

METERING INSTALLATION EXEMPTION AUTOMATION CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: United Energy

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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>United Energy is supportive of a November 2023 effective date but strongly recommend not having mid-week go-lives, where system go-lives are on Sunday and procedural go-lives are mid-week.</p> <p>United Energy strongly recommends a weekend go-live and procedural effective date from Monday.</p>

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	No comment
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	No comment
2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	No comment
2.3 AEMO's Determination	<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>United Energy would like clarification on Section 2.3 (a) (ii). The Guideline section 4.5 and 4.9 outline that a CR5101 will be received once the CR completes. Can clarification be sought on what is contained in this CR5101 i.e. does it only contain the Meter Malfunction Exemption fields?</p>
2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	No comment
2.6 Application Unsuccessful	deleted the following point:	No comment

Section	Description	Participant Comments
	(a) A failure to complete the application form;	
2.7 Extension to Exemption	Deleted reference to Appendix B. Added a new section about AEMO's notification of expiring exemptions and the process of extension.	No comment
2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	No comment
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	No comment
2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	No comment
3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	No comment
3.2 Contents	Added a new section on the MDP action plan	United Energy supports the MDP action plan.

Section	Description	Participant Comments
Appendix A. Application for Exemption	Deleted Appendix A	No comment
Appendix B. Application for Extension	Deleted Appendix B	No comment

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 conjunction with the new Metering Exemption Guideline	<p>United Energy comments below reference Section 1.1:</p> <p>In 2017 in response to the introduction of the Power of Choice Metering Competition Rule change, the Victorian Government chose to extend indefinitely its AMI Mandate for the exclusive provision of small customer metering at “relevant metering installations” within the state of Victoria (that previously existed under a NER Chapter 9 Derogation) through specific changes to the NER legislation in Victoria through a series of gazetted Orders-in-Council.</p> <p>Under those OiC’s issued by the Victorian Government, the Victorian NER Chapter 7 specifically exclude the requirements of 7.8.3 and 7.8.4 in relation to the LNSP “relevant metering installations” (i.e. AMI Metering) within Victoria.</p>

Section	Description	Participant Comments
		<p>Modification of new Chapter 7 – Clauses 7.8.3 and 7.8.4 disapplied in respect of relevant metering installations:</p> <ol style="list-style-type: none"> 1. <i>After clause 7.8.3(c) insert: ‘(d) This clause 7.8.3 does not apply in Victoria in respect of relevant metering installations.’</i> 2. <i>After clause 7.8.4(i) insert: ‘(j) This clause 7.8.4 does not apply in Victoria in respect of relevant metering installations.’</i> <p>Consequently it is United Energy’s view that AEMO Small Customer Exemption requirements also do not apply to the Victorian Distributor’s “relevant metering installations” i.e. Victorian AMI Metering.</p>
2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	No comment
3.2 Form of Application	Updated section to reflect the new automated exemption process	No comment
3.5 AEMO’s Determination	Updated section to reflect the new automated exemption process	No comment
3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	No comment
3.7 Current MC’s Obligations during the Exemption Period	Added new point 3.7(c) to advise that exemptions can’t be extended.	No comment

Section	Description	Participant Comments
4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	No comment
4.3 Change in Circumstances	Deleted reference to Appendix A	No comment
Appendix A. Application for Exemption	Deleted Appendix A	No comment

5. Metering Installation Exemption Guideline (New Document)

Section	Participant Comments
3. Application process	
3.1 Generally	No comment
3.2 Responsibility	No comment
3.3 Supporting Information to support Application	No comment
4. Creation and Management of an Application	

Section	Participant Comments
4.1 Exemption life cycle	No comment
4.2 Navigation to exemptions	No comment
4.3 Exemption list	No comment
4.4 Creating a new exemption	No comment
4.5 Reviewing an exemption	United Energy would like clarification on what is contained in this CR5101 i.e. does it only contain the Meter Malfunction Exemption fields or will other fields be present?
4.6 Providing more information	No comment
4.7 Managing an exemption	No comment
4.8 Viewing closed exemptions	No comment
4.9 Exemption notifications	<p>United Energy would like clarification on the paragraph relating to <i>“Upon resolution or cancellation of an exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101 has completed. This notification will remove the exemption number and expiry date.”</i></p> <p>Does this indicate nulls or blanks in the relevant exemption fields? Will the meter exemption fields be the only fields present?</p>

Section	Participant Comments
4.10 Transition of existing exemptions	No comment
4.11 CSV formats	No comment
4.12 API Navigation	No comment

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	No comment