of Application	Updated section to reflect the new automated exemption process	
3.4	Timing of Application	<p>PLUS ES recommends a review of the clause and appropriate modifications made to capture most use cases in which the MC may be required and can apply for an exemption.</p> <ul style="list-style-type: none"> No later than 30 bus days post metering installation – whilst in most cases this may be efficient, there are use cases where 30 bus days is not sufficient timeframe for the MP to exhaust all remedies to establish remote communications. Examples of use cases where remote acquisition capability remediation may exceed 30 bus days: access issues, permissions from strata groups, sourcing of equipment etc. <p>For the MC and AEMO’s efficiencies, PLUS ES recommends the timeframe is extended to 60 business days. Especially as MC and MDP obligations/practices have evolved since these procedures were implemented.</p> <ul style="list-style-type: none"> The current scope and wording do not support an exemption application where an established remote communicating metering installation ceases to communicate due

Section	Description	Participant Comments
		to environmental or physical conditions post 30 business days after installation, such as the telecommunications service provider relocating their infrastructure and creating a <i>dead zone</i> .
3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	<p>Clause (c):</p> <p>PLUS ES recommends that the additional information should be in the Metering Installation Exemption Guideline as it is pertinent to the solution and not the procedure.</p> <p>Additionally, the included paragraph mentions a status of More Data, but the Metering Installation Exemption Guideline notes a status code of More Info. We recommend an alignment of the stated status and the automated process available codes.</p>
3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	<p>PLUS ES recommends:</p> <ul style="list-style-type: none"> • Clause (b) be modified so that the commencement exemption date is the 'Date first aware of the issue'. This information is requested in the application form and should be used. Any date other than the metering installation date or the 'Date first aware of the issue' leaves the MC exposed to non-compliance, especially with conditional administrative requirements such as receipt of supporting documentation. • The conjunction between clause (a) and (b) to be amended from 'and' to 'or' as only one date can apply. • Commencement dates to be succinctly defined: for example, the definition of <i>..whichever is the greater</i>, is left to open to interpretation.
3.7 Current MC's Obligations during	Clause (a)	PLUS ES questions the value/validity of this clause with the new automated process.

Section	Description	Participant Comments
the Exemption Period		<p>The MC will become aware of the telecommunications network enabling remote access when their metering installation starts communicating. The MC would then update the status of the exemption as resolved irrespective of the timeline of the exemption period. Additionally update the Meter Type Installation from MRAM to Comms 4X. AEMO has access to the output/information of both activities.</p> <p>PLUS ES recommends for efficiency the clause it deleted.</p>
	<p>Added new point 3.7(c) to advise that exemptions can't be extended.</p>	<p>PLUS ES requests clarification with respect to clause (b) (<i>there is no clause (c)</i>) and section 2.2.1 second paragraph which refers to requiring an exemption period greater than the current exemption period.</p> <p>Section 2.2.1 requires the MC to submit all paperwork 15 business days prior to the expiry date and section 3.7 Clause (b) calls for an application of a new exemption of a minimum of 30 business days.</p> <p>PLUS ES recommends a standardisation of timeframes between the two clauses. Especially, the intent is to submit a new application to gain an additional exemption period.</p>
4.1 Exemption Personal to Metering Co-ordinator		<p>PLUS ES suggests adding clarification that says the Exemption for a metering installation following an MC churn will be <u>closed</u> and the new MC will be required to submit a new application if the exemption is still required within X business days. The effective date of the exemption will be the date of the MC churn date.</p> <p>If the proposed is applied section 4.2 is no longer required and can be deleted.</p>
4.2 Application for Exemption if No	<p>Updated section to reflect the new automated exemption process</p>	<p>PLUS ES recommends that this clause is deleted, supported by the following reasoning:</p>

Section	Description	Participant Comments
Change in Circumstances	Clause (a)	<ul style="list-style-type: none"> AEMO according to the Metering Installation Exemption Guideline will be providing a SDQ check for Meter Exemption MC Churns – so there is no additional value for the MC to continue with this obligation, as AEMO is aware of the MC churn.
	Clause (b)	<p>PLUS ES has the following comments:</p> <ul style="list-style-type: none"> How the new MC will know an exemption has been approved and need to continue with the exemption for a metering installation, since the information will not be available in MSATS for the no network coverage exemptions. This notification could be provided to the new MC via the ME MC Churn SDQ check In some cases, a metering installation which was required to be exempt for one MC may not be a requirement for another. 5 bus days is not sufficient for an MC to determine to submit an exemption especially if the MC decides to churn the metering provider. The value of providing a statutory declaration especially when the new MC needs to submit a new exemption application and the MP has not changed. <p>For the reasons above and the feedback we provided against section 4.1, PLUS ES recommends the clause is removed.</p>
4.3 Change in Circumstances	Deleted reference to Appendix A	<p>PLUS ES suggests either rewording the section for succinctness and intent or removing it entirely. The confusion comes from the <u>undefined</u> change in circumstances and the conditional requirement of the New MC applying for an exemption. There could be a change of circumstances and the MC is the <u>current</u> MC as per our feedback in section 3.4.</p>

Section	Description	Participant Comments
Appendix A. Application for Exemption	Deleted Appendix A	

5. Metering Installation Exemption Guideline (New Document)

Section	Participant Comments
1.1	The Guideline supplements the Metering NEM Exemption Procedure . PLUS ES recommends either naming the individual Procedures or amending the word Procedure to Procedures – to maintain generic referencing and indicate there is more than one Procedure.
3. Application process	
3.1 Generally	
3.2 Responsibility	
3.3 Supporting Information to support Application	PLUS ES recommends the following amendments for clarity: <ul style="list-style-type: none"> ...once raised and when required, the Current MC must provide via email supporting information ...
Two step process	PLUS ES has concern that this proposed process now adds additional process steps from the MCs perspective. Where it is currently one email including all the supporting documentation required, now the MC needs to raise the request in MSATS and then wait for an exemption ID to trigger an email with supporting information.

Section	Participant Comments
	<p>It also potentially requires AEMO staff to consolidate the online application with emails to complete the assessment.</p> <p>We recommend that AEMO reviews the automated solution and propose a more efficient process to allow participants to complete and manage exemption applications via the one mechanism.</p>
4. Creation and Management of an Application	
4.1 Exemption life cycle	
4.2 Navigation to exemptions	
4.3 Exemption list	<ul style="list-style-type: none"> • PLUS ES has not been able to determine if entering the NMI in the NMI search parameter will return the status of the NMI or the exemption ID which contains the NMI. <p>The MC must have the ability to view single NMI status in the Exemption Window. That is, not required to drill into the exemption ID and download a CSV list of potential numerous NMIs associated with an individual Exemption ID.</p> <ul style="list-style-type: none"> • PLUS ES supports that the ability to identify the exemption type in the exemption window will be extremely beneficial to the MC in managing their exemptions. i.e. being able to tell if it is a malfunction vs Type 4a exemption.
4.4 Creating a new exemption	<p>PLUS ES recommends that a definition of the Comments Action Reason section is required to inform the user how this section is to be used and who will be using it.</p> <p>We also seek clarification at what stage will the exemption ID number be visible to the user. We are assuming that creating an exemption also creates the exemption ID. Hence we recommend that it is clarified in the paragraph: On completion of populating ...</p>
4.4.1	<p>Substitution Required Field:</p> <p>PLUS ES is seeking clarification on the requirements in populating the field.</p>

Section	Participant Comments
	<ul style="list-style-type: none"> This field has been identified as Mandatory. What if the detail is not available? That is, what if meter does not belong to a MP/MDP which has a commercial arrangement with the MC (scenarios of MC churn). The screen shot for diagram 5 show that the field is a 'check' box format. How is a mandatory field managed via a single check box? It is not clear what the intent of footnote (3) is (against the Substitution Required field).
	<p>NMI Validation: NMI is included in another active exemption ID.</p> <p>PLUS ES has concerns this validation will constrain the MC's ability to raise exemptions as required.</p> <p>Use case: the MC has raised an exemption against a NMI which has a CT and VT. The exemption has been raised because the CT has failed. Before the Malfunction can be resolved the VT malfunctions. According to the validation the MC will not be able to raise an exemption for the VT component as the system will reject it. Whilst these occurrences are few they still exist and will create a break point in the process.</p>
4.4.2	<p>Footnote 4: see PLUS ES comments with respect to the Twostep process.</p>
4.5 Reviewing an exemption	<p>Additional information to be included to clarify the below:</p> <ul style="list-style-type: none"> When the exemption is in the 'For Review' Status the exemption details cannot be changed or updated. What is the process the MC should follow to update the exemption whilst in Review? i.e. cancel the exemption to reapply with updated information or do they have to wait for the status to be changed by AEMO? Note the table 5.1.4 notes the exemption status code as Review not For Review Foot note 5: how will the MC be notified if AEMO update the end date and at what stage will AEMO be updating the end date. Only at approval?

Section	Participant Comments
	<ul style="list-style-type: none"> • Typo - Depending on the Exemption category value the following processed will be performed. Amend the word processed to processes. • Foot note 6: What is the process to include additional enumerations? Will participants be able to request them? • What is the timeframe from when the exemption is approved to when MSATS is updated? • Type 4A SDQ check – <ul style="list-style-type: none"> ○ will this be in addition to the approval status in the exemption portal? Noting that the solution does not provide the MC the ability to view the exemption type (malfunction or Type 4a) from the exemption window or to sort by it (highly desirable and beneficial) for efficient monitoring and management. ○ PLUS ES recommends the delivery date of the SDQ is on a specific date of the week.
4.6 Providing more information	<ul style="list-style-type: none"> • Foot note 7 – review and amend for grammar. • This section notes status code of More Data. Table 5.1.4 has a code of More Info.
4.6.1	<p>PLUS ES seeks clarifications on the following:</p> <ul style="list-style-type: none"> • Clause 1(a): Does the action remove the NMI from the list of NMIs or set the status of the NMI to removed? • Clause 1(b): Typo – amend the word selection to select. • Cause 2(a): if the exemption cannot be updated whilst in Review and not after it has been approved does this mean additional NMIs can be uploaded when the exemption status is only NEW. If this determination is correct then the clause should be amended to note the correct exemption status code to remove ambiguity or misinterpretation. • any NMIs that fail validation will be excluded from the exemption. Assume that the status of the NMI will be set to rejected rather than the NMI be excluded. • When a NMI is rejected will the reason why it failed validation be provided and where?

Section	Participant Comments
4.7 Managing an exemption	<ul style="list-style-type: none"> Diagram 12 – shows the exemption as rejected but the left-hand pane has the status as active. Is this a viable scenario or it is an erroneous example. If the later, may AEMO provide clarification details.
4.7.1	<ul style="list-style-type: none"> Following Diagram 14 – mention is made of an exemption action button. None of the screen shots show the exemption action button. Recommend either the correct name of the button is used or a screen shot is included. Further clarification is required with the following sentence: Once updates to the all NMI details have been completed, selection of the Save changes button will process the exemption changes. As this is not under the NMI update section.
4.7.2	<p>PLUS ES seeks clarification on the following:</p> <ul style="list-style-type: none"> What happens to submitted extensions which have not been actioned by AEMO before the expiry date, i.e inflight extension requests. 14 days: there appears to be a misalignment of days and business days between this guideline and the procedures. PLUS ES recommends that the timeframe is bus days and that the timeframe is extended to 20 bus days at a minimum to allow the MC to complete the review and submit the request before it expires. (As per our feedback against the procedures)
4.7.3	<p>PLUS ES recommends that:</p> <ul style="list-style-type: none"> The MC churn report is also to be provided to the new MC as a notification process that there is a exemption on that NMI. What happens to the NMI status of MC Churn, if the exemption code is set to cancelled or resolved? Does it change or remain? Last paragraph ...If the New MC... see PLUS ES feedback’s related to the procedure. <ul style="list-style-type: none"> The process also requires clarification as it is not quite clear what the old MC needs to do, vs AEMO vs the new MC. i.e if the new MC has to raise a new application, who changes the status to MC churn? Is this status then treated as closed which should not prevent the new MC raising an exemption against the NMI. <ul style="list-style-type: none"> If NMI validation looks for the same NMI in multiple exemptions, does it validate against the participant ID. i.e. an exemption exists for the NMI with MC (A) and MC(B), the new MC, wants to raise an exemption against the same NMI.

Section	Participant Comments
	<ul style="list-style-type: none"> ○ PLUS ES also questions the validity of a statutory declaration and if the 5 business provides enough of a timeframe. Doesn't the MC have 15 bus days to apply for an exemption from when they are notified? (As per our feedback against the relevant procedures)
4.8 Viewing closed exemptions	<ul style="list-style-type: none"> ● Does the MC have the ability to download a NMI list from a closed exemption?
4.9 Exemption notifications	<ul style="list-style-type: none"> ● There is more value in knowing how many NMIs still remain active in a report than the NMI QT of the individual exemption. ● ME_EXPIRE_SOON: PLUS ES recommends that the frequency aligns with the requirements of the procedure. <ul style="list-style-type: none"> ○ The procedure calls for 14 business days ○ The small customer procedure calls for submitting a new application 3 months in advance ○ This report should be provided at a more frequent rate, such as daily, if the MC is to have sufficient time to review and apply for an extension or submit a new application before the expiry date. ● PLUS ES recommends that a report is also developed and provided for the T4A exemption expiration report. The timelines and frequency should align with the procedure requirements. ● ME_MC_CHURN: this should also be provided to the new MC. ● The last 2 paragraphs with respect to CR notifications: needs to be made clear that it is only applicable to Malfunction type exemptions.
4.10 Transition of existing exemptions	<p>PLUS ES seeks further detail/clarification with respect to the scope of transitioning existing exemptions. Does the transitioning of exemptions includes loading them in the portal or just loading the exemption ID and expiry date in MSATS.</p>
4.11 CSV formats	

Section	Participant Comments
4.12 API Navigation	
5.1.2 Exemption codes	<ul style="list-style-type: none"> • Shared fuse: PLUS ES suggests this is a nature of an exemption and not a type of exemption, similar to access issues and should be moved to table 5.1.3. • No network telecoms network: we believe the options for this should be no telecoms network and Environ. The alternative telecoms network could fit into the generic telecoms network.
5.1.3 Nature of exemption	<p>PLUS ES recommend:</p> <ul style="list-style-type: none"> • Adding the shared fuse against the parent Types: Defective and Family <ul style="list-style-type: none"> ○ Adding an additional code of MC admin to cater for situations that the sites have not been visited but an exemption has been requested to meet the 15 business days rules obligation. i.e resourcing/scheduling • Removing the Parent Type shared fuse as per comments for section 5.1.3 • Removing the Parent type of NOALTNWK as per comments in section 5.1.2 • Removing all the codes for the 4A Parent types Environ and NOPUBNTWK. If there is no coverage it is either due to the environment or the telecommunications network and any other sub reason is irrelevant or not applicable. Unlike Malfunctioning meters.
5.1.4 Exemption status code	<p>PLUS ES recommends the following:</p> <ul style="list-style-type: none"> • Providing some clarifying detail in the description column in place of copying the codes i.e. active = approved, review = validated and AEMO reviewing etc
5.1.5 Exemption NMI Status Codes	<p>PLUS ES recommends the following:</p> <ul style="list-style-type: none"> • Providing some clarifying detail in the description column in place of copying the codes i.e. active = approved, review = validated and AEMO reviewing etc

Section	Participant Comments
	<ul style="list-style-type: none"> When does one use the codes cancelled vs removed?
6.0	For the Note section: and Type 1-4 (large), as per feedback provided in the associated procedure, PLUS ES recommends that the MDP action plan should not be required.

6. Retail Electricity Market Procedures – Glossary and Framework

Section	Description	Participant Comments
4.4.5 Metering Installation Exemption Guideline	Added new Metering Installation Exemption Guideline document	