

(Note: references to section numbers in the AEMO RESPONSE column are references to the Draft Report and Determination)

Table 6 – MSATS Procedures: CATS

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
1.	Ausgrid	0	General	There are many obligations within the procedures where it specifically states (for example) “the MC must ...”. If it is proposed such obligations might be delivered by other parties, then the wording within the procedures should be changed to “the MC must ensure” to allow sufficient flexibility in other procedures to allow the obligation to be delivered by another party (albeit leaving the fulfilment of the obligation with the MC).			Agreed. AEMO has already done that in most cases, however we will review the document and apply the change if it has been missed in some sections.
2.	Energex	0	General Comment	Consideration should be given to modifying the current CATS 3XXX series to include final readings from the new MPB from the meters removed (i.e. type 6 to type 4).			Refer to section 4.67
3.	AusNet Services	0	General comments	AusNet Services believes the objection period of 1 day for change requests is not long enough. It does not allow for non NEM public holidays. For example in Victoria if a change request was raised on Melbourne Cup Day by an interstate participant the Victorian participant will not have enough time to object to the change request as the logging period would be over before they would have returned to work the next business day. AusNet Services suggest that the objection logging period should be 2 business days. This will provide an adequate timeframe to cover non NEM public holidays.			Refer to section 4.78
4.	Pacific Hydro	0	General comments	Both ‘days’ and ‘business days’ are used in the procedures. Where ‘calendar days’ was used, ‘calendar’ has been struck out. Can there be a consistent use of ‘days’ and whether they are calendar or business.			Business day and day are both defined in the National Electricity Rules. Day is defined as the 24 hour period beginning and ending at midnight Eastern Standard Time (EST) and is therefore calendar days. ‘Day’ will be italicised to make it clear.
5.	Red Lumo	0	General Comments	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
6.	Pacific Hydro		QUICK REFERENCE GUIDE	Notes: EN: Embedded Network, ENC: Embedded Network Child NMI, ENP: Embedded Network Parent NMI. Why remove the ‘Embedded Network’? It explains the abbreviation. Suggest removing ‘NMI’ as this is referenced in the transactions above.			The reason for deleting “Embedded Network” is because there are now new defined terms in the National Electricity Rules to refer to parent connection points and child connection points.
7.	AusNet Services		QUICK REFERENCE GUIDE	AusNet Services believe CR 6421 should either remain as is or change to Child NMI as this is defined in the glossary. The heading for this CR has not been change and is still the old heading.			Agreed.
8.	Red Lumo		QUICK REFERENCE GUIDE	Suggestion is for Change Requests (CRs) that will no longer be used should not be removed from this table. Recommend that these are ‘end dated’ with the reason for not using these from 1 December 2017. ++++++ Inclusion of the following within the Glossary Notes: EN: Embedded Network, ENC: Child NMI, ENP: Parent NMI			Agreed The codes EN, ENC & ENP are not used in the text so they don’t need to be in the Glossary.
9.	Ausgrid		HOW TO USE THIS DOCUMENT	Picture needs to be updated to ‘Section’ instead of ‘Chapter’ to be consistent with all other changes.			The Picture will be deleted as the Table of Contents provide same details as the picture.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

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				'Chapter' still exists in various parts of the document and needs to be updated to 'Section'.			Agreed.
10.	Red Lumo	1.2	DEFINITIONS AND INTERPRETATION	Recommendation for inclusion of the following for any words/terms that are italicised: Italicised words and phrases which are defined in the National Electricity Rules have the same meaning within this Procedure.			The Glossary and Framework confirms that italicised terms used in Procedures have the same meanings given to those terms in the NER and clause 1.2 of MSATS already says that the Glossary and Framework is incorporated into the MSTAS procedures and should be read with the MSATS procedures.
11.	Vector AMS	1.4	RELATED DOCUMENTS	Format 'metrology procedure' as a document name, not a defined NER term. Add SLP - MP as a related document. MPs have CATS obligations too.			We will refer to Metrology Part A, Metrology Part B, and MDM procedure in the relevant documents There is no reference to Meter Provider Service Level Procedures in the CATS Procedures, hence its absence.
12.	AGL Active Stream	1.4	RELATED DOCUMENTS	Check related documents - e.g. MP SLP should be included Insert the full names of documents MP SLP should be included, they also have CATS obligations			There is no reference to Meter Provider Service Level Procedures in the CATS Procedures, hence its absence. Agreed
13.	United Energy	1.4	RELATED DOCUMENTS	Incomplete			Agreed.
14.	AusNet Services	1.4	RELATED DOCUMENTS	AusNet Services believe this document is incorrectly named: MSATS User Reference Interface Guide			Agreed.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

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15.	Ausgrid Endeavour Energy Pacific Hydro Active Stream Ausnet Services	2.1(e)	GENERAL OBLIGATIONS	<p>Delete the example. This is not consistent with the remainder of the document.</p> <p>Procedural improvement: Clause 2.1.e has an example that is redundant. We would suggest rewording to 'A Participant must not use an Objection Code unless the Objection is fair and reasonable. The Participant who made the Objection must be able to produce evidence upon request to substantiate it.'</p> <p>Suggest the following rewording: (e) A CATS Participant must not select an the Objection Code which applies to the reason for objection and must be able to produce evidence, upon request, to substantiate the use of an Objection Code. unless the Objection is fair and reasonable. (f)(e) A CATS Participant must not submit information to the MSATS system which cannot be demonstrated, when requested in accordance with the CATS Procedures enforcement process, that the information reasonably represents a business practice of that CATS Participant. For example, when an Objection is made using a specific Objection Code, the Participant who made the Objection must be able to produce evidence upon request to substantiate it.</p> <p>(e) change "use an objection code" to "raise an objection"</p> <p>AusNet Service believes this clause is incomplete and does not make any sense.</p>			<p>The example is just a rewording of deleted para (f) and is consistent with it.</p> <p>Agreed.</p>
16.	Origin Pacific Hydro	2.1(f)	GENERAL OBLIGATIONS	<p>Participants must ensure use best endeavours to ensure that the transfer of a <i>NMI</i> from one FRMP to another FRMP is not delayed.</p> <p>#number of factors that could delay a transfer outside the control of the FRMP – such as customer refusing access for a read would delay a transfer.</p> <p>(g) (f) CATS Participants must use their best endeavours to comply with their obligations contained in these CATS Procedures to ensure that the transfer of a connection point <i>NMI</i> from one FRMP to another FRMP is not delayed, acknowledging the legitimate use of Objection Codes which can impact the progress of the NMI transfer.</p>			<p>(f) AEMO does not agree with the suggestion as the change is not required to meet the objective that Origin is proposing.</p>
17.	Origin	2.1(h)	GENERAL OBLIGATIONS	<p>Unless a different timeframe is specified in these Procedures, a Participant must update the CATS Standing Data within 210</p>			<p>AEMO needs to understand why there is a compelling case for this to occur.</p>

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	AGL Red/Lumo			<p><i>business days</i> of becoming aware that it is no longer current or relevant.</p> <p>Is 20 b/days acceptable in the new environment ?</p> <p>(h) Unless a different timeframe is specified in these Procedures, a Participant must update the CATS Standing Data within 20 <i>business days</i> of becoming aware that it is no longer current or relevant</p> <p>Suggestion is for the timeframe to be changed from 20 to 10 business days</p>			
18.	Ausgrid Endeavour Energy AGL Active Stream Red/Lumo	2.1(i)	GENERAL OBLIGATIONS	<p>'reasonable time' is not a defined period and should not occur in the procedures.</p> <p>Procedural improvement: Clause 2.1.i is ambiguous. We would suggest that words 'reasonable time' be replaced with a specific SLA</p> <p>Participants must respond to a Data Request from MSATS by initiating a Change Request containing the requested information within a reasonable time. 5 business days</p> <p>Need a defined time frame to understand what a reasonable timeframe is.</p> <p>seems meaningless without specified timeframes. Furthermore, there is more to the response timeframe than just when the data request was received. E.g. for a 6800, the proposed date must also have been reached and the new MP must have installed their metering.</p> <p>(i) Participants must respond to a Data Request from MSATS by initiating a Change Request containing the requested information within a reasonable time.</p> <p>This is a new obligation; the definition of Data Request as per the glossary is 'A request initiated by MSATS and sent to a Participant at the Pending Validation point of the Change Request life cycle'</p> <p>The statement does not make sense, please provide clarification, and a timeframe is to be assigned.</p>			(i) will be deleted as timeframes are specified where required in the document
19.	AGL	2.1	GENERAL OBLIGATIONS	<p>P26 Definition Is Participant being used as a generic term or a defined term ?</p>			Participant is defined in the Glossary
20.	AGL			<p>P26 – clause (e) A party raises an objection Clause (e) should be a sub-point of clause (d) as it specifically relates to Objections – specified in (d)</p>			2.1 (d) and (e) are not related and deal with different obligations, however the confusion might have caused by the formatted dot point, this will be fixed.
21.	AGL	2.1(l)	GENERAL OBLIGATIONS	<p>P26 – clause (l) (struck out) Maintain clause</p>			AEMO considers that the time to complete obligations is clear within the procedures

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	AusNet Services			There is no reference to system data inputs up to 11.59 pm etc. AusNet Services believes this clause should be retained as it provides clarity around how the MSATS system operates. This would be particularly useful for new entrant			
22.	United Energy	2.1	GENERAL OBLIGATIONS	Suggest rewording			The comment is too vague for response.
23.	AusNet Services	2.1	GENERAL OBLIGATIONS	AusNet Services believes that a general obligation around objections should be included since it has been removed from the specific role obligations. Wording could be something like this: A Participant may object to a change request by using a valid objection code and adhering to objection rules as per objection rules table for each change request.			See sections 4.67 & 4.78
24.	Origin Pacific Hydro	2.2(a)	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	Nominate a Appoint an MDP and the Metering Coordinator(RP) in accordance with the Rules. #Doesn't appear to be another obligations with Procedure where the FRMP has the obligation to nominate an MC Initiate a Change Request for the transfer of a <i>NMI</i> in accordance with the applicable Timeframe Rules Jurisdictional rules . Subject to the retrospective and prospective periods in MSATS, the New FRMP must initiate the transfer: 1. Having the mandatory information required to initiate a valid transfer in MSATS,; and 2. No later than two <i>business days</i> after the conclusion of the Cooling-Off Period, as required by the relevant jurisdiction ; 3. Following a request for field work to be performed at the Connection Point by the LNSP RP or MP, the transfer is raised in accordance with 1 and 2 above. The Jurisdictional rules as they apply to the transfer of a NMI are not the same as the Time Frame rules in the procedures. The Jurisdictional rules determine whether the transfer can be done in the cooling off period or must be issued after the cooling off period has ended. Suggest re-instating the reference to Jurisdictional rules. 2.2(b) (a)3. was designed to allow retailers to wait for special read and reconnection service order responses to be returned to confirm the actual read date prior to the transfer request being submitted. This could be more than two days after the cooling off period. Suggest this clause be re-instated.			Agreed. AEMO considers that section 4.6 covers the Jurisdictional rules. AEMO does not see the text as necessary in point 3 as points 1 and 2 are sufficient
25.	United Energy	2.2(r)	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	What is the LNSP expected to do with this information?			Para (r) does not mention the LNSP. This is a FRMP obligation. AEMO does not understand the question.

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26.	Ausgrid	2.2(s)	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	<p>Ausgrid believe that clause (s) should be removed from the document. The MC should be solely responsible for advising the LNSP and the FRMP upon completion of a remote disconnect or reconnect. Two parties must not have the same obligation. The MC has this obligation in 2.7.(c)</p> <p>Ausgrid request that a new clause is added against the New FRMP.</p> <p>(..new) Inform the LNSP when a <i>connection point</i> is to be remotely disconnected or remotely reconnected prior to the work being performed. Further to this point the remote disconnection and reconnection needs to be identifiable at a meter level, not the connection point.</p> <p>The above clause is required to ensure Ausgrid does not reconnect a site that has been remotely disconnected when Ausgrid is contacted directly by the customer.</p> <p>General Comment: Ausgrid LNSP has concerns with the processes linked to new minimum services functionality, particularly how they will be automated and standardised to facilitate the update of MSATS with standing data. It is unacceptable to Ausgrid to be forced into delivering functionality to facilitate a process where Ausgrid is not directly involved. It is currently unclear how any processes will work to support minimum services functionality updates of MSATS. Reviewing the CATS documentation in isolation to industry procedures (B2B) will lead to inefficient outcomes for the market.</p> <p>(s) Inform the LNSP when a connection point is remotely disconnected or remotely reconnected unless the remote disconnection or remote reconnection has been performed by the LNSP.</p> <p># This shouldn't be a FRMP obligation – should sit with the party doing the work</p> <p>Procedural improvement: Clause 2.2.s places an obligation on the FRMP to notify the LNSP of a remote disconnection or reconnection. Later clause 2.7.c places an obligation on the MC to also notify the LNSP of a remote disconnection. Placing similar or same obligations on different parties is inefficient and would cause confusion. We would suggest that only one party is made responsible for notifying of the intent for a remote disconnection or reconnection and notifying when the remote disconnection or reconnection is completed. We would suggest that the party who requests for the remote disconnection or reconnection notifies all other impacted or interested parties and the party who completes the remote disconnection or reconnection notifies all impacted or interested parties. For the request of a remote disconnection or reconnection the requesting party can be the Current FRMP, New FRMP or Current LNSP. For completing the request the party could be the Current MC, Current MP or Current MDP – a discussion and decision that AEMO has deferred to consultation package 2. The channel and form of communication should be via SMP as it would support the requirement for the notification to be near real time. Using MSATS as the communication channel would be problematic given its nightly batch processing model. We would</p>			<p>Refer to section 4.56</p> <p>Refer to Appendix A – Table 12 – Other Issues Related to Consultation Subject Matter – Item 2</p> <p>Refer to section 4.56</p>
	Origin						
	Endeavour Energy						

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	AGL Active Stream United Energy			<p>suggest that AEMO do not add any obligations on this matter until further workshops are held to resolve the issue.</p> <p>P28 – clause (s) Unacceptable Obligation should be that the FRMP must ensure the LNSP is informed ...when the FRMP initiates the remote... And why is the responsibility only to the LNSP ? Remote services may be initiated by other parties</p> <p>(s) the LNSP will be advised by the relevant CR, but otherwise comfortable with this.</p> <p>Append additional sentence to clause (s): Where there are two or more remotely operated meters at a connection point the FRMP must ensure that all meters have been successfully remotely disconnected or reconnected and updated before informing the LNSP of the change of connection status. Modify clause (s): The FRMP must update MSATS to record the change of the Metering Status.</p>			
27.	AGL	2.2(o), (p), (q) (r)	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	<p>Aren't these the same obligations with just different triggers ? Surely there is one obligation and a bullet list of triggers</p>			Agreed.
28.	United Energy	2.2	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	<p>Old 2.2(a)Why remove the first line – shouldn't this just say "Appoint the MC"</p>			Agreed
29.	ActewAGL	2.2(l)	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	<p>Reword (l) to Remain the Current FRMP and be responsible for all charges up to the actual date of change of financial responsibility to the New FRMP as notified by MSATS.</p>			AEMO does not agree with the proposed wording as it is ambiguous as to the charges that the FRMP is responsible for
30.	AusNet Services	2.2	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	<p>Old (a) AusNet Services questions why this has been removed. CATS is the procedure which enables this obligation to be enacted. AusNet request that this clause remain. This also ensures some consistency that aligns with the obligations of the MC in appointing SP's which has been included into the CATS procedures.</p> <p>(s) AusNet Services believes there needs to be timeframes regarding this clause. If this notification is not going to be via CATS then this needs to be removed from the CATS procedure and ensured it's captured in the procedure that is going to provide these timeframes and notifications. If the notification is going to be via MSATS then timeframes need to be added to this clause. AusNet believes the time frame should be within 10 minutes of performing the action.</p>			<p>Para (a) was deleted because it is a duplicate of the rule.</p> <p>Refer to section 4.56</p>
31.	Red Lumo	2.2	FINANCIALLY RESPONSIBLE MARKET PARTICIPANT	<p>(r) Update or provide the Customer Classification Code established in MSATS within five <i>business days</i> of a Consumer Transfer Change Request being Completed, where the Customer Classification Code has changed.</p>			Agreed.

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APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

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				<p>Should this be updated to End User, Consumer Transfer Change Request is not within the glossary?</p> <p>(g) Ensure that any Pending retail transfers are withdrawn within 210 days of the lodgement of the Change Request. Is this calendar or business days?</p> <p>Suggestion is for the number of days to be decreased from 210 to 180 business days.</p>			<p>Days is defined in the NER</p> <p>AEMO needs to understand why there is a compelling case for this to occur</p>
32.	Ausgrid	2.3(e)	LOCAL NETWORK SERVICE PROVIDER	<p>Ausgrid ask that clause (e) be reworded as the timing of the ADL delivery has been removed. "Provide the average daily load to the Current MDP or the new MDP upon request." The clause previously stated "at the time of NMI creation." For example, Ausgrid does not accept that a current MDP could request the ADL for all sites after 5 years of the MDP managing a group of NMI's.</p> <p>(K) Ausgrid has reviewed the impacts to systems to include a new NMI Status of 'R'. The NMI Status is a key component of system functionality, we estimate that the addition of the NMI Status code of 'R' will at least cost \$500,000 with no benefit to the LNSP as it impacts:-</p> <ul style="list-style-type: none"> • Meter Data Delivery • Substitution and Estimation • Datastream Processes • Standing Data updates • Service Order Functionality • Customer Threshold update (g) • System Reporting • Other internal processes <p>Ausgrid notes that the disconnection method (Remote in this instance) is not represented in MSATS for any other disconnection types (Pole Top / Main Switch / Fuse etc). Ausgrid believe alternate update methods to reflect the remote disconnection are available and should be considered against a cost benefit analysis. Alternate update methods directly reflect the action taken by participants involved in the minimum services transaction.</p> <p>Alternate Solution:</p> <p>Under the new procedures Market Participants must use Standing Data stored at the Meter Level to determine if a meter is capable of minimum services functionality e.g. Meter Installation Type of COMMS4D. Ausgrid therefore propose that a remote disconnection could be represented in MSATS at the Meter Level using a new Meter Status of 'D' – Disconnected Remotely. Benefits of the alternate solution include:-</p> <ul style="list-style-type: none"> • All Market Participants are advised of the remote transaction via existing Change Requests (CR30xx) • Market Participants can choose if they update backend systems with functionality to show remote disconnections / reconnections. • MSATS updates are reflective of participants that are part of the minimum services transaction e.g. MPB or MC would 			<p>Agreed.</p> <p>Refer to section 4.56</p>

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APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

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				<p>need to update the Meter record in MSATS, LNSP is not involved.</p> <ul style="list-style-type: none"> Costs to Market Participants not involved in the minimum services transaction are minimal (MDP, LNSP). The alternate solution gives the ability to show instances where only a single meter is remotely disconnected. <p>Ausgrid estimate the cost to implement the alternate solution to be \$30,000 a saving of at least \$400,000.</p>			
33.	Pacific Hydro	2.3	LOCAL NETWORK SERVICE PROVIDER	<p>Adopt the Role of Metering Coordinator (RP) who appoints the, MP MPB, MPC and MDP as required by the National Electricity Rules NER and any derogation to the National Electricity Rules.</p>			Agreed.
34.	Endeavour Energy	2.3	LOCAL NETWORK SERVICE PROVIDER	<p>Procedural improvement: Clause 2.3.k and 2.3.m places an obligation on the LNSP to update the NMI Status to 'R' and 'A' when notified of a remote disconnection or reconnection respectively. This is inefficient because it places an obligation on a party who did not perform the actual service but must have systems and processes in place to manage the status another party's asset and it does not provide the granularity of information because it is at the NMI level when the service can be performed at a meter register level. Another complexity is when a meter is remotely disconnected and subsequently the site was manually de-energised and later manually re-energised the LNSP will need to keep a history so that the NMI Status goes from 'A' to 'R' to 'D' and then back to 'R' instead of 'A'. We would suggest that the obligation should be with the party who performed service work to update the Meter Register Status to indicate if it is remotely disconnected or reconnected. Other impacted clauses are 2.3.g</p> <p>Procedural improvement: Clause 2.3.e should be deleted because the Current MDP has access to the metering data and the New MDP can obtain the existing ADL from MSATS from the FRMP via NMI Discovery Search 2. Placing an obligation on the LNSP to provide information that is readily available is inefficient.</p>			<p>Refer to section 4.56</p> <p>This is an existing requirement, and the clause will be reverted back to say that LNSP needs to provide the ADL at the time of NMI creation.</p>
35.	Metropolis	2.3	LOCAL NETWORK SERVICE PROVIDER	<p>DNSP is responsible to mark sites as (A)ctive, (R)emotely deenergised or (D)eenergised. This does not allow for remote de-en followed by fuse pull.</p> <p>There will be delays in updating remote status changes, due to the DNSP being a middle-man.</p> <p>2.3(o): No timing requirement for updating network tariff code. This is required after every meter exchange, and the timing is important for Retailer invoice set up and verification of NTCs.</p>			<p>Refer to section 4.56</p> <p>Refer to section 4.89</p>
36.	AGL	2.3	LOCAL NETWORK SERVICE PROVIDER	<p>P28 This sections is inconsistent and does not operate smoothly in the new environment. Suggest a review of process be considered and obligations re-written.</p>			AEMO requires more information with regards to why the participant think the section is inconsistent and does not operate in the new environment, and will contact the participants after publishing the draft determination to clarify.
37.	AGL			<p>PP28/29 – clause (b)(r)(s) These obligations to consider and act should be brought together – with a list of triggers</p>			It is not possible to bring clauses together as clause (b) is an obligation of the new LNSP however

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							clauses (r) and (s) are obligations of the current LNSP
38.	AGL			P28 cl(c) para starting The current LNSP... is incorrect. This obligation is incorrect. The LNSP must not adopt the role. Current LNSP after allocating a NMI cannot be MC.			Agreed, clause will be deleted.
39.	AGL			Pp28/29 – clause (j) (l) Why does this clause apply only to accumulation meters ? Why is it assumed that LNSPs do not have remote disconnection services available ? Why is the time frame 5 days - particularly if the service is remote ? Obligation should be on actioning party to update connection status with de-energisation type – physical or remote			AEMO clarifies that clause (j) applies to both accumulation and interval meters. Remote disconnection obligation is now moved to the Metering Provider refer to issue #6.2
40.	AGL			Pp28/29 – clause (k) (m) Why is the LNSP responsible for updating the NMI status after a service is performed by another party ? This should be the responsibility of the party undertaking the service.			Refer to section 4.56
41.	AGL			P29 – cl(n) updating NMI to X should be 5 days after work completed – not when aware			AEMO needs to understand why there is a compelling case for this to occur
42.	AGL			P29 – clause (n) The event can also be in the past and therefore cannot be a Proposed date Delete word proposed			The Proposed Change Date is a field name in all change requests that can be populated for prospective and retrospective change requests
43.	Active Stream	2.3	LOCAL NETWORK SERVICE PROVIDER	Replace all instances of 'Metering Coordinator' with 'MC' to retain consistency across documents (c) LNSP cannot be MC, separate roles. Transitional arrangements do not belong in this document (d) Inconsistent use of clause and section in reference to the NER. Active Stream believe this reference should be a clause. This is repetitive throughout document. Must be consistent (n) The term "aware" implies the LNSP was not the one to perform the abolishment. Even if it was an ASP, they are a sub-contractor of the LNSP. The LNSP should be aware of an abolishment before it occurs. The clause needs to be firmer. Also, can be done retro, therefore not just proposed.			AEMO agrees that MC should be used. Agreed, clause will be deleted AEMO agrees that consistent references to NER clause will be used. AEMO needs to understand why there is a compelling case for this to occur
44.	United Energy	2.3	LOCAL NETWORK SERVICE PROVIDER	Points (k) & (m): These proposed procedures require the LNSP to update NMI status even when the LNSP did not cause the change. It should be the responsibility of FRMP or MC to update MSATS if the FRMP / MC has made the change.			Refer to section 4.56

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				The statement “Adopt the Role of Metering Coordinator (RP) who appoints the, MP and MDP as required by the National Electricity Rules NER” does not apply after the meter churns away from the Initial MC. The statement needs to distinguish between the Initial MC and the Ongoing MC			Clause (c) will be deleted as it is a transitional arrangement as per the NER.
45.	ActewAGL	2.3	LOCAL NETWORK SERVICE PROVIDER	<p>No rules indicate mandatory requirement for a LNSP to create a NMI with a FRMP, or any participants, only here in these procedures, therefore to improve NMI discovery and competition, remove this criteria (second sentence in (a)) and make it that FRMP, MC, MPB, MDP, MPC not mandatory. See further notes in 10.1</p> <p>Reconnected is a defined term in the Rules, why is it not italicised?</p> <p>(p) duplicated wording from Rules 7.13.2, so remove</p>			<p>Refer to section 4.67</p> <p>Agreed.</p> <p>AEMO does not agree the clause is exact duplicate of the rule as it includes MSATS specific functionality (i.e. NMI Discovery)</p>
46.	AusNet Services	2.3	LOCAL NETWORK SERVICE PROVIDER	<p>(d) AusNet Services believes the reference in this clause is incorrect and should be 17.13.2.</p> <p>AusNet Services believe there should be two levels of ‘re-en/de-en’ and it should be at NMI level which the LNSP is responsible for and the second should be at a meter status level which the service provider should be responsible for. This more correctly places the obligation on the actioning party and hence eliminates potential delays and handling errors.</p> <p>Both of these statuses could sit at the NMI Standing Data level. A new field on that table should be created called Supply Contactor Status this field would be controlled by the service provider. This allows the LNSP to just be responsible for the physical status of the NMI. This removes the obligation on the LNSP to update a field to a status that they have no involvement in and can’t be 100% assured that the meter is actually remotely disconnected or reconnected.</p> <p>This would then mean that (k) and (m) would become a MP obligation to update the Supply Contactor Status to R or A. Note that this does not eliminate the need for the DNSP to receive a notification to ensure that the DNSP system is correct at all times and not just driven by the delayed notification from MSATS.</p>			<p>Agreed, clause reference will be modified to 7.13.2</p> <p>Refer to section 4.56</p>
47.	Red Lumo	2.3	LOCAL NETWORK SERVICE PROVIDER	<p>(j) Update NMI Status Code to “D” within five business days of the <i>connection point</i> being de-energised by the LNSP. The Proposed Change Date shall be the day after the de-energisation for an Interval Metered <i>connection point</i> or the day of the de-energisation for a Accumulation Metered <i>connection point</i>.</p> <p>(k) Update NMI Status Code to “R” within one business day of receiving advice of the <i>connection point</i> being remotely <i>disconnected</i>. The proposed change date shall be the day after the remote <i>disconnection</i>.</p>			AEMO will be updating those clauses as the remote disconnection will be added to the meter level as per participant feedback in the second draft of the procedure

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				<p>(l) Update the NMI Status Code to 'A' (Active) within five business days of the <i>connection point</i> being re-energised by the LNSP. The Proposed Change Date shall be the day the <i>connection point</i> is re-energised.</p> <p>(m) Update NMI Status Code to 'A' (Active) within one business day of receiving notification of the <i>connection point</i> being remotely reconnected. The Proposed Change Date shall be the day the <i>connection point</i> is remotely reconnected.</p> <p>Please provide the reason for the different timeframes for each of the above.</p> <p>(j)... for a Accumulation Metered <i>connection point</i>.</p> <p>This should be 'an' not 'a' and applied throughout the procedure.</p>			
48.	Origin	2.4	LOCAL RETAILER	<p>The Current LR must:</p> <p>(a) on request Provide access to historical metering data (up to 12 months or otherwise defined by the relevant Jurisdiction) to the newly Current FRMP for initial (1st to 2nd) transfer of the <i>NMI</i>. (After the transfer has been effected in CATS or as allowed by Jurisdictional requirements.)</p>			The requested change is not necessary because, in practice, the LR will only need to provide access upon request.
49.	AGL	2.4	LOCAL RETAILER	<p>P29 Is this obligation still relevant ?</p>			Agreed, The clause will be deleted as it was enforced by the jurisdiction for market start up and it is no longer relevant
50.	Ausgrid	2.5	METERING DATA PROVIDER	<p>Clause (h): Use the defined term, not "estimate". Clause (k): Add "4A". Clause (q): Add "4A".</p>			Agreed
51.	Origin	2.5	METERING DATA PROVIDER	<p>m) Obtain the ADL from the New LNSP or Current LNSP and enter the value into MSATS if the ADL has not been entered into MSATS within 5 business days</p>			AEMO needs to understand why there is a compelling case for this to occur
52.	Pacific Hydro	2.5	METERING DATA PROVIDER	<p>(a) Use reasonable endeavours to provide metering data to the New FRMP within two <i>business days</i> of a request for this information from the New FRMP. Timeframe Rules Jurisdictional rules define the period for which <i>metering data</i> can be requested.</p> <p>The Timeframe rules do not define the period for which the meter data can be requested.</p>			Agreed. AEMO will delete the second sentence in para (a)
53.	Endeavour Energy	2.5	METERING DATA PROVIDER	<p>Procedural improvement: Defined terms in the glossary should be used to avoid confusion. We would suggest rewording clause 2.5.h to 'Use reasonable endeavours to obtain an Actual Meter Reading where requested but when unable to do so provide a Substitution in accordance with jurisdictional requirements.'</p> <p>Procedural improvement: Meter type 4A and 5 should be added to clause 2.5.k</p> <p>Procedural improvement: Meter type 4A and 5 should be added to clause 2.5.q</p>			Agreed. Agreed Agreed
54.	AGL	2.5	METERING DATA PROVIDER	<p>P30 These obligations need review and consideration.</p>			The submission is too vague.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
55.	AGL			P30 – cl(c) Contradicts the Metrology Procedure Part B, s3.3			It is unclear which part of section 3.3 in Metrology Part B contradicts with this clause, there are no similar obligations in Metrology Part B, however SLP MDP has been updated to include this obligation
56.	AGL			P30 – clause (c) (d) These clauses should be brought together with dot point triggers for basic / interval requirements			These two paragraphs deal with different subject matter. It is hard to see how they could be brought together without creating more confusion.
57.	AGL			P30 – cl(i) Remove document ref number and words '(as amended from...time)' – not relevant			Agreed.
58.	AGL			P30 – clause (k), (q) Is a type 4A always a sub-set of a type 4 So if type 1-4 is listed, does that include type 4A ? Should be any remotely read meter			Type 4A has been added to the listed meters.
59.	Active Stream	2.5	METERING DATA PROVIDER	(c) contradicts section 3.3 of Met Proc part B that states that no need to Inactivate d/s Active Streams position is that Datastream should be made 'inactive' where the site has been physically de-energised and 'active' for remotely de-energised sites (i)Remove (as amended from time to time). Make document number reference a footnote or remove (k)+(q) instead of 1-4, believe this should now read "remotely read"			It is unclear which part of section 3.3 in Metrology Part B contradicts with this clause, there are no similar obligations in Metrology Part B, however SLP MDP has been updated to include this obligation . AEMO agrees with participant comment that the MDM data stream should be made inactive when the site is physically de-energised, and remote disconnection does not cause the MDM data stream to be de-activated as this will be at the Meter Level Para (i) Agreed. Type 4A has been added to the listed meters.
60.	ActewAGL	2.5	METERING DATA PROVIDER	(k) why is MPB changed to MP, but not throughout the document. Make it consistent with the rules throughout.			Agreed
61.	Red Lumo	2.5(p)	METERING DATA PROVIDER	(p) For <i>metering installations</i> that are manually read (<i>NMIs</i> with a Metering Installation Type Code of BASIC, MRIM, or MRAM), update the Next Scheduled Read Date in MSATS within two <i>business days</i> of a <i>meter</i> being read. MRAM is not included in the glossary, recommend inclusion.			Metering Installation Type Codes have been deleted from the Glossary
62.	Ausgrid	2.6	METERING PROVIDER – CATEGORY B	Clause (a): Add "4A". Clause (f): Delete "Status Code".			Agreed Register Identifier Status Code is a correct standard term that is used across the document
63.	Endeavour Energy	2.6	METERING PROVIDER – CATEGORY B	Procedural improvement: Meter type 4A and 5 should be added to clause 2.6.a			Agreed
64.	AGL	2.6	METERING PROVIDER – CATEGORY B	P31 – cl (a) Change Type 1-4 to remotely read metering installations			Type 4A has been added to the listed meters.
65.	AGL			P31 – clause (c) Information should also be provided to the FRMP			Refer to section 4.56

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
66.	AGL			P31 – clause (d) Provide information to the FRMP			AEMO believed that this can be handled by agreements between participants
67.	ActewAGL	2.6	METERING PROVIDER – CATEGORY B	Its MPB here			Agreed
68.	Ausgrid	2.7	METERING COORDINATOR	Ausgrid propose an update to the existing clause (c) Inform the LNSP and FRMP when a meter(s) is disconnected or reconnected remotely within 1 business day.			Refer to section 4.56
69.	Origin	2.7	METERING COORDINATOR	(c) Inform the LNSP when a connection point is remotely disconnected. # This obligation is also showing as an obligation on the FRMP in section 2.2 and should be an MP obligation			Refer to section 4.56
70.	Pacific Hydro	2.7	METERING COORDINATOR	(b) Appoint an MP (updating the roles of MPB and MPC accordingly) for the provision, installation and maintenance of the metering installation, and ensure that the metering installation is provided, installed and maintained in accordance with the NER and the procedures authorised under the NER. Inform the LNSP when a connection point is remotely disconnected. To remove the confusion generated from the field id remaining as RP but holding the MC details, particularly with new entrants in the market taking up the role of MC and ENM, it is suggested the field id be changes to MC. It is understood this would require a co-ordinated approach by AEMO and participants.			Agreed Whilst the competition in metering rule change removes the role of 'responsible person' and creates the new role of MC, AEMO cannot amend the role ID of 'RP' in MSATS without incurring significant cost, as system changes will be required and costs will be incurred as a result. Consequently, it proposes to use the term 'MC' in a procedural context and 'RP' when referring to the Role ID.
71.	Energy Australia	2.7	METERING COORDINATOR	(c) It's not clear if the MC or the MDP is responsible to perform de-energisations or re-energisations and to update MSATS. (d) Will AEMO generate a report in MSATS to notify the MC about the errors/omissions?			AEMO has proposed that the decision as to who should be accredited to perform remote disconnections or remote reconnections will be considered with industry in the development of the registration and accreditation procedures - due for publication by 1 March 2017. The service level procedures will have provisions limited to Type 4A installations. The LNSP will remain to be the only role id who will update the NMI status code in MSATS. AEMO needs to understand why there is a compelling case for this to occur
72.	Endeavour Energy	2.7	METERING COORDINATOR	Procedural improvement: For clause 2.7.c please see the comments on clause 2.3.k above. Procedural improvement: There should be a new obligation on the MC to ensure that the standing data used by the MP and MDP are correct and consistent. For example the Meter Serial ID populated in MSATS by the MP must be the same Meter			Refer to section 4.56 AEMO needs to understand why there is a compelling case for this to occur

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				Serial ID populated in the NEM12. We would suggest a new clause 2.7.1 as 'Ensure that the values for data fields defined in the NMI Standing Data Schedule is correct and used consistently when updating MSATS and in all communication including MDFF, MDM, B2B and notification of metering work.'			
73.	AGL	2.7	METERING COORDINATOR	P31 Should both FRMP and LNSP be advised of MP/MDPs appointed			Refer to section 4.56
74.	AGL			P31 – clause (c) Why the MC informing – MC should ensure the parties are informed Why only remotely disconnected If an MP de-ens a site for meter replacement and must leave it off for safety reasons it will be a manual de-en and should be advised to the LNSP to take over responsibility, as well as to the FRMP Obligation should only apply to MC when they initiate			Refer to section 4.56
75.	AGL			P32 – cl(h) Use full name of document – SLP-MDP			Service Level Procedure (MDP) is the defined term and this will be used in this section.
76.	Active Stream	2.7	METERING COORDINATOR	(c) Places the same obligation as 2.2(s) for FRMP. The obligation can only be on one party. Since MDP/MP can instigate a remote de-en themselves, and they are contracted to the MC, would it not make more sense for the MC to hold the obligation? (h) use documents full names			Refer to section 4.56
77.	United Energy	2.7	METERING COORDINATOR	Append additional sentence to clause (C): Where there are two or more remotely operated meters at a connection point the MC must ensure that all meters have been successfully remotely disconnected or reconnected before informing the LNSP of the change of connection status It would appear that the LNSP will be advised from multiple parties. The MC should also update the FRMP when a connection point is remotely disconnected. Timeframes need to specify in relation to notification. Shouldn't the MC be responsible for updating MSATS?			Refer to section 4.56
78.	ActewAGL	2.7	METERING COORDINATOR	Now its MP			Agreed
79.	AusNet Services	2.7	METERING COORDINATOR	AusNet Services believes this is a contractual agreement between the FRMP and should not be an obligation on the MC. (c) AusNet Services believes there needs to be timeframes regarding this clause. If this notification is not going to be via CATS then this needs to be removed from the CATS procedure and ensured it's captured in the procedure that is going to provide these timeframes and notifications. If the notification is going to be via MSATS then timeframes need to be added to this clause. AusNet Services believes the time frame should be within 10 minutes of performing the action.			It is unclear to AEMO which clause the participant is referring to Refer to section 4.56
80.	Red Lumo	2.7	METERING COORDINATOR	An MC must: (c) Inform the LNSP when a <i>connection point</i> is remotely disconnected.			Refer to section 4.56

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				Timeframe has not been assigned, recommend within two business days. SLP – The acronym is not included within the glossary.			
81.	Origin	2.8	RETAILER OF LAST RESORT	As the <i>ROLR</i> for a <i>ROLR</i> Event is determined and appointed by a Regulator, the <i>ROLR</i> Role in MSATS is for indicative purposes only. # Is this effectively saying then there should be no validations regarding having the <i>ROLR</i> role correct in MSATS – this seems to be correct where there is a failed retailer event but not where it is applicable to an obligation to supply the site with an offer			AEMO requires more information with regards to what the participant is requesting, and will contact the participants after publishing the draft determination to clarify
82.	Energy Australia	2.8	RETAILER OF LAST RESORT	Insert after indicative purposes only “or reflects the appointed default RoLR”.			The paragraph will be amended to refer to section 37, instead, until clarification of the RoLR of choice process.
83.	Red Lumo	2.9	SECOND NETWORK SERVICE PROVIDER		Consider inclusion of this role within the Embedded Network Parent NMI Participant Relationships with the Embedded Network Manager participant ID listed as the NSP2 role		Refer to section 4.3
84.	Ausgrid	2.10	AEMO	Ausgrid requests that AEMO use ‘logic’ within the NMI ranges / sets provided in (h). For example, embedded networks in the Ausgrid area currently have a NMI of 4104xxxxxx. The first four characters of the NMI should be reflective of the Jurisdiction and Network to which the parent is connected.			AEMO needs to understand why there is a compelling case for this to occur and will refer the matter to the technical workstream for further consideration
85.	Pacific Hydro	2.10	AEMO	(h) (k) Cancel/withdraw any incomplete dormant retail transfers, which remain incomplete after 7 months from the date of after initiation.			Agreed
86.	Endeavour Energy	2.10	AEMO		Procedural improvement: Only one party should be allowed to update the Embedded Network Code on the Parent NMI. We would suggest that this be the LNSP, therefore clause 2.10.e should be reworded to ‘Populate MSATS with the Embedded Network Code that had been provided to AEMO by the LNSP within two business days of receipt.’		Agreed
87.	Endeavour Energy	2.10	AEMO	AEMO’s Power Of Choice Information Paper, issued on 8 April 2016, stated that ‘Some retailers indicated that they use NMIs to identify the area or region to which the NMI belongs. As such, there is a strong preference for maintaining some form of consistency between NMIs allocated in a particular area to both the LNSP and the ENM’ (page 21). We note that each Child NMI must have an Embedded Network Code where the first two characters of the Embedded Network Code correspond to the LNSP of the Parent NMI. We believe that the NMI range allocated to the LNSP and the Embedded Network Code allocated to a Child NMI provides sufficient information to satisfy the above requirement from the Retailers.			AEMO needs to understand why there is a compelling case for this to occur

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
88.	AGL			P32 – note Is the period 220 business days (ie a year) or 7 months (ie 220 calendar days)			Business day and day are both defined in the National Electricity Rules. Day is defined as the 24 hour period beginning and ending at midnight Eastern Standard Time (EST) and is therefore calendar days.
89.	Active Stream	2.10	AEMO	(k) delete “dormant”, delete “after” 7 months Note: remove “dormant” Reinstate “calendar” days by itself means business days.			Agreed. The sentence could read better Days by itself does not mean business days. See earlier comments on ‘day’ vs ‘business day’.
90.	Red Lumo	2.10(k)	AEMO	(k) Cancel/withdraw any incomplete dormant retail transfers after 7 months after initiation. Suggested change: (k) Cancel/withdraw any incomplete dormant retail transfers 7 months after initiation. Consider updating 7 months to reflect business days rather than calendar days as the majority of references throughout the procedures are to business days.	(h) Provide, on request from the New ENM, a set/range of <i>NMIs</i> and <i>NMI Checksums</i> to that New ENM for allocation by that ENM to <i>child connection points</i> . (i) Provide, on request from a Current ENM, one or more <i>NMIs</i> and <i>NMI Checksums</i> to that Current ENM for allocation by that ENM to the newly formed <i>child connection points</i> . Recommend inclusion of timeframes for the above.		AEMO does not agree with the proposed change as this is an existing requirement and is programmed into MSATS. AEMO needs to understand why there is a compelling case for this to occur
91.	Ausgrid	2.11	EMBEDDED NETWORK MANAGER	General: The entire clause is poorly constructed. Clause (e) – The 2nd one: Duplicate of clause (a) – The 4 th one.			It is unclear to AEMO which clause and sections of clauses the participants is requesting the changes for
92.	Lendlease	2.11	EMBEDDED NETWORK MANAGER		Section m suggests that the ENM can store Network Tariff Codes for each NMI in its area (what is essential to be able to effectively shadow price the LNSP should a customer wish to leave the EN). However sections 11.4, 23.5, and 26.4 do not appear to capture this. It is also not clear if it is possible to set the tariff code to one replicating the LNSP (so as to be able to shadow price as permitted within the rules).		Refer to section 4.89

POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
93.	Pacific Hydro	2.11	EMBEDDED NETWORK MANAGER	a) Initiate a Create NMI Change Request. This must be done within two <i>business days</i> of the mandatory data required by the Change Request becoming available. This mandatory information includes that consent from a <i>retailer</i> to be nominated as the FRMP in MSATS has been obtained by the ENM prior to initiating the Change Request.			Agreed.
94.	Endeavour Energy	2.11	EMBEDDED NETWORK MANAGER		<p>Procedural improvement: There should be an obligation for an ENM to update the NMI status from 'N' to 'A' when a child NMI is again being settled in the NEM.</p> <p>Procedural improvement: Only one party should be allowed to update the Embedded Network Code on the Parent NMI. We would suggest that this be the LNSP, therefore clause 2.11.e should be deleted</p> <p>Procedural improvement: Defined terms in the glossary should be used to avoid confusion. We would suggest that clause 2.11.e be reworded to 'Allocate the Embedded Network Code of the Parent NMI to the Child NMI'</p>		<p>Refer to section 4.3</p> <p>Agreed.</p> <p>Clause 2.11(e) will be reworded to clarify that ENM can update the Parent Name on parent NMI when the Child NMI is a parent NMI, example is when there is an embedded network within another embedded network</p>
95.	AGL	2.11	EMBEDDED NETWORK MANAGER	References (a)... (f) are repeated in cl 2.11			AEMO needs more details as to what the participant is requesting
96.	AGL				P33 – clause (d) Obligations are not sequential – wont be able to initiate a NMI create without first obtaining a NMI from AEMO – suggest the order of obligations be reviewed		Agreed.
97.	AGL				P34 – clause (g), (h),(i),(k) See previous comments Why is ENM responsible for status updates if they do not undertake the work How will they know if they are not transactional The status options available to them are inadequate		Refer to section 4.56
98.	ActewAGL	2.11	EMBEDDED NETWORK MANAGER	Clause (a) will prohibit ENM from registering all child NMI's in their network thus barrier to competition if they have to wait for a retailer. Remove second sentence. See comments in 2.3			Refer to section 4.67

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				Delete (n) as duplicated from rules			AEMO does not agree the clause is exact duplicate of the rule as it includes MSATS specific functionality (i.e. NMI Discovery)
99.	Red Lumo	2.11	EMBEDDED NETWORK MANAGER		<p>Suggested inclusion: Ensure all child NMIs attached to an embedded network have the same DLF and that this DLF is the Parent's DLF.</p> <p>Similarly: Ensure all child NMIs attached to an embedded network have the same TNI and that this TNI is the Parent's TNI.</p> <p>Clarification is required as to who sets the TNI on a child NMI. TNI is not mentioned within this clause; it is mentioned in 11.4 ENM obligations</p> <p>Clarification is required as to which participant maintains the MDM Datastream suffix for an off-market child NMI in N status.</p>		<p>Agreed</p> <p>ENM will set and maintain the TNI code on child NMIs</p> <p>The MDP will update the MDM datastream suffix</p>
100.	Origin	3.1	OVERVIEW	g) A Change Request will be Completed on the date nominated as the Actual Change Date, if this is a future date, or on the earliest date after the Objection Logging Period has been reached, or if the Actual Change Date is a Retrospective Day and all Objections have been removed.			The wording for this clause will be modified.
101.	Pacific Hydro	3.1	OVERVIEW	<p>(g) A Change Request will be Completed on the date nominated as the 'Actual Change Date', if this is a future date, or on the earliest date after the Objection Logging Period has been reached, or if the Actual Change Date is a Retrospective Day all Objections have been removed, if the Actual Change Date is a Retrospective Date.</p> <p>This clause is confusing. Suggest the following: A prospective Change Request will be completed on the nominated 'Actual Change Date' or on the earliest date after the 'Objection Logging Period' has been reached. A retrospective Change request will be completed once all objections have been removed. If there are no objections, on the earliest date after the 'Objection Logging Period' has been reached.</p>			AEMO agrees that amended wording is required but disagree to the proposed wording
102.	Energy Australia	3.1	OVERVIEW	3.1(f) If the status each NMI master record is "current" and the changes to "new". When does the status "new" change to "current" as it is not clear.			AEMO clarifies that 'new' means nominated on the Change Request, and that current means the current role in the MSATS master tables, Once a Change Request is Completed the new changes to current
103.	Active Stream	3.1	OVERVIEW	(a) Reference should be to 3.3			Agreed.
104.	Red Lumo	3.1(k)	OVERVIEW	The next most significant transaction is the NMI Discovery Search. This transaction will be used by a Participant when undertaking a search of the CATS Standing Data, as specified in chapter 41 .			Agreed.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				Should this be section?			
105.	Active Stream	3.2	PRINCIPLES	(a) Notification should be singular			Agreed.
106.	Origin	3.3	TRANSACTION TYPES	MSA A request by CATS Participant for provision of the necessary <i>NMI Standing Data</i>			AEMO does not agree with the proposed change as the RDAT transaction type is initiated by the CATS system.
107.	Active Stream	3.3	TRANSACTION TYPES	(a) transaction should be singular			AEMO does not agree with the proposed change as there is more than one transaction in table 3-A
108.	Ausgrid	3.4	CHANGE REQUESTS	Table 3B: Delete CR Codes as per later comments.			The CRs will be deleted
109.	Active Stream	3.4	CHANGE REQUESTS	(b) include should be includes (e) ID's, not IDs. Repeat issue throughout all documents			Agreed on para (b), however, 'IDs' is grammatically correct unless it is being used in the possessive.
110.	AGL	3.5	CHANGE REQUEST STATUS LIFE CYCLE	P40 – Initiation should be in the model			Agreed.
111.	AGL			P40 – cl(e) Change 'The Change Request will be approved only after ..' to proceed to pending			"Approved" does not refer to a Change Request Status, rather it means that there needs to be some sort of validation for the CR to proceed to the next stage.
112.	Active Stream	3.5	CHANGE REQUEST STATUS LIFE CYCLE	Initiation should be included in model (e) change last sentence to "Change request will proceed to Requested only after...", there is no approval, may be validation			Agreed "Approved" does not refer to a Change Request Status, rather it means that there needs to be some sort of validation for the CR to proceed to the next stage.
113.	AGL	3.6	TRANSACTION VALIDATION	P42 (b)(1(i) Change 'The person submitting' to 'The participant ..'			AEMO disagrees. The change would not read well.
114.	Pacific Hydro	3.6	TRANSACTION VALIDATION	The initiator of the transaction Change Request has withdrawn the transaction. When a transaction is Cancelled, notifications are sent to the relevant parties Participants in accordance with the Change Request Status Notification Rules. Need to be consistent; if we have struck out 'transaction' and replaced it with 'Change Request', this needs to flow through the document.			Agreed.
115.	Active Stream	3.6	TRANSACTION VALIDATION	(b)1(i) replace "person" with "participant"			See earlier comment.
116.	Ausgrid	3.7	VALID PROPOSED CHANGE DATE FOR PROSPECTIVE AND RETROSPECTIVE CHANGE REQUESTS	Table 3C: Delete CR Codes as per later comments. Table 3D: Delete CR Codes as per later comments.			Agreed
117.	Pacific Hydro	3.7	VALID PROPOSED CHANGE DATE	(b) For a Retrospective Change, the Proposed Change Date must either be today's the date of on which the Change Request			AEMO disagrees. The change would not read well.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
123.	United Energy	4.2	CHANGE REASON CODE	6700 series should say Current or New (if there is a meter churn we won't be the MP).			AEMO requires more information with regards to what the participant is requesting, and will contact the participants after publishing the draft determination to clarify
124.	ActewAGL	4.2	CHANGE REASON CODE	Table 4-A header, what is missing after who? Should be one of: Initiating Participant; or Initiator; or Participant who initiates; or Change Request owner CR5071 change word Retrospectively to Retrospective			AEMO agrees that the word "who" should be deleted Agreed
125.	Red Lumo	4.2	CHANGE REASON CODE		Recommendation for the inclusion of a Change Reason Code for the update of the ENM for child NMIs within an Embedded Network.		AEMO needs more information as to what the participant is asking. and will contact the participants after publishing the draft determination to clarify. Currently the ENM is updated through the change retailer change requests and can also be update through the Change LNSP as the ENM is stored in the LNSP role id for child NMIs
126.	ERM Power	4.3	ROLE CODES	For large market customers, please confirm that CR's initiated by the FRMP to change retailers are independent of CR's raised by a Metering Coordinator to change metering roles. I.e. the latter will have no bearing upon a successful transfer completion.		Refer to comment for Metering Competition.	Transfer CR 1000 series are not related or dependent on change role CR 6000 series from a system's perspective
127.	Endeavour Energy	4.3	ROLE CODES		Procedural improvement: For clarity Table 4B should have the ENM listed separately, like the NSP2, so it is clear who has rights and obligations with regards to each clause in this document.		As the ENM will not have a separate role id in MSATS similar to the NSP2, it is clearer to leave it in the LNSP row as the ENM will be accessing MSATS through the LNSP role id
128.	ActewAGL	4.3	ROLE CODES	Table 4-B needs an explanation or footnote to make it clear that RP is listed in the aseXML for transactional purposes only and refers to metering coordinator			It is clear in Table 4-B that RP is just a Role Code, through the document references are made to MC when referring to the Participant Role, and to RP when referring to the MSATS Role Code or id.
129.	Red Lumo	4.3	ROLE CODES		Recommendation for the inclusion of Parent NMIs for the NSP2 role		Refer to section 4.3
130.	Active Stream	4.6	TIMEFRAME RULES	(b)1 – change "for" to "to" (b)4 – remove capitalisation of 'Initiated'			The change to para (b)1 is agreed, but the change to (b)4 is not. It should be capitalised.
131.	Ausgrid	4.7	OBJECTION CODES	Ausgrid does not support the removal of the BADMETER Objection Code. Ausgrid use the Objection Code of BADMETER in the scenario below: <ul style="list-style-type: none"> • CR1000 or CR1080 • Read Type Code is NS, RR, SP, PR, ER • Our Systems are the MDP • COMMS Meters exist Our systems have over 250 objections using this code since the start of the year. We expect this number to grow as the number of interval meters increase. The MDP is entitled to object using 'BADMETER' in this instance. If the Objection Code is removed we will be forced to use 'DECLINED'. If the resultant outcome is still an objection isn't it better to use 'BADMETER' to more correctly define the objection?			Refer to section 4.7 8

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				<p>BADMETER is also relevant in the future where CR1000 is raised with a NEW MDP and Read Type Code of NI. A FRMP cannot initiate meter churn, this is not compliant with the Meter Churn rules.</p> <p>BADMETER is also relevant in the future where MRAM metering exists and a participant uses a Read Type Code of EI. The removal of this code is to the detriment of the industry.</p>			
132.	Energex	4.7	OBJECTION CODES	It is not clear to Energex why the “badmeter” objection code has been removed. Further information is required as to the reason for its removal.			Refer to section 4.78
133.	Pacific Hydro	4.7	OBJECTION CODES	<p>BADDATA Used by a participant to indicate the standing data in the change request or the NMI Master Record is incorrect (e.g. meter serial number). If the participant role is incorrect; use NOTRESP.</p> <p>BADPARTY Used by the new MC. One or more of the roles of MDP, MPB or MPC nominated on the Change Retailer request is incorrect. Either it is not the participant required by the MC or the participant does not have the accreditation for the role to which they have been appointed.</p> <p>DATEBAD (4) (a) Used by a MDP. Applies to change of retailer requests for meter types 4A, 5 and 6 to indicate the proposed date in the change request does not align to the date the actual reading is scheduled to be taken. (b) Used by the current FRMP, MDP or MPC for retrospective change of retailer requests where one or both of the proposed change date or actual end date is incorrect.</p> <p>DEBT Used by the current FRMP. Applies to Change Retailer requests. Participants should check the relevant jurisdictional documents for conditions applying to objections for aged debt.</p> <p>DECLINED Used by a participant who does not or cannot perform the role for which they were nominated in the change request.</p> <p>NOACC (2) (1) Used by the MDP where there is no access to obtain metering data from a type 4A, 5 or 6 metering installation to facilitate a change of retailer request.</p> <p>NOTAPRD Used by the LNSP. The MPC and/or MPB is not accredited or authorised to operate within the LNSP area. Can be used more broadly where the participant is not approved to operate in the LNSP area.</p> <p>NOTRESP</p>			Suggested changes will be incorporated into the objection codes descriptions with some modifications..

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				<p>Used by a participant where they are not responsible for a role for which they have been nominated in a change request.</p> <p>RETRO Used by a participant to indicate they do not agree to a retrospective change request.</p> <p>BLOCK Used by AEMO. The objection is raised at the request of a jurisdiction or for operational reasons.</p> <p>CONTRACT (a) Used by the current FRMP and only applies to Large NMIs in QLD. A change of retailer request seeks to transfer an End User who is still under contract to the current FRMP. (b) Used by the MC and only applies to large NMIs in all jurisdictions where they are currently contracted to an End User.</p> <p>NOTRANS Used by the current FRMP and only applies to retrospective change of retailer requests. A check of their records shows no previous change of retailer request exists for the error correction change of retailer.</p> <p>NOTAWARE Used by the current FRMP and only applies to retrospective change of retailer requests. No communication has been received from the new FRMP advising a retrospective change of retailer.</p> <p>CRCODE Used by a participant where the Change Reason Code does not apply to the NMI in the change request.</p> <p>Remove the Note (1) as it is contained in the Description.</p> <p>Note (2) becomes Note (1).</p> <p>It is suggested these codes be placed in alphabetical order in the table.</p>			
134.	Ergon	4.7	OBJECTION CODES	The "badmeter" objection code has been removed. Further information is required as to the reason for its removal, as it is not clear why this has occurred.			Refer to section 4.7 8
135.	United Energy	4.7	OBJECTION CODES	UE believes BADMETER is still a valid objection type.			Refer to section 4.7 8
136.	Pacific Hydro	4.9	NMI CLASSIFICATION CODES	Delete 4.9 (d); the table is already reference in (c).			Agreed.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
137.	ActewAGL	4.9	NMI CLASSIFICATION CODES	(c) remove reference to table 4-E as next sentence already stipulates where they refer and so does this whole section			Agreed
138.	Ausgrid	4.10	END USER CLASSIFICATION	Table 4-G: There is no 'MEDIUM' customer threshold code in NSW. Furthermore, the table should list the available values per jurisdiction similar to Table 4-E.			AEMO does not agree with adding those details into the MSATS procedure, and suggests that Participants refer to the NECF. Table 4-E has MSATS related values which were specified before NECF.
139.	Endeavour Energy	4.10	END USER CLASSIFICATION	Procedural improvement: Table 4-G uses a term called National Energy Retail Regulations, which is not defined in the glossary and removed the text "or in over-riding jurisdictional instruments". For clarity the term National Energy Retail Regulations should be defined in the glossary and include over-riding jurisdictional instruments in the definition if applicable, or define the consumption boundaries similar to Table a-E. We would suggest the latter.			AEMO believe the "National Energy Retail Regulations" does not need to be in the glossary, AEMO is unable to identify any additional jurisdictional requirements, but is happy to consider any specific jurisdictional requirements raised in submissions. AEMO does not agree with adding those details into the MSATS procedure, and suggests that Participants refer to the NECF. Table 4-E has MSATS related values which were specified before NECF.
140.	AGL	4.10	END USER CLASSIFICATION	First sentence is too long for ease of reading			Agreed.
141.	ActewAGL	4.10	END USER CLASSIFICATION	4.10.2 remove "to which the NMI applies". At the end of the first statement as already applied earlier			Agreed
142.	Ausgrid	4.11	STATUS CODES (NMI AND DATASTREAM)	See 2.3 above for Ausgrid's proposal for NMI Status Code of 'R' 4.11.1 As a prospective ENM Ausgrid questions the relevance of the 'N' NMI Status. MSATS has the ability to identify an Off Market Child by comparing the FRMP of the Parent and Child NMI for settlements. Ausgrid does not agree with the requirement to update NMI Status when the FRMP changes on a Child NMI or Parent NMI. Ausgrid feels this change has been implemented to simplify settlements, not for the betterment of the market. Alternatively, this could be updated automatically by MSATS? Clause 4.11.3 (c): Add "MRAM" and "VICAMI".			Refer to section 4.56 Agreed
143.	Origin	4.11	STATUS CODES (NMI AND DATASTREAM)	4.11.1 # Are VIC AMI meters to be updated as R when remotely disconnected? What NMI Status Code will apply when fuse removed after meter has been remotely disconnected? 4.11.3 (c) If the MeterInstallCode is COMMSx, MRIM or UMCP MRAM, VICAMI: 1. DataStreamType must be I or P (P – Sample meters only) 2. ProfileName must be NOPROF 3. Suffix must be Nx (e.g. N1) (d) If the MeterInstallCode is BASIC: 1. DataStreamType must be C 2. In Victoria, Tasmania and ACT, ProfileName must be NSLP			Refer to section 4.56 Agreed

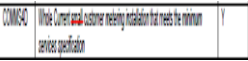
**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				<p>3. In NSW, QLD and SA, ProfileName must be NSLP or the relevant controlled load profile</p> <p>4. Suffix must be numeric (e.g. 11)</p>			
144.	Pacific Hydro	4.11	STATUS CODES (NMI AND DATASTREAM)	<p>4.11.1 For code 'G' use 'Applies when' instead of 'Denotes' to be consistent with the other descriptions.</p> <p>Agree with the new codes 'R' and 'N'</p>			Agreed.
145.	Energy Australia	4.11	STATUS CODES (NMI AND DATASTREAM)	<p>What status are VICAMI meters that are not energised. Currently they are "D" but under this new procedure they would be "R".</p> <p>If a VICAMI meter is a Network device we need to know who performed the de-energisation. For example "Network D & or R.</p>			Refer to section 4.56
146.	Endeavour Energy	4.11	STATUS CODES (NMI AND DATASTREAM)	<p>Procedural improvement: Clause 4.11.1 states that 'The NMI Status Code is used to determine if a NMI can be used for a retail transfer'. However in table 4-H it does not define which NMI Status Code allows a retail transfer. We would suggest adding a new column to indicate which NMI Status Code allows a retail transfer.</p> <p>Procedural improvement: Clause 4.11.3(c) should include MRAM and VICAMI in the lead-in paragraph.</p>			<p>Agreed, but will be drafted differently</p> <p>Agreed</p>
147.	AGL	4.11	STATUS CODES (NMI AND DATASTREAM)	<p>P53 – NMI status Codes</p> <p>List of NMI status codes is inadequate</p> <p>There are 2 parties who can manually or remotely disconnect a site:</p> <ul style="list-style-type: none"> • LNSP/ENO – Remote • LNSP/ENO – Manual • MC/MP – Remote • MC/MP – Manual <p>Safety and Service Order obligations on who can reconnect not clearly shown in these codes as they stand</p> <p>Need status of meters for multiple meter sites</p>			Refer to section 4.56
148.	Active Stream	4.11	STATUS CODES (NMI AND DATASTREAM)	<p>4.11.2, what does 'D, G and X must not be used as DataStream status codes' mean? It is not possible. Consider removing this statement</p> <p>4.11.3 Suggest it would be useful to differentiate between Datastream suffixes and register suffix to avoid confusion.</p>			<p>Agreed</p> <p>AEMO requires more information with regards to what the participant is requesting, and will contact the participants after publishing the draft determination to clarify.</p>
149.	United Energy	4.11	STATUS CODES (NMI AND DATASTREAM)	<p>By recording the Metering Connection Status "R" in the same field as the NMI Status – An issue can occur where the connection was remotely disconnected by an MC (NMI Status goes to "R") followed by a Fuse removal by the LNSP (NMI Status goes to "D"). By having just one field the fact that BOTH the Meters and the fuse are disconnected will be lost. This will result in confusion when attempting to properly re-energise the site again as it will; not be clear that a Remote re-connection must also occur as the Status only shows "D"; It would be better to have a new field "MeteringStatus" that is held at the NMI level and whose state is changed when ALL meters at a site are Remotely Connected or Disconnected</p>			Refer to section 4.56

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
150.	ActewAGL	4.11	STATUS CODES (NMI AND DATASTREAM)	<p>4.11.2 delete last sentence “D, G and X must not be used as Datastream Status Codes.” as it adds no value. Otherwise if this stays then so should the last sentence in 4.11.1</p> <p>4.11.3 (a) reword for clarity to: The Meter Register Status Codes denote the status of the meter within MSATSthe NEM.</p> <p>(d) 4. What do you use if there are more than 9 meters on the NMI?</p>			<p>Agreed</p> <p>Agreed</p> <p>AEMO does not understand the issue.</p>
151.	AusNet Services	4.11	STATUS CODES (NMI AND DATASTREAM)	<p>AusNet Services question why the statement ‘Status code I must not be used as a NMI Status code’ has been removed from this section but not from section 4.11.2. AusNet Services believe this statement should remain to provide clarity to new participants when building their systems as there is not at technical guide for CATS.</p>			<p>As the acceptable statuses have been stated, there is no need to say what is not accepted, and that is the reason for the deletion</p>
152.	Red Lumo	4.11	STATUS CODES (NMI AND DATASTREAM)	<p>4.11.3 Meter Register Status Codes</p> <p>(c) If the MeterInstallCode is COMMSx, MRIM or UMCP MRIM and UMCP are within the glossary, whereas COMMSx isn’t. Recommend that all Meter Installation codes are included not just some.</p>			<p>Metering Installation Types Codes will be deleted from the Glossary</p>
153.	Momentum	4.11	STATUS CODES (NMI AND DATASTREAM)	<p>Is VIC AMI going to be R or D?</p> <p>Overarching statement – which service was done by whom. We need to have statuses on NMI (Connected or not connected) and on a meter level (connected, remotely disconnected, and physically disconnected).</p>			<p>Refer to section 4.56</p>
154.	Ausgrid	4.12	METERING INSTALLATION TYPE CODES	<p>Table 4L COMMS4. Note should simply read “Meter is not capable of minimum services functionality”. The date of installation is irrelevant as many metering companies will have minimum services metering in the field prior to December 2017.</p> <p>(.c) Please clarify the intent of the Manually Read Flag for Interval Meters? What does the Manually Read Flag mean for Non-Interval meters?</p> <p>An additional MSATS field to show if Minimum Service Functionality exists would remove the need for any new Metering Installation Type Codes. Will AEMO provide a cost benefit analysis on the different ways that this change could be implemented?</p> <p>Ausgrid suggest the following mandatory fields to be recorded at the Meter Level:-</p> <ul style="list-style-type: none"> Transformer: Yes / No Minimum Services: Yes / No Remote COMMS: Yes / No <p>Alternatively if AEMO insist on identifying the differences in Metering Installation characteristics using the Meter Installation Code then the ‘MRAM’ code must have an MRAMC and MRAMD to be consistent with COMMS4C and COMMS4D.</p>			<p>Refer to section 4.4</p>
155.	ERM Power	4.12	METERING INSTALLATION TYPE CODES	<ul style="list-style-type: none"> Please confirm the reason for including code MRAM. How does this differ to COMMS4D / COMMS4C? 			<p>MRAM metering installation type code is for type 4A meter which are small customer advanced meters but without any communications, however COMMS4D/COMMS4C metering installation type</p>

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				<ul style="list-style-type: none"> Further granularity is required in MSATS to differentiate different meter types (Single Phase, Dual Element, Three Phase) which may incur different pricing and meter functionality. This request is to ensure fully scalable processes between FRMP & MC. 			<p>codes are small customer advanced meters with communication and which meets the minimum services specifications.</p> <p>Refer to section 4.4</p>
156.	Origin	4.12	METERING INSTALLATION TYPE CODES	<p>COMMS4D Can apply to Large sites so remove the 'small'</p>  <p>VICAMI</p> <ul style="list-style-type: none"> Table needs to confirm if treated as Type 4 or 5 			Refer to section 4.4
157.	Pacific Hydro	4.12	METERING INSTALLATION TYPE CODES	<p>Agree with the inclusion of the new meter Installation Type codes. Vic AMI meters are registered in MSATS as MRIM. Will AEMO update the code in MSATS for each Vic AMI meter? Will Vic AMI apply to all 'advanced' meters in Vic or will those 'advanced' meters still delivering data manually remain as MRIM?</p>			Refer to section 4.4
158.	Energy Australia	4.12	METERING INSTALLATION TYPE CODES	<p>For Type 4A meters we need to be able to identify if the reason for a Type 4A meter. Is it caused by customer or communications failure?</p> <p>Would prefer if the type 4 code could also differentiate between a large and small customer.</p> <p>How will these new codes be implemented ie global change. If so it will require a coordinated approach.</p>			Refer to section 4.4
159.	CitiPower & PowerCor	4.12	METERING INSTALLATION TYPE CODES	<p>AEMO has attempted to provide the Victorian Distributors with the ability to leave Vic AMI Meters as AMI Type 5 (as they are under the Chapter 9C Derogation) and therefore avoid the need for IT system changes and accreditations to achieve type 4 Validation/substitution rules etc.</p> <p>However the creation of the "VICAMI" Metering Installation Code will still require the Victorian Distributors and Retailers to undertake a massive migration of the 2.8 Million existing regulated AMI Meters across to this new Metering Installation Type Code on market start.</p> <p>There will need to be some arrangement and time provided for that work load to be undertaken, over the top of the introduction of the rules and market start on 1 December 2017 and this requirement for the Victorian Meters could possibly be delayed?</p>			Refer to section 4.4
160.	Endeavour Energy	4.12	METERING INSTALLATION TYPE CODES	<p>Procedural improvement: The requirement to distinguish a Current Transformer or Whole Current for type COMMS4 small customer metering installation would also apply to a Type 4A. We would suggest that the Code MRAM be removed and MRAMD and MRAMC be added.</p>			Refer to section 4.4

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
161.	Jemena	4.12	METERING INSTALLATION TYPE CODES	AEMO has provided for a metering installation type code VICAMI. Jemena welcomes the ability of Victorian LNSPs to leave AMI Meters as 'AMI Type 5' (installed under derogation 9.9C) thus avoiding the need for IT system changes and accreditation to achieve Type 4 validation and substitution rules.			Refer to section 4.4
162.	AGL	4.12	METERING INSTALLATION TYPE CODES	Number on meter faceplate should be put into MSATS			AEMO requires more information with regards to what the participant is requesting, and will contact the participants after publishing the draft determination to clarify
163.	Active Stream	4.12	METERING INSTALLATION TYPE CODES	The meter number entered into MSATs must replicate what is on the faceplate of the meter			AEMO requires more information with regards to what the participant is requesting, and will contact the participants after publishing the draft determination to clarify
164.	United Energy	4.12	METERING INSTALLATION TYPE CODES	Table 4: There is no Meter Type definition stated for the "VICAMI" code. It is necessary to clearly define here that VICAMI will be Type 5 (but remotely connected).			Refer to section 4.4
165.	ActewAGL	4.12	METERING INSTALLATION TYPE CODES	4.12 (c) can I borrow one of the "i's for this mistake please			OK ☺
166.	AusNet Services	4.12	METERING INSTALLATION TYPE CODES	A large customer is defined in the in the NER as large customer (a) In a participating jurisdiction where the National Energy Retail Law applies as a law of that participating jurisdiction, has the meaning given in the National Energy Retail Law. (b) Otherwise, has the meaning given in jurisdictional electricity legislation, or a retail customer that is not a small customer. ie a non residential customer less than 40MWh pa. However smart meters (type 4) with MSS capabilities will be installed on sites with greater than 40 MWh pa consumption. In fact where meters are installed at the FRMP choice (rather than due to meter failure) these are more likely to be on larger customers where the benefits to customer and retailer are greater. Hence it is essential that the relevant parties seeking smart meter services (eg distributors, or retailers seeking to make a transfer offer) understand the site meter capability. The Metering Installation Type Codes as proposed does not facilitate this. As proposed the following would apply: COMMS4 Interval Meter with communications – Type 4 (Note: This code is used for large customer with type 4 metering installations and for small customer type 4 metering installation installed before 1 December 2017) COMMS4D Whole Current small customer metering installation that meets the minimum services specifications COMMS4C Current Transformer connected small customer metering installation that meets the minimum services specification MRAM small customer metering installation – Type 4A			Refer to section 4.4

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				<p>VICAMI a relevant metering installation installed in accordance with 9.9A, 9.9B, and as defined in clause 9.9C of the NER clauses.</p> <p>Hence a large customer (>40MWh pa) with a metering installation that meets the Minimum Services Specification will be indistinguishable from a large customer installation which does not meet the MSS.</p> <p>AusNet Services consider that the Type Codes should be: COMMS4 Interval Meter with communications – Type 4 (Note: This code is used for large and small customer type 4 metering installations which do not meet the minimum services specifications. COMMS4D Whole Current large and small customer metering installation that meets the minimum services specifications including large and small customer type 4 metering installation installed before 1 December 2017 COMMS4C Current Transformer connected large and small customer metering installation that meets the minimum services specifications including large and small customer type 4 metering installation installed before 1 December 2017 AusNet Services' proposed Type Code approach achieves the outcome of having the installation capability identified at Type Code level in MSATS. Further the proposed approach removes the need for Type Code changes as customers move above or below the small customer threshold.</p>			
167.	Red Lumo	4.12	METERING INSTALLATION TYPE CODES	Refer comments provided to clause 4.11, include all of the meter installation codes within the glossary.			Metering Installation Types Codes will be deleted from the Glossary.
168.	Momentum	4.12	METERING INSTALLATION TYPE CODES	<p>Identification of various meter type codes, not entirely aligning with the discussions we had in POC forums. E.g. Meter type codes are CT and not CT are only applicable for small customers, and once you go above 40MW there's no transparency.</p> <p>Meter type 4A needs to have some information in MSATS (background data to advise if it is 4A because of customer prevention or comms issue). Not mentioned anywhere in the procedure. Or is this an MC Obligation?</p>			Refer to section 4.4
169.	Ausgrid	4.13	READ TYPE CODE	<p>Table 4M needs to be updated for Read Type Codes NS, RR, SP, ER, CR and PR. "Applies to types 4A, 5 and type 6 <i>metering installations</i>. "</p> <p>NI must be removed from the table, it will not be allowed under the Meter Churn Rules. The FRMP must transfer with the existing metering.</p>			<p>AEMO agrees to this comment, and will be updating the table with 4A metering installation in the second draft of the procedure</p> <p>Refer to section 4.10⁴</p>
170.	ERM Power	4.13	READ TYPE CODE	<ul style="list-style-type: none"> Please provide clarification as to when a transfer would be raised with meter read type code NI. For a small customer transfer where COMMSX / VICAMI exist, please confirm that a prospective move in transfer (1030) can be raised with meter read type code EI, nominating the move in date as the proposed transfer date 			<p>Refer to section 4.10⁴</p> <p>Read Type Code 'NI' will be deleted as it no longer relevant with the rule changes</p> <p>AEMO clarifies that as per Table 4-N read type code 'EI' applies to COMMSx/VICAMI for all CR</p>

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				<p>PTD). And that the transfer will complete for the nominated PTD.</p> <ul style="list-style-type: none"> For a small customer transfer where COMMSX / VICAMI exist, please confirm that a retrospective move in transfer (1040) can be raised with meter read type code EI, nominating the move in date as the proposed transfer date PTD). And that the transfer will complete for the nominated PTD. <p>For a small customer transfer where COMMSX / VICAMI exist, please confirm that an in-situ transfer (1000) can be raised with meter read type code EI, nominating the contract start date as the proposed transfer date PTD). And that the transfer will complete for the nominated PTD.</p>			codes, However the transfer will complete on the actual change date which is the date that the MDP provides and not on the PTD
171.	Pacific Hydro	4.13	READ TYPE CODE	<p>Table 4M Should PR also apply to type 4A metering installations?</p> <ul style="list-style-type: none"> Should NB also apply when a type 4A metering installation is installed 			<p>AEMO agrees with this comment and will add 4A metering installation type to both PR and NM read type codes in the second draft of the procedure</p> <p>Refer to section 4.104</p>
172.	Endeavour Energy	4.13	READ TYPE CODE	<p>Procedural improvement: In table 4-M, Type 4A should be added in the last sentence of the code NS, PR, SP, ER and PR.</p>		<p>Procedural improvement: The code NI in table 4-M is no longer valid because of the Meter Replacement Process Rule. We would suggest that this code be removed.</p> <p>Procedural improvement: Clause 4.13.h is no longer applicable and would not be aligned with clause 11.3.c of Metrology Procedure: Part A. We would suggest deleting clause 4.13.h</p>	<p>Agreed</p> <p>Refer to section 4.104</p> <p>Agreed</p>
173.	AGL	4.13	READ TYPE CODE	<p>P55/60 – Table 4M</p> <ul style="list-style-type: none"> SR - Special read type applies to type 4A meters as well as 5 & 6 – all manually read meters EI – Applies to VICAMI (likely type 5) and any other type 5 remote installations NI – inconsistent with meter churn rules NB – not allowed in new framework 			Refer to section 4.104
174.	Active Stream	4.13	READ TYPE CODE	<p>Table 4, SP, should apply to manually read meters which includes type 4a, but MR is the key distinction NI – is this still relevant? MP cannot be changed during transfer process, breach of churn rules, this should be removed</p>			Refer to section 4.104

POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE	
				NB – remove, no new basic meters				
175.	ActewAGL	4.13	READ TYPE CODE	Table 4-M will code NB still be allowed as no one can install an accumulation meter?			Refer to section 4.104	
176.	AusNet Services	4.13	READ TYPE CODE	<p>AusNet Services believe read type codes of RR and SP should be made available to the meters that meet the minimum spec. Currently VIC AMI use both of these codes. RR allows for a transfer the next time you read the meter, whether you read it daily or weekly or quarterly, SP allows for a customer to specify a date they would like to transfer on. Applying SP to the min spec meters will allow the service provider to read the meter on the specified date and complete the transfer. This could or could not be done in conjunction with a service request.</p> <p>Not allowing these read types for the min spec meters may disadvantage customers (particularly the ones who want to transfer on a specified date)</p> <p>Table 4N is incorrect for VIC AMI NS, RR and SP should be available at a minimum to VIC AMI, (NS because we have to provide a NSRD under the VIC AMI spec) These could also be</p>		<p>(h) AusNet Services believes this clause should be removed as it does not align with the MRP. These read type codes only are used for a FRMP transfer and not a meter change. As under the rules the new FRMP is only allowed to nominate new roles (MDP, MP and MC) with the meter changing as soon as practical after the transfer of load. We also believe with the introduction of this rule the read type code of NI cannot be used and should be removed.(j) We believe this clause should be reworded.</p> <p>New wording The combinations of Read Type Codes, Metering Installation Type Codes and Change Reason Codes that can be valid, (provided the Read Type Code is allowed in a Jurisdiction), are specified in Table 4-NT. (The Metering Installation Type Code referred to here is the code for the existing metering record.) but the metering installation type may be being changed as part of the transfer.)</p>	Agreed	<p>AEMO clarifies that there are no rules in MSATS controlling the use of the Read Type Code, and that the Read Type Code is an instruction from the requesting FRMP to the MDP, nominated in the Change Request to assist the transfer by using the specified reading method.</p>

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				<p>expanded to the new min spec meters as per our previous comment.</p> <p>Error correction in this table for NB this has a Yes against it for MRIM this is incorrect as it's only available to Basic meters.</p>			NB read type code will be deleted as there will ne accumulation meters installed under the rule change
177.	Red Lumo	4.13	READ TYPE CODE	<p>Inconsistent application of 'End User' rather 'Consumer', i.e. should the name of the code be 'End User Read' rather than 'Consumer Read'?</p> <p>Consumer has been updated within table 4-N.</p> <p>+++++</p> <p>Code NI = New Interval Meter</p> <p>Is this code valid in the future as the New FRMP cannot churn a meter prior to becoming the FRMP.</p>			<p>It should be Consumer Read to align with what CATS stands for</p> <p>Refer to section 4.104</p>
178.	Momentum	4.13	READ TYPE CODE	•The meter type codes clause can we reworded.			How?
179.	AGL	4.14	FIELD VALIDATION RULES	<p>CI(a)</p> <p>(a) The Field Validation Rules are based on data source codes, such as "RI" and "OI".</p> <p>Remove examples and refer to table 4</p>			Agreed.
180.	Active Stream	4.14	FIELD VALIDATION RULES	(a) replace "such as RI and OI" with " as per table 4			Agreed.
181.	Ausgrid	4.16	MAINTENANCE OF CODES AND RULES	Add: "Network Tariff Code" to the table. This is existing functionality			Agreed
182.	Endeavour Energy	4.16	MAINTENANCE OF CODES AND RULES	<p>Procedural improvement: Network Tariff should be added to the table in clause 4.16 because it is currently maintained in MSATS.</p> <p>Procedural improvement: The data fields called Controlled Load and Time Of Day should be added to the table in clause 4.16. These fields are currently mandatory but there is no list of allowed values which means that various values with different structure and meaning are populated. These two data fields are important to distinguish the type of service provided to the customer. Currently this is not an issue in the industry because currently the MP and LNSP for domestic customers is generally the same organisation. Therefore mapping of metering, services and tariffs are managed together at the same time. With the introduction of metering competition there is a need for better communication from the MP about the metering, services and tariffs. We would suggest that the data fields called Controlled Load and Time Of Day have a list of industry defined allowable values that MSATS can store and validate against.</p> <p>Consultation on the allowable values is required and we would suggest that the allowable values for Controlled Load should include 'Yes' or 'No'.</p>			<p>Agreed</p> <p>Refer to section 4.940</p>

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				The allowable values for Time Of Day should include 'AllDay', 'Peak', 'Shoulder', 'OffPeak', 'CL1', 'CL2'			
183.	Ausgrid	4.17	DATASTREAM STATUS CODE	Clause (d): Should read “.... metering data is expected”			AEMO requires more information with regards to what the participant is requesting, and will contact the participants after publishing the draft determination to clarify.
184.	AGL	4.17	DATASTREAM STATUS CODE	Cl(b) (b) The Datastream Status Code makes use of the 'active' and 'inactive' codes specified in Table 4-1 Remove examples 'active' and 'inactive'			Agreed.
185.	Active Stream	4.17	DATASTREAM STATUS CODE	(b) remove “'active' and 'inactive'”			Agreed.
186.	Ausgrid	4.18	EMBEDDED NETWORK CODES AND RULES	Clause (c): The obligation should be on the ENM not the LNSP. The ENM must be the NSP2 on the parent NMI.			Refer to section 4.3
187.	Endeavour Energy	4.18	EMBEDDED NETWORK CODES AND RULES		<p>Procedural improvement: Section 4.18 should use terms that are defined in the glossary. We would suggest using the term Embedded Network Code instead of Parent Name</p> <p>Procedural improvement: Only one party should be allowed to update the Embedded Network Code on the Parent NMI. We would suggest that this be the LNSP, therefore clause 4.18.b should be reworded to 'The LNSP must create an Embedded Network Code that comply with the Embedded Network Code Structure defined in the Allocation of Embedded Network Codes document.' and a new clause added after this stating 'The LNSP must provide the Embedded Network Code to AEMO as per the Allocation of Embedded Network Codes document.'</p> <p>Procedural improvement: Only one party should be allowed to update the Embedded Network Code on the Parent NMI. We would suggest that this be the LNSP, therefore clause 4.18.c should be re worded to 'The LNSP must allocate the Embedded Network Code for the Parent NMI'</p>		<p>Agreed</p> <p>Agreed, but will be drafted differentlyRefer to section 4.10</p> <p>Agreed, but will be drafted differently</p>

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
					Procedural improvement: Only one party should be allowed to update the Embedded Network Code on the Child NMI. We would suggest that this be the ENM, therefore clause 4.18.d should be reworded to 'The ENM must allocate the Embedded Network Code of the Parent NMI to the Child NMI'		Agreed, but will be drafted differently Agreed
188.	AGL	4.18	EMBEDDED NETWORK CODES AND RULES		Clarity here Can this only be the LNSP, not the defined term LNSP, which includes the ENM		Yes this is only the LNSP and it does not include the ENM
189.	AusNet Services	5	CODES AND RULES FOR OTHER TRANSACTION TYPES	AusNet Services believes a reference to table 3A would be relevant/helpful here particularly to new entrants as there is not a technical guide to MSATS. A statement at the start of the section: Refer to table 3A for all transaction types. 5.8 is incorrect we don't believe you can commence a status, a status is an end point you cannot start a status. We believe current wording is more accurate.			. Transaction Types will be deleted from MSATS CATS Section 5 as it is mentioned in MSATS CATS section 3.3 Transaction Types
190.	AGL	5.5	WITHDRAW AN OBJECTION	Re-instate clause (c) to lend context to remaining point			Transaction Types will be deleted from MSATS CATS Section 5 as it is mentioned in MSATS CATS section 3.3 Transaction Types
191.	Active Stream	5.5	WITHDRAW AN OBJECTION	(c) Should be re-instated to match 5.4. Also, without (c) (a) is a statement that does not seem to fit. Consider re-wording or removing			Transaction Types will be deleted from MSATS CATS Section 5 as it is mentioned in MSATS CATS section 3.3 Transaction Types
192.	ActewAGL	5.5	WITHDRAW AN OBJECTION	Reinstate this sentence as (a) it is the only sentence that had meaning (a) The Participant who initiated the objection may withdraw the objection at any time prior to the Change Request reaching the Completed status. old new (a) I would have thought this applied to 5.3, 5.4, 5.5 as all get notified with any change in status			Transaction Types will be deleted from MSATS CATS Section 5 as it is mentioned in MSATS CATS section 3.3 Transaction Types
193.	AGL	5.6	REQUEST A NMI DISCOVERY SEARCH	Cl(b) Is ...'the NMI characters' meant to be 'the NMI' ?			Transaction Types will be deleted from MSATS CATS Section 5 as it is mentioned in MSATS CATS section 3.3 Transaction Types
194.	Active Stream	5.6	REQUEST A NMI DISCOVERY SEARCH	(b) Suggest this should state NMI , not NMI characters			Transaction Types will be deleted from MSATS CATS Section 5 as it is mentioned in MSATS CATS section 3.3 Transaction Types
195.	Pacific Hydro	5.7	PROVIDE A NMI DISCOVERY SEARCH RESPONSE	Need to include the transaction type code as it is referenced in the new (a).			Transaction Types will be deleted from MSATS CATS Section 5 as it is mentioned in MSATS CATS section 3.3 Transaction Types
196.	Pacific Hydro	5.8	PROVIDE A CHANGE REQUEST RESPONSE	Need to include the transaction type code as it is referenced in the new (a).			Transaction Types will be deleted from MSATS CATS Section 5 as it is mentioned in MSATS CATS section 3.3 Transaction Types

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				installations where the transfer will complete automatically on the Proposed Transfer Date unless a party objects (ie removing the need for the CR1500). The CR would require a read type code of 'EI'.			AEMO requires more participant support specially from retailers with regards to creating a new change retailer change request
203.	Active Stream	6	CHANGE RETAILER – SMALL OR LARGE NMI	6.1 (a) beginning should read “A NMI transfers from a Tier 1....”			Agreed.
204.	Ausgrid	6.2	INITIATION RULES	6.2.(i) The FRMP is not entitled to nominate the MDP in the CR1000 transaction. The MDP (MPB, MPC etc) must be nominated by the MC under the new rules. Ausgrid request AEMO to remove the creation of the Service Provider roles from the CR10xx transactions. Participants who add the MPB, the MDP and/or the MPC in a CR10xx should have their transaction Objected. AEMO must supply new Objection Codes for the new and current MDP / MPB if Service Provider Roles are not restricted.			Refer to section 4.67
205.	Pacific Hydro	6.2	INITIATION RULES	Suggest the 'FRMP Obligations' be re-established as a heading. It appears other sections continue to use this heading.			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback
206.	Energy Australia	6.2	INITIATION RULES	This section needs to be reformatted as the introduction should follow the heading and not be placed after (d) “a new FRMP may initiate a change Request....”			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback
207.	AGL	6.2	INITIATION RULES	Wording is poor in this section If the party is the New FRMP then they have already initiated the change request. Should be 'A party...'			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback
208.	AGL			Order of obligations – Explicit Informed Consent is the starting point			EIC is not a CATS requirement.
209.	AusNet Services	6.2	INITIATION RULES	The statement says: a New FRMP may initiate a Change Request to effect a change of <i>retailer</i> by carrying out the following actions: The table in h is a table of mandatory fields in MSATS so this table cannot sit under a statement that says may it needs to be a must. Also to make it consistent with the rest of the document remove the Its' in front of ParticipantID (i) Is also a must not a may 6.3.3 We do not believe this clause is relevant for this section. This is about the transfer of a FRMP not changes to other roles. We suggest it should be worded to the effect of: The new MC must: ensure MDP, MPC and MPB roles are correct and if not raise appropriate Change Request to update. Refer to section 29 to 36 for Change Request types for Role Changes.			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback Refer to section 4.67
210.	Ausgrid	6.3	OTHER OBLIGATIONS	Clause 6.3.2 (b): Delete paragraph 2. Clause 6.3.2 (g) (3): If transfers on estimated/substituted readings are allowed to proceed, we need a new substitution method to pro-rata Basic meter readings in the event the next Actual is lower than the Final created for the transfer. Same problem with ROLR. ER is only acceptable for manually read meters (type 4a, 5 and 6).			AEMO recommends participants to look at the metrology and SLP procedures for details on substitution and estimation methods

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				<p>Clause 6.3.2 (g) (4): What is the process by which the new FRMP advises the MDP? The obligation should be on the FRMP to provide the reading to the MDP, not the MDP to obtain it. There should be no obligation on the MDP to use the customer read in the event it fails validation. CR is only acceptable for type 6 metering?</p> <p>Clause 6.3.3: The obligation on the MC does not belong under the 10xx section. The MC obligation should be shown under the relevant Change Requests 6xxx.</p> <p>The procedure is stating how the change requests are structured by using, 6300 and 6700 (should be a CR6800). The nomination of the MDP is also required.</p> <p>The MDP should be given the ability to raise a Change Request to confirm the Actual Change Date for the CR 6200. This would be in line with CR6800 functionality. The two Change Requests perform the same task from an MDP perspective.</p> <p>AEMO to consider the removal of CR62xx, 63xx, 67xx Change Requests and only use the CR6800 with special conditions dependent on the roles updated.</p>		<p>The statement “6.3.3.(c) Ensure that the name of the New MDP is recorded in MSATS using Change Reason Code 6200 prior to the Actual Change Date. “ is misleading. If an MC puts in a Prospective 6200 the MDP would always object, because the MDP party cannot ensure a prospective date is the day that a meter exchange occurs. CR6200 is rarely used today, clauses need to updated to support the new Meter Replacement rules to ensure MDP and MPB can only be updated on the meter exchange date.</p>	<p>AEMO will be deleting this clause as it is not an MDP Obligation</p> <p>Refer to section 4.67</p>
211.	Energy Australia	6.3	OTHER OBLIGATIONS	We have a concern that the new MC cannot make these changes until they are the MC			The obligations listed in CR10xx for the Metering coordinator are mainly for them raising CR6xxx which normally the new role raises to become the current role
212.	AGL	6.3	OTHER OBLIGATIONS	P68 – Cl 6.3.3 (a) Isn't clause (a) this an optional activity for the MC and how does it relate to section 6.4.2		P67 – clause 6.3.2 (e) Can the MDP be responsible for retrospective changes if they were not MDP at the time of the change ?	<p>Refer to section 4.67</p> <p>No, the MDP must be the current MDP in the period that the change request covers</p>
213.	AGL			P67 – cl(b) Remove NMI classification of LARE The key issue is how the meter is read – remotely or manual Change will be the proposed date for remote and the read date for manual meters			AEMO does not agree as the MDP must still provide Actual Change Date for a Large Site
214.	AGL			P67 – cl(c) This clause needs re-work and applies to the MSATS status – eg PEND date			AEMO does not agree with this comment as the MSATS status is not relevant in the context of this clause.
215.	AGL			P67 – clause (g)(i) Badly worded Why can the MDP object to a Special Read date being outside the 2 day window of the NSRD Possibly they should object if it is outside the NSRD window			Agreed Special Read Date will be deleted as it is irrelevant..

POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				Are type 4 meters expected to be read every day ? Review and align with Read Type Code			AEMO suggests participant refers to SLP MDP
216.	AGL			P67 – clause (g)(5) Why isn't remote type 5 included in the list ?			AEMO clarifies that the definition of type 5 is not remote read meter.
217.	AGL			P68 – 6.3.3 CI (a) Obligation should sit with FRMP A change of MC does not mean a change of MPB, MPC, MDP and therefore this cannot be an obligation Obligation is to ensure that names of MPB MPC, MDP are recorded in MSATS			Refer to section 4.67
218.	Active Stream	6.3	OTHER OBLIGATIONS	6.3.2 (b) second paragraph – suggest moving away from the Large/Small classification for dictating when this is done to how the meter is read. Whether or not the meter is remotely read is the defining factor for applying a date to update MSATs from, not the classification (c) Suggest that it should be within 2 days of the proposed date and data request received, whichever is later (e.g. may go to PEND before proposed date is reached). It cannot be within 2 days of the actual change date as this process is trying to create the ACD. (f) same as (b) (g) 3&4 remove indentation (g) 6, this is what the 15ERR should state for prospective. However, Active Stream believe both would be better being termed around once a CR has gone to PEND and meter installed, whichever is later. (1) technically within 2 days of going PEND & NSRD 6.3.3 The MC can also use 68XX, so why isn't it detailed? 6.3.3. (b) should be may , the roles may not require changing. (a),(b) & (c) do not belong in a CR1XXX section, they belong in 63xx, 62xx and 67xx			AEMO does not agree as the MDP must still provide Actual Change Date for a Large Site AEMO does not agree with this comment as the MSATS status is not relevant in the context of this clause. Agreed AEMO does not agree with this comment as the MSATS status is not relevant in the context of this clause. Refer to section 4.67
219.	Red Lumo	6.3	OTHER OBLIGATIONS	6.3.1 Current FRMP The Current FRMP must, on receipt of a request from the New FRMP for an agreement to retrospectively transfer on a previous Meter Reading, respond to the request within 2 <i>business days</i> . Clarification required as to what constitutes a request as highlighted above. +++++++ 6.3.3 New Metering Coordinator The New MC must: (a) Change the Current MC using Change Reason Code 6300 if this change has not been performed by the New FRMP.			AEMO clarifies that how the request is communicated is up to the agreement between the parties. Clause 6.3.3(a) will be deleted as it is not relevant under CR1000 series.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				Should this be a retrospective change request, i.e. CR6301 as the New FRMP did not nominate the Current MC?			
220.	Powershop	6.3	OTHER OBLIGATIONS	<p>6.3 Other Obligations</p> <p>6.3.1 Current FRMP</p> <p><u>The Current FRMP must:</u> 6.3.1.1 In respect of a request from the New FRMP for an agreement to retrospectively transfer or a previous Meter Reading, respond to the request within 7 business days.</p> <p>Powershop: would prefer to keep this obligation at 5 business days.</p>			Refer to section 4.78
221.	Ausgrid	6.4	OPTIONAL REQUIREMENTS	<p>6.4.1 The NEW FRMP is not entitled to nominate the MPB or MPC in the CR1000 transaction. The MPB, MPC must be nominated by the MC under the new rules.</p> <p>Ausgrid request AEMO to remove the creation of the Service Provider roles from the CR10xx transactions. Participants who add the MPB, the MDP and/or the MPC in a CR10xx should have their transaction Rejected.</p>			Refer to section 4.67
222.	AGL	6.4	OPTIONAL REQUIREMENTS	<p>See comment regarding 6.3.3 clause (a)</p> <p>These requirements lead to ambiguity</p> <p>A new FRMP cannot change the roles, only the existing FRMP can change the roles.</p>			Refer to section 4.67
223.	Active Stream	6.4	OPTIONAL REQUIREMENTS	<p>6.4.1(a) suggest removing to reduce ambiguity. While the CR can handle this information, you would be in breach of churn rules if you change the MP</p> <p>6.4.2 Suggest 'Current MC', not 'New MC'</p>			Refer to section 4.67
224.	AusNet Services	6.4	OPTIONAL REQUIREMENTS	<p>6.4.2 covered in the must section using the suggested wording.</p>			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback
225.	Pacific Hydro	6.5	TIMEFRAME RULES	<p>It is strongly suggested the objection logging period remain at 5 days. Reducing it to one day, with an influx of new market MC entrants whose systems may not be to the level of sophistication as some participants and who may be relying on manual processes, will only lead to error and rework across the market.</p>			Refer to section 4.78
226.	AGL	6.5	TIMEFRAME RULES	<p>P71 – Timeframe rules</p> <p>1 business day to object is inadequate and will lead to a higher level of erroneous transfers</p>			Refer to section 4.78
227.	Red Lumo	6.5	TIMEFRAME RULES	<p>Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.</p>			Refer to section 4.78
228.	Powershop	6.5	TIMEFRAME RULES	<p>would prefer to keep this requirement at 5 business days.</p>			Refer to section 4.78
229.	Ausgrid	7.1	APPLICATION [1021 1022 1023 1024 1025 1026 1027 1028 1029]	<p>See comments as per 10xx above. The FRMP must not nominate Service Provider Roles.</p>			Refer to section 4.67
230.	Pacific Hydro	7.1	APPLICATION [1021 1022 1023 1024 1025 1026 1027 1028 1029]	<p>1024 – Transfer missed This code is to be used is a situation where...</p> <p>1025 – Transferred in Error This code it to be used is a situation where...</p>			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE									
				<p>1026 – Cooled Off This code it to be used is a situation where...</p> <p>1027 – Customer Moves Out on or before CR completion date This code is to be used is a situation where...</p> <p>1028 – Non-account holder signs contract This code is to be used when a A person...</p>												
231.	AGL	7.1	APPLICATION [1021 1022 1023 1024 1025 1026 1027 1028 1029]	No context to paragraph These CRs are not sub-types of 1020 Be consistent in use of tables			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback									
232.	Active Stream	7.1	APPLICATION [1021 1022 1023 1024 1025 1026 1027 1028 1029]	There is no context to the first paragraph. Suggest something similar to “These CRs are not sub types of 1020”			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback									
233.	AGL	7.3	INITIATION RULES	A new FRMP has already initiated the change request and therefore the use of ‘may’ is incorrect			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback									
234.	Powershop	7.3	INITIATION RULES	<p>7.3 Initiation Rules A New FRMP may initiate a Change Request to effect a change of retailer in accordance with clause section 7.4.</p> <p>(a) The New FRMP must use one of the following Change Reason Codes: 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028 or 1029 to establish an initial Change Request.</p> <p>would prefer the change reason codes remain for clarity in section 7.4.</p>			This is repeating content from section 7.1. The change is not necessary.									
235.	Ausgrid	7.4	FRMP OBLIGATIONS	Remove statements regarding Next Scheduled Read Date and Special Read Date. All 102x transactions must transfer on previous readings.			Agreed.									
236.	Momentum Energy	7.4	FRMP OBLIGATIONS	<p>(f)(h) populate the initial Change Request and provide with the following information with the Change Request:</p> <table border="1"> <tr> <td>Change Reason Code</td> <td>Participant transaction ID</td> <td>NMI and NMI Checksum</td> </tr> <tr> <td>Their Participant ID</td> <td>Proposed Change Date</td> <td>New RP</td> </tr> <tr> <td>Read Type Code</td> <td></td> <td></td> </tr> </table> <p>RP to be replaced with MC</p>	Change Reason Code	Participant transaction ID	NMI and NMI Checksum	Their Participant ID	Proposed Change Date	New RP	Read Type Code					AEMO does not agree to this comment as MC will remain in MSATS as the RP role id
Change Reason Code	Participant transaction ID	NMI and NMI Checksum														
Their Participant ID	Proposed Change Date	New RP														
Read Type Code																
237.	Pacific Hydro	7.4	FRMP OBLIGATIONS	These were included under the ‘Initiating Rules’ in section 6. The formatting needs to be consistent.			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback									
238.	AGL	7.4	FRMP OBLIGATIONS	EIC is the key requirement before initiating any change request			This is not a CATS requirement.									
239.	AGL			<p>CI(d) Remove MDP from table Only the current MC can change this role</p>			Refer to section 4.67									
240.	AGL			<p>CI(f) This is a retrospective change. The change date must be a date when an actual read is available</p>			Agreed, clause will be deleted as it is not relevant									
241.	AGL			<p>CI(h) Remove MPB, MPC to reduce ambiguity</p>			Refer to section 4.67									

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
242.	Active Stream	7.4	FRMP OBLIGATIONS	(d) Remove MDP from table, the CR should be routed to the relevant MDP. Otherwise should be Current MDP (f) All these CRs are retro, so there is no chance of “obtaining” a read. As such, wouldn't it be better if the MDP just advise the actual date they can provide a read from? I.e. if RRIM, can be any date after current MDP meter installed. If MR, then whatever date the last read was taken (h) remove MPB and MPC, ambiguity			Refer to section 4.67 Agreed, clause will be deleted as it is not relevant
243.	AusNet Services	7.4	FRMP OBLIGATIONS	(d) to make it consistent with the rest of the document remove the Its' in front of ParticipantID			AEMO will update all occurrences of Participant ID to Its Participant ID as it is clearer
244.	Ausgrid	7.5	MDP OBLIGATIONS	Remove statements regarding Next Scheduled Read Date and Special Read Date. All 102x transactions must transfer on previous readings.			Agreed.
245.	AGL	7.5	MDP OBLIGATIONS	Cl(d),(h),(i) Window for NSRD and Special Read not relevant for a retrospective change			Agreed.
246.	Active Stream	7.5	MDP OBLIGATIONS	(d) not relevant, retro (h) + (i) 1500s not require for this CR type (j) remove “(Part A & B)”			Agreed.
247.	AGL	7.6	METERING COORDINATOR OBLIGATIONS	Cl(b) Ensure that the ‘names’ Change name to ‘participant ID’			Agreed.
248.	AGL			The Current MC and New MC may Change to current or new			Agreed.
249.	Active Stream	7.6	METERING COORDINATOR OBLIGATIONS	(c) Is “names” the best term? Isn't participants more prescriptive?			Agreed.
250.	AusNet Services	7.6	METERING COORDINATOR OBLIGATIONS	We do not believe this clause is relevant for this section. This is about the transfer of a FRMP not changes to other roles. We suggest it should be worded to the effect of: The new MC must: ensure MDP, MPC and MPB roles are correct and if not raise appropriate Change Request to update. Refer to section 29 to 36 for Change Request types for Role Changes. (c) can then be deleted as its covered in the new wording			Refer to section 4.67
251.	Red Lumo	7.6	METERING COORDINATOR OBLIGATIONS	Inconsistent application of acronym. All other roles are represented as an acronym e.g. 7.5 MDP Obligations, whereas this role has not, i.e. Metering Co-ordinator rather than MC.			Agreed.
252.	Pacific Hydro	7.7	TIMEFRAME RULES	As per the comment in 6.5.			Refer to section 4.78
253.	AGL	7.7	TIMEFRAME RULES	P77 – Table 7A 1 business day is inadequate for consider an objection			Refer to section 4.78
254.	Red Lumo	7.7	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
255.	Powershop	7.7	TIMEFRAME RULES	would prefer to keep the objection logging period at 5 business days.			Refer to section 4.78
256.	Active Stream	8.2	CONDITIONS PRECEDENT	Not present in section 6, consistency.			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback
257.	AGL	8.3	INITIATION RULES	Wording of these clauses should be reviewed. There is no need for the FRMP to populate the MPB, MPC participant IDs.			AEMO requires more information with regards to what the participant is requesting, and will contact the participants after publishing the draft determination to clarify. Refer to section 4.67
258.	Ausgrid	8.4	FRMP OBLIGATIONS	As per previous comments, the FRMP is not entitled to nominate the Service Provider Roles.			Refer to section 4.67
259.	Active Stream	8.4	FRMP OBLIGATIONS	(j) see earlier comments re not changing MP on retail transfer, misleading regarding churn rules			Refer to section 4.67
260.	AusNet Services	8.4	FRMP OBLIGATIONS	(e) to make it consistent with the rest of the document remove the Its' in front of ParticipantID			See earlier comments.
261.	Active Stream	8.5	MDP OBLIGATIONS	(b) Is it on receipt of a data request, OR - On receipt of a data request, the CR status is PEND and meter is installed, whichever date is later. (e) same as above essentially, must be PEND			Change Request status is irrelevant in this clause
262.	AGL	8.6	METERING COORDINATOR OBLIGATIONS	The FRMP has the obligation, not the MC.			Refer to section 4.67
263.	Active Stream	8.6	METERING COORDINATOR OBLIGATIONS	MC can also use 68XX (b) change Names to Participant ID's However, these obligations really belong in the relevant CR section			Refer to section 4.67
264.	AusNet Services	8.6	METERING COORDINATOR OBLIGATIONS	We do not believe this clause is relevant for this section. This is about the transfer of a FRMP not changes to other roles. We suggest it should be worded to the effect of: The new MC must: ensure MDP, MPC and MPB roles are correct and if not raise appropriate Change Request to update. Refer to section 29 to 36 for Change Request types for Role Changes. The new MC may is covered in the must section.			Refer to section 4.67
265.	Red Lumo	8.6	METERING COORDINATOR OBLIGATIONS	Inconsistent application of acronym. All other roles are represented as an acronym e.g. 8.5 MDP Obligations, whereas this role has not, i.e. Metering Co-ordinator rather than MC.			Agreed.
266.	Pacific Hydro	8.7	TIMEFRAME RULES	As per the comment in 6.5.			Refer to section 4.78
267.	AGL	8.7	TIMEFRAME RULES	P99 – timeframe rules 1 b/day to object is inadequate			Refer to section 4.78
268.	Red Lumo	8.7	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
269.	Powershop	8.7	TIMEFRAME RULES	would prefer to keep the objection logging period at 5 business days.			Refer to section 4.78

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
270.	AusNet Services	8.8	OBJECTION RULES		AusNet Services believe the LNSP (N) should have an ability to object to the change request in the case of being allocated incorrectly. Eg the ENM selects the incorrect LNSP participant id.		This CR is for change retailer and the LNSP/ENM is not selected in this CR.
271.	Pacific Hydro	9.1	APPLICATION [1500]	1500 – Provide Actual Change Date (MDP) This is the situation where t The MDP is required to provide...			Agreed
272.	AGL	9.2	CONDITIONS PRECEDENT	This section should stipulate every scenario in which a CR 1500 is appropriate. There is inadequate information for business processes and system rules.			AEMO needs to understand why there is a compelling case for this to occur
273.	Active Stream	9.2	CONDITIONS PRECEDENT	Suggest that this document actually stipulated where a 1500 is required, what are the prerequisite's etc. These are conditions precedent.			AEMO needs to understand why there is a compelling case for this to occur
274.	Active Stream	9.4	MDP OBLIGATIONS	(c) See earlier comments, CR status at PEND is key – also, within 2 days of what notification? A data request tells the relevant part that a CR has gone to PEND, but depending on the CR, the relevant party will not always know within 2 days what the actual change date should be. I.e. for a 6800 requiring a change of meter, CR could go PEND on day 6, but meter not installed until day 20.			Change Request status is irrelevant in this clause
275.	Active Stream	9.5	TIMEFRAME RULES	Statement could be a lot clearer. The impact is that, if the CR is not raised within these 20 days, a new CR1xxx or 6XXX has to be raised. Again, status at PEND and meter install dates are key			Obligation is still 2 days as per the previous clause Change Request status is irrelevant in this clause
276.	Ausgrid	10.1	APPLICATION [2000 2001 2003]	Delete CR2003.			Refer to section 4.67
277.	Origin	10.1	APPLICATION [2000 2001 2003]	2003 – Create NMI Details – Retrospective (Tier 1 only) This is where the New LNSP establishes the initial set of information in MSATS in regard to a connection point for a Tier 1 Site to apply from a Retrospective Day. .# Remove options for XX03 transaction as the notifications do not go to the LR			Refer to section 4.67
278.	Pacific Hydro	10.1	APPLICATION [2000 2001 2003]	2001 – Create NMI Details – Retrospective Remove 'in' that occurs before 'about'. 2003 – Create NMI Details - Retrospective (Tier 1 only) Remove 'in regard to' and replace with 'about'. This is consistent with the other clauses.			Agreed
279.	Endeavour Energy	10.1	APPLICATION [2000 2001 2003]	Procedural improvement: We would suggest deleting CR 2003. See comments for section 4.2 above.			Refer to section 4.67
280.	ActewAGL	10.1	APPLICATION [2000 2001 2003]	Refer to 2.3 argument and see reinforced further below Rules 7.2.1 (3), 7.8.2 (c) (1), 7.8.2 (d) would indicate a NMI already exists 7.13.1 would infer that the NMI should already be in MSATS for a retailer to discover 7.8.2 (c) & (d) would then be less onerous if the NMI was in MSATS, and would enhance metering timeframes and allow automation for the retailer			Refer to section 4.67

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				Other clauses that would also infer the NMI already exists 7.2.1 (a) (3); 7.13.3			
281.	Ausgrid	10.4	LNSP Obligations	Under the rules the LNSP can only update the LNSP, FRMP, MC (optional), LR and RoLR. Changes to the NMI Creation procedure are required to support the new rules.			Refer to section 4.67
282.	Ausgrid	10.4	LNSP Obligations	LNSP must populate all Roles in NMI creation. B2B SO Allocate NMI must support this process. The FRMP raising an Allocate NMI must populate all Roles required or the NMI Creation process to MSATS must change to only require LNSP and FRMP with MC as optional.			Refer to section 4.67
283.	ActewAGL	10.4	LNSP Obligations	Remove from table in (c) the following: FRMP, RP, MDP, MPB, MPC, and move to table in (f). The rules above at 10.1 implies a NMI already exists in the LNSP system so why not publish to expedite transfers			Refer to section 4.67
284.	Pacific Hydro	10.6	TIMEFRAME RULES	As per the comment in 6.5.			Refer to section 4.78
285.	Transgrid	10.6	TIMEFRAME RULES	TransGrid would prefer the Objection Logging Period for large NMI's to remain at 5 days. TransGrid does not have automated B2B software that flags objections, all CATS generated xml files are manually read. One day to respond is considered too short.			Refer to section 4.78
286.	Energy Australia	10.6	TIMEFRAME RULES	Objection logging for large NMIs. We question why the reduction in objection timing has been reduced from 5 to 1 day as this does not allow time batch processing and will cause automated objections. This will increase the number of objections.			Refer to section 4.78
287.	AGL	10.6	TIMEFRAME RULES	More clarity required. If the CR is not completed, then a new CR is required. 1 b/day to object is inadequate			Refer to section 4.78
288.	Red Lumo	10.6	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
289.	Powershop	10.6	TIMEFRAME RULES	would prefer no change to current timing.			Refer to section 4.78
290.	Red Lumo	10.7	OBJECTION RULES	Recommendation for the reinstatement of the New RoLR to submit an objection. In the situation where a participant has been nominated in error the relevant objection can be submitted.			AEMO needs sufficient reasons and details for the participant request
291.	Ausgrid	11.1	APPLICATION [2020 2021]	See comments as per 20xx.			Refer to section 4.67
292.	Ausgrid	11.4	ENM Obligations	Under the rules the ENM (LNSP Role) can only update the LNSP, FRMP, MC (optional), LR and RoLR. Changes to the NMI Creation procedure are required to support the new rules.			Refer to section 4.67
293.	Lendlease	11.4	ENM Obligations		Although section 2.11 states the ENM is to ensure the availability of the network tariff code, it is not mentioned in the available options here.		Refer to section 4.89
294.	Endeavour Energy	11.4	ENM Obligations		Procedural improvement: There should be an obligation on the ENM to nominate themselves as the LNSP, similar to the existing clause 10.4.d. MSATS should validate		Agreed.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
					this obligation and reject the Change Request if the ENM did not nominate themselves as the LNSP.		
295.	ActewAGL	11.4	ENM Obligations	In (c) is ENM a new field in MSATS? Add footnote that in Child NMI's, LNSP = ENM Add the following as new (d) Nominate itself as the New LNSP.			AEMO note this comment and will clarify the difference between the ENM and the LNSP in the CR.
296.	Pacific Hydro	11.6	TIMEFRAME RULES	As per the comment in 6.5.			Refer to section 4.78
297.	Transgrid	11.6	TIMEFRAME RULES	TransGrid would prefer the Objection Logging Period for large NMI's to remain at 5 days. TransGrid does not have automated B2B software that flags objections, all CATS generated xml files are manually read. One day to respond is considered too short.			Refer to section 4.78
298.	Energy Australia	11.6	TIMEFRAME RULES	Objection logging for large NMIs. We question why the reduction in objection timing has been reduced from 5 to 1 day as this does not allow time batch processing and will cause automated objections. This will increase the number of objections.			Refer to section 4.78
299.	AGL	11.6	TIMEFRAME RULES	1 b/day to object is inadequate			Refer to section 4.78
300.	Red Lumo	11.6	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
301.	Powershop	11.6	TIMEFRAME RULES	would prefer no change to current timing.			Refer to section 4.78
302.	AusNet Services	11.7	OBJECTION RULES		AusNet Services believe the LNSP (N) should have an ability to object to the change request in the case of being allocated incorrectly. Eg the ENM selects the incorrect LNSP participant id.		New clause will be added to clarify that the ENM must nominate itself as the LNSP on this CR, and hence objection will not be required similar to other CR2000 series.
303.	Ausgrid	12.1	APPLICATION [2500 2501]	Ausgrid believe the 25xx transactions can be removed from use. LNSP and Metering companies should not be aligned to allow a single transaction to be sent.			Refer to section 4.67
304.	United Energy	12.4	LNSP Obligations	Point (c) Table: The following items are no longer LNSP responsibility. Remove from the table - Meter Serial ID, metering Installation Type; Meter Status, register ID, Dial Format, Multiplier; UOM, NMI suffix etc			Refer to section 4.67
305.	Pacific Hydro	12.5	TIMEFRAME RULES	As per the comment in 6.5.			Refer to section 4.78
306.	Transgrid	12.5	TIMEFRAME RULES	TransGrid would prefer the Objection Logging Period for large NMI's to remain at 5 days. TransGrid does not have automated B2B software that flags objections, all CATS generated xml files are manually read. One day to respond is considered too short.			Refer to section 4.78
307.	Energy Australia	12.5	TIMEFRAME RULES	Objection logging for large NMIs. We question why the reduction in objection timing has been reduced from 5 to 1 day as this does not allow time batch processing and will cause automated objections. This will increase the number of objections.			Refer to section 4.78
308.	AGL	12.5	TIMEFRAME RULES	1 b/day to object is inadequate			Refer to section 4.78
309.	Red Lumo	12.5	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78

POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
310.	Powershop	12.5	TIMEFRAME RULES	Powershop: would prefer no change to current timing.			Refer to section 4.78
311.	AusNet Services	Old 13	CREATE NMI – CREATE NMI, METERING INSTALLATION DETAILS AND MDM DATASTREAM FOR EMBEDDED NETWORK (CHILD)– SMALL OR LARGE		AusNet Services question why this was deleted. This could be used by the ENM if they had all of the information required. If the answer is they can use the CR2500/01 then that needs to be made clear in that section.		Refer to section 4.67
312.	Pacific Hydro	Old 13	CREATE NMI – CREATE NMI, METERING INSTALLATION DETAILS AND MDM DATASTREAM FOR EMBEDDED NETWORK (CHILD)– SMALL OR LARGE	Why has this transaction been deleted?			Refer to section 4.67
313.	Ausgrid	13.1	APPLICATION [3000 3001 3003]	All streamline codes e.g. CR3003 should be removed from use. The LNSP and MPB businesses should not be aligned.			Refer to section 4.67
314.	Origin	13.1	APPLICATION [3000 3001 3003]	3003 – Create Meter Details – Retrospective (Tier 1 only) This is where the Current MPB establishes the initial set of information in MSATS in regard to the metering installation details, and there is no associated meter removal for the NMI for the same effective date for a connection point for a Tier 1 Site to apply from a Retrospective Day. # Notifications not sent to participants requiring update such as LR			Refer to section 4.67
315.	Endeavour Energy	13.1	APPLICATION [3000 3001 3003]	Procedural improvement: We would suggest deleting CR 3003. See comments for section 4.2 above.			Refer to section 4.67
316.	Red Lumo	13.1	APPLICATION [3000 3001 3003]	3001 – Create Metering Installation Details – Retrospective This is where the Current MPB establishes the initial set of information in MSATS in regard to the metering installation details, and there is no associated meter removal for the NMI for the same effective date to apply from a Retrospective Day. 3003 – Create Meter Details - Retrospective (Tier 1 only) This is where the Current MPB establishes the initial set of information in MSATS in regard to the metering installation details, and there is no associated meter removal for the NMI for the same effective date for a connection point for a Tier 1 Site to apply from a Retrospective Day. Suggest that the above clause are reverted to the original/current statement, i.e. as per MSATS Procedures: CATS v4.1 as provided below.			AEMO note this comments and will consider it in the second draft of the procedure. Tier 1 only CRs will be deleted from the MSATS CATS procedure.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				<p>3001 – Create Metering Installation Details – Retrospective</p> <p>This is the situation where the current MPB establishes the initial set of information in the MSATS system in regard to the metering installation details, and there is no associated meter removal for the NMI for the same effective date. The date at which the information will apply would be a retrospective date.</p> <p>3003 – Create Meter Details - Retrospective (Tier 1 only)</p> <p>This is the situation where the current MPB establishes the initial set of information in the MSATS system in regard to the metering installation details, and there is no associated meter removal for the NMI for the same effective date for a connection point that is a tier 1 connection point. The date at which the information will apply would be a retrospective date.</p>			
317.	Ausgrid	13.4	MPB Obligations	<p>Ausgrid LNSP is against the mandatory population of Network Tariffs in CR30xx transactions. MPB's will not know the correct tariffs to apply. Incorrect population of Network Tariffs will result in rebilling affecting LNSP and FRMP processes.</p> <p>For example, a customer may 'opt out' of Time Of Use billing in the Ausgrid Network Area. How will an MPB know to apply EA010 instead of EA025. This difference will result in a Network Billing reconciliation issue.</p> <p>Ausgrid request that Network Tariff population is</p> <ul style="list-style-type: none"> a) Mandatory for BASIC, MRIM Metering. b) Excluded for COMMS or MRAM metering. i.e. Must not be populated. <p>Comments apply to all CR30xx transactions</p> <p>Ausgrid does support the addition of a 'Service Type' against each RegisterID for the population by the MPB. Service Types would include i) General Supply ii) Controlled Load iii) Generation.</p>		<p>Ausgrid Metering is against the mandatory population of Network Tariffs in the CR30xx transaction. Our business may work in NSW and VIC and have no interest in keeping reference information for all Network Tariffs across all Networks. Mandatory population of the Network Tariff on COMMS metering will result in higher volumes of Network Billing exceptions.</p>	Refer to section 4.89
318.	SAPN, CitiPower & PowerCor	13.4	MPB Obligations	<p>Following clause used in other sections should be included within 13.4 -</p> <p><i>14.4 (h) - Where changes to Network Tariff information are required:</i></p> <ul style="list-style-type: none"> 1. Check that the Network Tariff Code is correct and, if it is not, update it to have the correct value. 2. Change the Network Tariff Code to ensure that the current information provided in MSATS is the latest information available from the Current LNSP. 			Agreed.
319.	AGL	13.4	MPB Obligations	It should be optional for the MPB to update the tariff code.			Refer to section 4.89
320.	Acumen	13.4	MPB Obligations	Acumen does not agree with the change to Network Tariff Code as a mandatory field as this information may not always be available to the MPB and the MPB is not responsible for the data maintained in the field.			Refer to section 4.89
321.	Active Stream	13.4	MPB Obligations	<p>(C) Making MP update of NTC mandatory has not yet been agreed.</p> <p>Active Stream believes this should be optional for MPs, not mandatory. If LNSPs or FRMP wish for the MP to perform this service, we should be able to charge for it. Furthermore, in order to be effective we would need to be provided with a mapping table of basic to interval NTC's, e.g. NTC B1 =I1</p>			Refer to section 4.89

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
322.	United Energy	13.4	MPB Obligations	Remove from Table (e) MDM Contributory suffix and insert into table (c) MDM Contributory Suffix (For each register ID). The effect of this change is to make it mandatory to ensure that each unique suffix value (eg E1, B1, Q1, K1) for interval meters is properly recorded in MSATS. A change to the document Standing data for MSATS is also required to make the “suffix” value in the Cats_Register_Identifier table mandatory.			AEMO requires more information with regards to what the participant is requesting, and will contact the participants after publishing the draft determination to clarify.
323.	AusNet Services	13.4	MPB Obligations	AusNet Services do not agree with the making of this field mandatory for the MPB. The MPB does not have the understanding of Network tariffs that the LNSP does and cannot be held responsible for a Network tariff. There isn't any obligations on the LNSP to provide the Network tariff to the MPB. AusNet Services believe that updating of information should sit with the participant that has the obligation. We also believe that the Network tariff should sit at NMI level and not metering level.			Refer to section 4.89
324.	Momentum	13.4	MPB Obligations	Why is NTC Mandatory for CR 3000?			Refer to section 4.89
325.	AGL	14.1	APPLICATION [3004 3005]	CR 3005. Change 'Prospective' to 'Retrospective'			Agreed.
326.	Active Stream	14.1	APPLICATION [3004 3005]	3005 is retro, not prospective			Agreed
327.	ActewAGL	14.1	APPLICATION [3004 3005]	CR3005 is for Retrospective changes, not Prospective (this is a CR3004). Fix the wording and change Prospective to Retrospective			Agreed
328.	AusNet Services	14.1	APPLICATION [3004 3005]	Incorrect statement Should read: 3005 – Exchange of Metering information – Retrospective This is where the Current MPB is required to provide a Prospective Respective Change to the information in MSATS in regard to the <i>metering installation</i> details. The change will include the removal of at least one existing <i>meter</i> and the installation of at least one new <i>meter</i> . A minimum set of <i>metering installation</i> details for the <i>NMI</i> shall exist upon completion of the Change Request.			AEMO agrees but the word is 'Retrospective' not 'Respective'.
329.	Ausgrid	14.4	MPB Obligations	See comments for 13.4 Ausgrid LNSP is against the mandatory population of Network Tariffs in CR30xx transactions. MPB's will not know the correct tariffs to apply. Incorrect population of Network Tariffs will result in rebilling effecting LNSP and FRMP processes.			Refer to section 4.89
330.	AGL	14.4	MPB Obligations	It should be optional for the MPB to update the tariff code. Clause (h) contradicts clause (e)			Refer to section 4.89
331.	Acumen	14.4	MPB Obligations	Acumen does not agree with the change to Network Tariff Code as a mandatory field as this information may not always be available to the MPB and the MPB is not responsible for the data maintained in the field.			Refer to section 4.89
332.	Active Stream	14.4	MPB Obligations	see 13.4 (h) contradicts (e) can't be both mandatory and optional			Refer to section 4.89 AEMO agrees to this comment and will be making the changes in the second draft of the procedure

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
333.	United Energy	14.4	MPB Obligations	Remove from Table (f) MDM Contributory suffix and insert into table (e) MDM Contributory Suffix (For each register ID). The effect of this change is to make it mandatory to ensure that each unique suffix value (eg E1, B1, Q1, K1) for interval meters is properly recorded in MSATS.			AEMO does not agree with participant suggestion as AEMO does not consider this is a matter that is relevant to the rule changes as this is an existing issue that is outside the scope of this consultation.
334.	ActewAGL	14.4	MPB Obligations	Section 13.4 and 14.4 should be identical as similar obligations apply and same mandatory fields			Agreed
335.	AusNet Services	14.4	MPB Obligations	AusNet Services do not agree with the making of this field mandatory for the MPB. The MPB does not have the understanding of Network tariffs that the LNSP does and cannot be held responsible for a Network tariff. There isn't any obligations on the LNSP to provide the Network tariff to the MPB. AusNet Services believe that updating of information should sit with the participant that has the obligation. We also believe that the Network tariff should sit at NMI level and not metering level.			Refer to section 4.89
336.	United Energy	14.6	OBJECTION RULES	Objections should be allowed if exchange dates clash – ie date of install should be the day after remove.			AEMO needs more details and information as to what the participant is requesting
337.	Ausgrid	15	MAINTAIN METERING – CHANGE METERING INSTALLATION DETAILS – SMALL OR LARGE	Delete CR 3053			Refer to section 4.67
338.	Endeavour Energy	15.1	APPLICATION [3050 3051 3053]	Procedural improvement: We would suggest deleting CR 3053. See comments for section 4.2 above.			Refer to section 4.67
339.	Ausgrid	15.4	MPB Obligations	See comments for 13.4 Ausgrid LNSP is against the mandatory population of Network Tariffs in CR30xx transactions. MPB's will not know the correct tariffs to apply. Incorrect population of Network Tariffs will result in rebilling effecting LNSP and FRMP processes.			Refer to section 4.89
340.	SAPN, CitiPower & PowerCor	15.4	MPB Obligations	Following clause used in other sections should be included within 13.4 - <i>14.4 (h) - Where changes to Network Tariff information are required: 1. Check that the Network Tariff Code is correct and, if it is not, update it to have the correct value. 2. Change the Network Tariff Code to ensure that the current information provided in MSATS is the latest information available from the Current LNSP.</i>			Agreed.
341.	Energy Australia	15.4	MPB Obligations	(e) Table Ausgrid and AusNet to not currently provide this information.			Refer to section 4.89
342.	AGL	15.4	MPB Obligations	It should be optional for the MPB to update the tariff code.			Refer to section 4.89
343.	Acumen	15.4	MPB Obligations	Acumen does not agree with the change to Network Tariff Code as a mandatory field as this information may not always be available to the MPB and the MPB is not responsible for the data maintained in the field.			Refer to section 4.89
344.	Active Stream	15.4	MPB Obligations	(e) see 13.4			Refer to section 4.89

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
345.	United Energy	15.4	MPB Obligations	Insert into table (e) MDM Contributory Suffix (For each register ID). The effect of this change is to make it mandatory to ensure that each unique suffix value (eg E1, B1, Q1, K1) for interval meters is properly recorded in MSATS,			AEMO does not agree with participant suggestion as this is an existing issue that is outside the scope of this consultation.
346.	ActewAGL	15.4	MPB Obligations	This Section should be set as same as 13.4 and 14.4 as similar obligations apply and same mandatory fields			Agreed
347.	AusNet Services	15.4	MPB Obligations	AusNet Services do not agree with the making of this field mandatory for the MPB. The MPB does not have the understanding of Network tariffs that the LNSP does and cannot be held responsible for a Network tariff. There isn't any obligations on the LNSP to provide the Network tariff to the MPB. AusNet Services believe that updating of information should sit with the participant that has the obligation. We also believe that the Network tariff should sit at NMI level and not metering level.			Refer to section 4.89
348.	United Energy	15.6	OBJECTION RULES	Objections should be allowed if exchange dates clash – ie date of install should be the day after remove.			AEMO needs more information and details as to what the participant is requesting
349.	AGL	16.1	APPLICATION [3080 3081]	This section is a condition precedent as well 'each Meter Serial number ID must exist in MSATS'			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback
350.	Ausgrid	16.2	CONDITIONS PRECEDENT	Ausgrid request the removal of CR308x and CR309x transactions from the CATS Procedures. Effectively these are streamlined transactions where businesses (LNSP and MPB) are aligned. In most instances the MC will not have the Metering and Datastream information to provide this information as required. Incorrect updates by the MC may be Objected to, resulting in metering not being updated in MSATS. If industry determines this transaction will remain the contract updates MUST be removed from this transaction.			Refer to section 4.67
351.	Ausgrid	16.4	Metering Coordinator Obligations	See comments for 13.4 Ausgrid LNSP is against the mandatory population of Network Tariffs in CR30xx transactions. MPB's will not know the correct tariffs to apply. Incorrect population of Network Tariffs will result in rebilling effecting LNSP and FRMP processes.			Refer to section 4.89
352.	AGL	16.4	Metering Coordinator Obligations	Clause (g) If this is a prospective change for a meter, then a CR 1500 also needs to be raised and should be noted in this section.			AEMO does not agree with participant suggestion As CR1500 is not relevant in te context to this CR.
353.	Acumen	16.4	Metering Coordinator Obligations	Acumen does not agree with the change to Network Tariff Code as a mandatory field as this information may not always be available to the MPB and the MPB is not responsible for the data maintained in the field.			Refer to section 4.89
354.	Active Stream	16.4	Metering Coordinator Obligations	(g) 3080 is prospective. So, if MP and MDP can be nominated, why isn't a 1500 required?			AEMO does not agree with participant suggestion As CR1500 is not relevant in te context to this CR.
355.	United Energy	16.4	Metering Coordinator Obligations	Remove from Table (f) MDM Contributory suffix (and insert into table (e) MDM Contributory Suffix (For each register ID). The effect of this change is to make it mandatory to ensure that each unique suffix value (eg E1, B1, Q1, K1) for interval meters is properly recorded in MSATS,			AEMO does not agree with participant suggestion as this is an existing issue that is outside the scope of this consultation.
356.	ActewAGL	16.4	Metering Coordinator Obligations	This Section should be set as same as 16.4 and 17.4 as similar obligations apply and same mandatory fields			AEMO note this comment and will consider it in the second draft of the procedure

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				(e) move into the header description “for each register ID” then remove from table (it is done in (h))			
357.	Red Lumo	16.4	Metering Coordinator Obligations	Inconsistent application of acronym. All other roles are represented as an acronym e.g. 14.4 MPB Obligations, whereas this role has not, i.e. Metering Co-ordinator rather than MC.			Agreed
358.	Red Lumo	16.5	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
359.	United Energy	16.6	OBJECTION RULES	The LNSP and FRMP should also be allowed to object.			AEMO does not agree there is suitable reasons for the LNSP or the FRMP to object.
360.	Endeavour Energy	16.7	CHANGE REQUEST STATUS NOTIFICATION RULES	Procedural improvement: The LNSP needs to be notified of these Change Requests because it is initiated by the Current MC who may not be the LNSP.			Agreed
361.	Ausgrid	17.2	CONDITIONS PRECEDENT	See comments in 16.2			Refer to section 4.67
362.	AGL	17.4	Metering Coordinator Obligations	Clause (g) If this is a prospective change for a meter, then a CR 1500 also needs to be raised and should be noted in this section.			AEMO does not agree with participant suggestion As CR1500 is not relevant in te context to this CR.
363.	Acumen	17.4	Metering Coordinator Obligations	Acumen does not agree with the change to Network Tariff Code as a mandatory field as this information may not always be available to the MC and the MC is not responsible for the data maintained in the field.			Refer to section 4.89
364.	Active Stream	17.4	Metering Coordinator Obligations	(g) 3090 is prospective. So, if MP and MDP can be nominated, why isn't a 1500 required?			AEMO does not agree with participant suggestion As CR1500 is not relevant in te context to this CR.
365.	United Energy	17.4	Metering Coordinator Obligations	Remove from Table (h) MDM Contributory suffix (and insert into table (f) MDM Contributory Suffix (For each register ID). The effect of this change is to make it mandatory to ensure that each unique suffix value (eg E1, B1, Q1, K1) for interval meters is properly recorded in MSATS.			AEMO requires more information with regards to what the participant is requesting, and will contact the participants after publishing the draft determination to clarify
366.	Red Lumo	17.4	Metering Coordinator Obligations	Inconsistent application of acronym. All other roles are represented as an acronym e.g. 14.4 MPB Obligations, whereas this role has not, i.e. Metering Co-ordinator rather than MC.			AEMO agrees to the proposed change
367.	Red Lumo	17.5	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
368.	United Energy	17.6	OBJECTION RULES	The LNSP and FRMP should also be allowed to object.			AEMO does not believe there is suitable reasons for the LNSP or the FRMP to object.
369.	Endeavour Energy	17.7	CHANGE REQUEST STATUS NOTIFICATION RULES	Procedural improvement: The LNSP needs to be notified of these Change Requests because it is initiated by the Current MC who may not be the LNSP.			Agreed
370.	ActewAGL	18.4	LNSP Obligations	Change header to read: The Current LNSP must, for each Register ID:			Agreed
371.	Active Stream	19	MAINTAIN DATASTREAM – CREATE MDM	4000 – Change sentence to read “Datastream status to be changed to inactive...”			The current description of CR4000 is accurate

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
			DATASTREAM – SMALL OR LARGE				
372.	Ausgrid	19.1	APPLICATION [4000 4001 4003]	Delete 4003			Refer to section 4.67
373.	Origin	19.1	APPLICATION [4000 4001 4003]	4003 – Create MDM Datastream – Retrospective (Tier 1 only) This is where the Current MDP establishes the initial set of information in MSATS in regard to the MDM Datastream details for a connection point for a Tier 1 Site to apply from a Retrospective Day. # Remove 4003 as transaction not delivered to LR or FRMP			Refer to section 4.67
374.	Endeavour Energy	19.1	APPLICATION [4000 4001 4003]	Procedural improvement: We would suggest deleting CR 4003. See comments for section 4.2 above.			Refer to section 4.67
375.	Ausgrid	21.1	APPLICATION [4050 4051 4053]	Delete CR4053			Refer to section 4.67
376.	Endeavour Energy	21.1	APPLICATION [4050 4051 4053]	Procedural improvement: We would suggest deleting CR 4053. See comments for section 4.2 above.			Refer to section 4.67
377.	Active Stream	22	MAINTAIN NMI – UPDATE NEXT SCHEDULED READ DATE – SMALL OR LARGE	This should be after 23 and 24,			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback
378.	ActewAGL	22.1	APPLICATION [5070 5071]	Change sentence to read: 5070 – Update Next Scheduled Read Date This is where the Current MDP is required to provide MSATS with a Prospective Next Scheduled Read Date. 5071 – Update Next Scheduled Read Date – Retrospective This is where the Current MDP is required to provide MSATS with a Retrospective Next Scheduled Read Date.			The current description of CR4000 is accurate The current description of the CRs is accurate
379.	Origin	22.2	CONDITIONS PRECEDENT	(b) The NMI Classification Code is SMALL or, if the NMI Classification Code is LARGE, it only applies to non-remotely read sites, i.e. Tier 1 Sites .			Agreed.
380.	AGL	22.5	TIMEFRAME RULES	Review timeframe rules. Is this the period o raise a CR or the period the CR applies to ?			The timeframe is on the proposed change date and not on the NSRD, and normally CR5071 is used with a proposed change date of the day change request is submitted
381.	Active Stream	22.5	TIMEFRAME RULES	How can a retro NSRD be created? Is this in case something was missed? If so, then similar to below comment, limit should be 90/100 days. How can the prospective period only be 3 days? All other CRs, the prospective period dictates the latest the proposed date can be, which is the equivalent of the NSRD. Therefore, shouldn't this be 90 days or 100?			The timeframe is on the proposed change date and not on the NSRD, and normally CR5071 is used with a proposed change date of the day change request is submitted
382.	Ausgrid	22.7	CHANGE REQUEST STATUS NOTIFICATION RULES	CR507x must be sent to the current LNSP for the 'MRAM' (and any other non-regulated manually read meters if allowed under the Rules) Metering Installation Type. It is assumed that the market would want these sites Network Billed as per the NSRD. The LNSP therefore requires notification of the transaction. The LNSP does not require notifications for BASIC or MRIM Metering Installation Types. Also add LR to Notification – Resolves contention in MDFF.			AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
383.	SAPN	22.7	CHANGE REQUEST STATUS NOTIFICATION RULES	Table 22-B – the current LNSP should receive a notification at the completed stage.2-B – the current LNSP should receive a notification at the completed stage. Required for sites where the LNSP is not the MDP i.e. Type 4A sites.			AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF
384.	CitiPower & PowerCor	22.7	CHANGE REQUEST STATUS NOTIFICATION RULES	Table 22-B – the current LNSP should receive a notification at the completed stage.2-B – the current LNSP should receive a notification at the completed stage. Required for sites where the LNSP is not the MDP i.e. Type 4A sites.			AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF
385.	Origin	22.7	CHANGE REQUEST STATUS NOTIFICATION RULES	# CR5070/5071 Notification of changes should also be provided to Current LR			AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF
386.	Endeavour Energy	22.7	CHANGE REQUEST STATUS NOTIFICATION RULES	Procedural improvement: The LNSP needs to be notified of these Change Requests because it is initiated by the Current MDP who may not be the LNSP. However consistent with current practice, the notification should only be provided if the Change Request was initiated by a MDP that is not affiliated with the LNSP.			AEMO does not agree with this suggestion as the LNSP and LR can get this information from the MDFF
387.	AGL	23.4	LNSP OBLIGATIONS (5001 ONLY)	Review drafting – new LNSP = current LNSP			AEMO note this comment and will consider it in the 2nd draft of the procedure
388.	AGL	23.5	ENM OBLIGATIONS (5021 ONLY)	Review LR obligation. May be the ENM obligation now.	P139 - clause(b) NMI information LNSP for an embedded network is not the ENM – but the EN owner/ operator		There are no longer LR obligations for CR5021, it is ENM obligations as per the draft procedure ENM is the LNSP role in MSATS, the Embedded network operator is not listed against the NMI and it is not a registered participant
389.	Lendlease	23.5	ENM OBLIGATIONS (5021 ONLY)		Although section 2.11 states the ENM is to ensure the availability of the network tariff code, it is not mentioned in the available options here.		Refer to section 4.89
390.	Pacific Hydro	23.8	TIMEFRAME RULES	As per the comment in 6.5.			Refer to section 4.78
391.	AGL	23.8	TIMEFRAME RULES	P140 – Timeframe 1 b/day is not adequate			Refer to section 4.78
392.	Red Lumo	23.8	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
393.	Powershop	23.8	TIMEFRAME RULES	would prefer no change to current timing.			Refer to section 4.78
394.	Red Lumo	23.9	OBJECTION RULES	Recommendation for the reinstatement of the New RoLR to submit an objection. In the situation where a participant has been nominated in error the relevant objection can be submitted.			AEMO needs sufficient reasons and details for the participant request

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
395.	Active Stream	24	MAINTAIN NMI – CHANGE A NMI – SMALL OR LARGE	Suggest splitting CR in to NMI status updates and NMI general info updates, or at least some sort of identifier to stipulate that status is being changed.			AEMO notes this comment and will reformat the CR code sections based on the collective Participant feedback
396.	Ausgrid	24.1	APPLICATION [5050 5051 5053]	Delete CR5053			Refer to section 4.67
397.	Endeavour Energy	24.1	APPLICATION [5050 5051 5053]	Procedural improvement: We would suggest deleting CR 5053. See comments for section 4.2 above.			Refer to section 4.67
398.	United Energy	24.4	LNSP Obligations	The FRMP and MC obligations seem to be missing.			There are no relevant FRMP and MC obligations relevant to this CR as it is initiated and submitted by the LNSP
399.	Pacific Hydro	24.5	TIMEFRAME RULES	The current MDP can object according to Table 24.6 but in Table 24.5, there are zero days to lodge the objection.			AEMO will make the necessary changes to fix this inconsistency
400.	Red Lumo	24.6	OBJECTION RULES	Objection code: BADMETER has been removed from Table 4-D – Objection Codes; however it remains in this table.			BADMETER will be re-instated, Refer to section 4.78
401.	SAPN	24.6	OBJECTION RULES	Table 24-B – “BADMETER” objection should be removed from the table. Is there is 0(zero) days for the MDP to object, is it possible for them to object with “NOTRESP”?			BADMETER will be re-instated, Refer to section 4.78 The MDP can object but it has to be done on the day the CR is raised
402.	CitiPower & PowerCor	24.6	OBJECTION RULES	Table 24-B – “BADMETER” objection should be removed from the table. Is there is 0(zero) days for the MDP to object, is it possible for them to object with “NOTRESP”?			BADMETER will be re-instated, Refer to section 4.78 AEMO clarifies that the MDP can object but it has to be done on the day the CR is raised
403.	Endeavour Energy	24.6	OBJECTION RULES	Procedural improvement: Table 24-B shows that the Current MDP can object for BADMETER & NOTRESP for a Change Request to update NMI standing data. These objection reasons are not valid and would suggest that they be removed.			BADMETER will be re-instated, Refer to section 4.78. AEMO clarifies that the MDP can object using the NOTRESP objection code but it has to be done on the day the CR is raised
404.	AusNet Services	24.6	OBJECTION RULES	The table 24A shows 0 objection logging days but the Objection Rules table allows some objections. AusNet Services believe there should not be any objections on these change requests			AEMO clarifies that the MDP can object but it has to be done on the day the CR is raised
405.	Active Stream	26.4	ENM Obligations	Replace the current LR with the current ENM may:			Agreed
406.	Lendlease	26.4	ENM Obligations		Although section 2.11 states the ENM is to ensure the availability of the network tariff code, it is not mentioned in the available options here.		Refer to section 4.89
407.	AGL	26.4	ENM Obligations	The current ENM may... not LR			Agreed
408.	AusNet Services	26.4	ENM Obligations		Incorrect statement Should state: The Current LR ENM may		Agreed
409.	Pacific Hydro	26.5	TIMEFRAME RULES	** The ACT and Tasmanian regulators have not approved the use of embedded networks in their respective Jurisdictions. QLD			AEMO confirms that this has been deleted as it is an incorrect statement

POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				<p>jurisdiction has not approved embedded networks for “SMALL” consumers and has determined that there will be no new embedded networks for “LARGE” consumers. Why has this been deleted? Is this no longer correct. If it is correct suggest it is moved to section 4.18</p>			
410.	Endeavour Energy	27	MAINTAIN NMI – CHANGE PARENT NAME – SMALL OR LARGE		<p>Procedural improvement: Only one party should be allowed to update the Embedded Network Code on the Parent NMI. We would suggest that this be the LNSP, therefore clause 27 should be updated accordingly</p>		Agreed
411.	Endeavour Energy	28	MAINTAIN NMI – MAKE NMI A CHILD NMI – SMALL OR LARGE		<p>Procedural improvement: Allowing a market NMI become a Child NMI would cause significant system and procedural issues because they have been designed to comply with clause 11.3 of National Metering Identifier Procedure which states (bold text added for emphasis): ‘A NMI cannot be reassigned to another connection point. It is NOT acceptable to reallocate NMIs to accommodate changes to IT systems, changes to assumed associations, changes to network tariffs and charges, changes to LNSP boundaries or because the LNSPs allocation system has changed. While a customer may change their elected FRMP, the NMI for a connection point remains constant throughout its market life. If a connection point is abolished the NMI becomes extinct, and hence each NMI has a start date as well as an end date and associated change control. Where a customer changes the physical location of the connection point a new NMI must be allocated. The “old” NMI is decommissioned on AEMO’s Metering Register and the “new” NMI commissioned accordingly.’ For an existing market NMI to change to a Child NMI the physical location of the connection point must be</p>		Refer to section 4.3

POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
					<p>changed. Therefore extinction of the market NMI and creation of a new Child NMI is the current obligation and business practice.</p> <p>AEMO suggested that a NMI was to be made extinct then retrospectivity in MSATS would be disabled, however this is incorrect because it is still possible to make changes in MSATS for the period that the NMI is still active.</p> <p>AEMO also stated that ‘... it was confirmed that all retailers, MDPs and MPs would have to accommodate complex and costly processes should a NMI need to be made extinct and a new NMI created’. However AEMO’s proposal would also introduce complexity and cost for LNSPs, MDPs and MPs too.</p> <p>We would suggest that when market NMI become a Child NMI the LNSP extinct the market NMI and the ENM create a new Child NMI if required.</p>		
412.	AGL	28.3	INITIATION RULES		<p>P151 Why would AEMO initiate a change request for a child NMI ? Especially as AEMO has been stricken out from the descriptive section of the applications.</p>		Refer to section 4.67
413.	Ausgrid	28.4	ENM Obligations	<p>If the NMI Status of N remains the Section is not consistent. Upon addition of the Embedded Network Name to the Child NMI the NMI Status must update dependent on the FRMP relationship to the Parent NMI.</p> <p>Note: Ausgrid maintains you shouldn’t be able to move a NMI from a ‘real’ network to an embedded network. The ‘real’ network NMI needs to be made extinct and a new embedded network child created. “Once a child, always a child – Never a child, never a child”. Suggest to delete CR5090/5091.</p>			Refer to sections 4.67 and 4.3
414.	Ausgrid	29.1	APPLICATION [6100 6110]	Add “ENM” to initiating party.			Agreed.
415.	AGL	29.5	TIMEFRAME RULES	P154 – timeframe 1 b/day is inadequate			Refer to section 4.78
416.	Transgrid	29.5	TIMEFRAME RULES	TransGrid would prefer the Objection Logging Period for large NMI’s to remain at 5 days. TransGrid does not have automated			Refer to section 4.78

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
				B2B software that flags objections, all CATS generated xml files are manually read. One day to respond is considered too short.			
417.	Red Lumo	29.5	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
418.	Powershop	29.5	TIMEFRAME RULES	would prefer no change to current timing.			Refer to section 4.78
419.	AGL	30	CHANGE ROLE – CHANGE MDP – SMALL OR LARGE	P155 Obligations Why is the current FRMP party to the obligation to change an MDP ? This is an MC responsibility MDP obligations have been removed. Who is responsible for razing the CR 1500 ? Should note where the CR 1500 is required – see 3.6.			Refer to section 4.67
420.	Active Stream	30	CHANGE ROLE – CHANGE MDP – SMALL OR LARGE	Are we getting rid of 62xx and 67xx? Not required since LNSP as MC will be given access to 68xx Why have MDP obligations been removed? How about 1500 on 6200? 36.6(a) should apply here. See 6.3(a)			Refer to section 4.67 AEMO considers that CR1500 is irrelevant in the context of CR6000 series
421.	Ausgrid	30.1	APPLICATION [6200 6210]	CR6200 must be updated to complete on an Actual Change Date (CR1500) supplied by the MDP. The CR6200 has similar functionality to the CR6800. Changes in MDP must validated before the transfer can complete. Example BASIC to COMMS must align to a Meter Exchange Date.			Refer to section 4.67
422.	AGL	30.1	APPLICATION [6200 6210]	Are these CR's remaining or can they be replaced by the CR 6800.			Refer to section 4.68
423.	Ausgrid	30.3	INITIATION RULES	The FRMP should not be allowed to initiate the MDP. Only the current MC can nominate the MDP. Delete in lieu of CR6800/CR6801?			Refer to section 4.67
424.	Red Lumo	30.5	METERING COORDINATOR OBLIGATIONS	Inconsistent application of acronym. All other roles are represented as an acronym e.g. 30.4 FRMP Obligations, whereas this role has not, i.e. Metering Co-ordinator rather than MC.			Agreed.
425.	Pacific Hydro	30.6	TIMEFRAME RULES	As per the comment in 6.5.			Refer to section 4.78
426.	Transgrid	30.6	TIMEFRAME RULES	TransGrid would prefer the Objection Logging Period for large NMI's to remain at 5 days. TransGrid does not have automated B2B software that flags objections, all CATS generated xml files are manually read. One day to respond is considered too short.			Refer to section 4.78
427.	AGL	30.6	TIMEFRAME RULES	P156 – Timeframe 1 b/day is inadequate			Refer to section 4.78
428.	Red Lumo	30.6	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
429.	Powershop	30.6	TIMEFRAME RULES	would prefer to keep objection logging at 5 business days.			Refer to section 4.78
430.	ActewAGL	30.7	OBJECTION RULES	Sentence is incomplete and thus has no meaning as it needs to refer to Table 30-B			Agreed.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
431.	Endeavour Energy	31	CHANGE ROLE – CHANGE METERING COORDINATOR – SMALL OR LARGE	Procedural improvement: Only a FRMP should be allowed to nominate a MC in MSATS which is consistent with the NER intent. We would suggest that only a FRMP can initiate Change Request 6300 and 6301.			Refer to section 4.67
432.	Red Lumo	31	CHANGE ROLE – CHANGE METERING COORDINATOR – SMALL OR LARGE	Inconsistent application of acronym. All other roles are represented as an acronym e.g. 30 CHANGE ROLE – CHANGE MDP – SMALL OR LARGE, whereas this role has not, i.e. Metering Co-ordinator rather than MC.			Agreed.
433.	AGL	31.1	APPLICATION [6300 6301]	Delete 'either by a regulatory change or due to an error in the NMI Master Record' – cause isn't relevant.			Agreed.
434.	Active Stream	31.1	APPLICATION [6300 6301]	Remove sentence "(either by regulatory...NMI master record)", it is not relevant			Agreed.
435.	Ausgrid	31.3	INITIATION RULES	The FRMP should be allowed to change the MC using a CR63xx transaction. The MC should only be allowed to update the MC where the NMI Classification is LARGE.			Refer to section 4.67
436.	Red Lumo	31.4	METERING COORDINATOR Obligations	Inconsistent application of acronym. All other roles are represented as an acronym e.g. 30.4 FRMP Obligations, whereas this role has not, i.e. Metering Co-ordinator rather than MC.			Agreed.
437.	Pacific Hydro	31.5	TIMEFRAME RULES	As per the comment in 6.5.			Refer to section 4.78
438.	AGL	31.5	TIMEFRAME RULES	P158 – Timeframe 1 b/day is inadequate			Refer to section 4.78
439.	Red Lumo	31.5	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
440.	Powershop	31.5	TIMEFRAME RULES	would prefer no change to current timing.			Refer to section 4.78
441.	Red Lumo	32.1	APPLICATION [6300 6301]	Section 32.1 relates to Application [6400 6401] not [6300 6301]			The reference to the section seems to be correct in the document, section 32.1 is correctly referring to Application [6400 6401].
442.	AGL	32.5	TIMEFRAME RULES	P161 – Timeframe 1 b/day is inadequate			Refer to section 4.78
443.	Red Lumo	32.5	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
444.	Powershop	32.5	TIMEFRAME RULES	would prefer no change to current timing.			Refer to section 4.78
445.	Ausgrid	33	CHANGE ROLE – CHANGE LR - EMBEDDED NETWORK (CHILD) – SMALL OR LARGE	An MSATS procedure should be established to automatically change the LR on all Child NMIs where the FRMP changes on the Parent NMI.			AEMO notes that there is already an existing MSATS Auto Change role [ECLR] which performs what the participant has requested.
446.	Endeavour Energy	33.1	APPLICATION [6421]		Procedural improvement: Only an ENM should be allowed to nominate a LR in MSATS for a Child NMI. We would suggest		Refer to section 4.67

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
					that only the Current ENM can initiate Change Request 6421.		
447.	AusNet Services	33.1	APPLICATION [6421]		AusNet Services believe this CR could also be used by the ENM to ensure the standing data in MSATS is correct. This will allow both parties to update this information.		Refer to section 4.67
448.	Pacific Hydro	33.5	TIMEFRAME RULES	As per the comment in 6.5.			Refer to section 4.78
449.	AGL	33.5	TIMEFRAME RULES	P163 – Timeframe 1 b/day is inadequate			Refer to section 4.78
450.	Red Lumo	33.5	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
451.	Powershop	33.5	TIMEFRAME RULES	would prefer no change to current timing.			Refer to section 4.78
452.	Pacific Hydro	34.5	TIMEFRAME RULES	If there are no objections allowed for these change requests, as per 34.6, remove the objection logging periods from Table 34-A			AEMO will address the inconsistency.
453.	AGL	34.5	TIMEFRAME RULES	P166 – timeframes Why are there objection timeframes if objections are not permitted ?			AEMO will address the inconsistency.
454.	Red Lumo	34.5	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
455.	Powershop	34.5	TIMEFRAME RULES	would prefer no change to current timing.			Refer to section 4.78
456.	AusNet Services	34.6	OBJECTION RULES	Statement says no objection rules permitted but the table 34A allows objection logging periods.			AEMO will address the inconsistency.
457.	AusNet Services	34.7	CHANGE REQUEST STATUS NOTIFICATION RULES	Are the rules in the notification tables going to change for this? Some participants may have built their systems to accept these as a RoLR particularly in VIC where we have not adopted NECF. As the new and current wouldn't you want to know the status.			Agreed, Notifications to ROLR have been re-instated
458.	Ausgrid	35	CHANGE ROLE – CHANGE MPB OR MPC– SMALL OR LARGE	Delete in lieu of CR6800/CR6801?			Refer to section 4.67
459.	AGL	35	CHANGE ROLE – CHANGE MPB OR MPC– SMALL OR LARGE	Include 'and' in header IS this CR to be retired ?			AEMO agrees to this comment and will make the necessary changes in the second draft of the procedure The CR will not be disabled to allow the change of LR on NMs
460.	Active Stream	35	CHANGE ROLE – CHANGE MPB OR MPC– SMALL OR LARGE	Are we removing this CR? Please clarify why “and/or” has been changed to “or” only. You can raise them both or individually, therefore and/or applies			This CR is not being removed AEMO considers that ‘and/or’ is ambiguous and not to be used. AEMO will replace and/or with MPB or MPC or Both
461.	Pacific Hydro	35.1	APPLICATION [6700 6701]	It should read MPB ‘and/or’ MPC as one or both roles can be updated.			AEMO considers that ‘and/or’ is ambiguous and not to be used. AEMO will replace and/or with MPB or MPC or Both

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
462.	Pacific Hydro	35.3	INITIATION RULES	A Current RP MC may initiate a Change Request to change an Metering Provider MP-MPB or MPC in the MSATS system in accordance with clause section 35.4 35.438.4 .			Agreed
463.	Red Lumo	35.4	METERING COORDINATOR Obligations	Inconsistent application of acronym. All other roles are represented as an acronym e.g. 30.4 FRMP Obligations, whereas this role has not, i.e. Metering Co-ordinator rather than MC.			Agreed.
464.	Pacific Hydro	35.5	TIMEFRAME RULES	As per the comment in 6.5.			Refer to section 4.78
465.	AGL	35.5	TIMEFRAME RULES	P167 – Timeframe 1 b/day is inadequate			Refer to section 4.78
466.	Red Lumo	35.5	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
467.	Powershop	35.5	TIMEFRAME RULES	would prefer no change to current timing.			Refer to section 4.78
468.	AGL	36.1	APPLICATION [6800 6801]	Is this for more than one role or one or more roles ?			AEMO clarifies that the CR is for one or more roles
469.	Active Stream	36.1	APPLICATION [6800 6801]	Should say one or more roles, not more than 1 role.			Agreed
470.	Ausgrid	36.3	INITIATION RULES	The FRMP should not be allowed to raise a CR68xx as they are not entitled to update the Service Provider Roles.			Refer to section 4.67
471.	Pacific Hydro	36.3	INITIATION RULES	(a) A Current FRMP may initiate a Change Request to change any or all of the... (b) A Current MC may initiate a Change Request to change any or all of the...			Agreed.
472.	AGL	36.3	INITIATION RULES	P169 – Initiation A new MC should be able to update the MC role as well as the MP, MDP roles same as the FRMP			Refer to section 4.67
473.	Active Stream	36.3	INITIATION RULES	A new MC can also initiate a CR to make themselves MC and change the MP/MDP			Refer to section 4.67
474.	Ausgrid	36.4	FRMP OBLIGATIONS	The MC should not be nominated in this transaction if the FRMP cannot initiate.			Refer to section 4.67
475.	Red Lumo	36.4	FRMP OBLIGATIONS	The FRMP must: (d) Populate a Change Request with one or more of the following: MC The role throughout this procedure has remained as RP with participants recognising RP = MC. Confirmation required as to whether the role of RP will be changed to MC.			The RP MSATS role id will be used in MSATS to denote the Metering Coordinator (MC)
476.	Red Lumo	36.5	METERING COORDINATOR Obligations	Inconsistent application of acronym. All other roles are represented as an acronym e.g. 36.4 FRMP Obligations, whereas this role has not, i.e. Metering Co-ordinator rather than MC.			Agreed.
477.	AGL	36.6	MDP OBLIGATIONS	Cl(a) Misleading – data request delivered when CR goes to PEND cl(d) – incorrect - remove			Pending status is irrelevant in this CR Agreed

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
478.	Active Stream	36.6	MDP OBLIGATIONS	(a) Sentence is misleading. If the meter has not been installed then the 1500 cannot be initiated. (d) retro changes don't require a 1500, remove paragraph			See comment above
479.	Pacific Hydro	36.7	TIMEFRAME RULES	As per the comment in 6.5.			Refer to section 4.78
480.	Transgrid	36.7	TIMEFRAME RULES	TransGrid would prefer the Objection Logging Period for large NMI's to remain at 5 days. TransGrid does not have automated B2B software that flags objections, all CATS generated xml files are manually read. One day to respond is considered too short.			Refer to section 4.78
481.	AGL	36.7	TIMEFRAME RULES	1 b/day is inadequate			Refer to section 4.78
482.	Red Lumo	36.7	TIMEFRAME RULES	Reducing the number of days for a participant to log an objection from 5 to 1 is an insufficient timeframe for investigation. The proposed change is not supported and should remain at 5 business days.			Refer to section 4.78
483.	Powershop	36.7	TIMEFRAME RULES	would prefer no change to current timing.			Refer to section 4.78
484.	AGL	36.8	OBJECTION RULES	P170 – Objection Rules The MC (RP) role should be able to object using Declined			Agreed
485.	Active Stream	36.8	OBJECTION RULES	The MC should be able to object using Declined			Agreed
486.	Pacific Hydro	38.1	APPLICATION [EPFR]	This procedure is an automatic process triggered by MSATS whenever the FRMP for is changed for for a Parent NMI is chnaged .			Agreed.
487.	ActewAGL	39.4	AEMO Obligations	(e) Remove the words “that are retrospective” as it is not required.			Agreed.
488.	AGL	40.1	INTRODUCTION	P177 The bulk change tool will also need to be able to bulk change MCs which fail or which sell their businesses			This currently exists as the RP can be changes using the BCT
489.	AGL	40.2	CONDITIONS PRECEDENT	P178 Conditions precedent will need updating for MC failure or purchase BCT updates should be capable of prospective dates			This currently exists as the RP can be changes using the BCT
490.	Red Lumo	41.2	PARTICIPANT	(c) A Participant may seek access to <i>NMI Standing Data</i> from MSATS in accordance with section 44.6 only for the purpose of: Confirmation that the correct section has been referenced in the above.			It should read section 41.643 of the procedure.
491.	AGL	40.3	REQUESTING PARTICIPANT OBLIGATIONS	P179 – clause (g) Need to include MC in the table			The table already includes the RP role id which is used for the MC in MSATS.
492.	Pacific Hydro	41.2	PARTICIPANT	...MSATS in accordance with... Change to 'as set out in' Change ...'NMI characters'... to 'NMI attributes'.			Agreed
493.	AGL	41.2	PARTICIPANT	P180 – clause (c) The reasons for seeking NMI standing data need to include those associated with MC/MP/MDP Eg identification of an MC for meter failure			It is not possible to use NMI discovery, new parties can use C7 report, and current parties will have access to NMI standing data as per 41.543.3.3 of the procedure.
494.	AGL	41.3	NMI DISCOVERY SEARCH 1 – NMI SEARCH RULES	P182 – clause (j) Need to include MC/MP/MDP in search response			AEMO needs more participants support for this request to be able to consider it, as it might require Participant system changes.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
495.	AGL			P183 – clause (n) Need to include MC/MP/MDP in search response			clause n is for roles that can access NMI Discovery Search 1 and not for the search response
496.	AGL	41.4	NMI DISCOVERY SEARCH 2 – NMI STANDING DATA ACCESS RULES	Pp183/184 Table 41C Need to include MC in search results			AEMO does not agree as adding MC is not relevant
497.	ActewAGL	41.4	NMI DISCOVERY SEARCH 2 – NMI STANDING DATA ACCESS RULES	Table 41-C heading reword to: Common NMI Standing Data Search 2 items returned to a FRMP or LNSP			Agreed
498.	AusNet Services	41.4	NMI DISCOVERY SEARCH 2 – NMI STANDING DATA ACCESS RULES		Corrections and additions to 41C table Parent Name A code representing the name of an ENM a parent connection point. LNSP A code representing the identity of the LNSP or Embedded Network Manager for a child connection point		The definition will be updated
499.	AusNet Services	41.5	CATS STANDING DATA ACCESS RULES		Addition to 41G table LNSP Current Local Network Service Provider or Embedded Network Manager for a child connection point		Agreed
500.	Pacific Hydro	Old 43.3	AEMO Obligations	Why have these AEMO obligations been removed from the section?			They are redundant, and covered in the ROLR process.

Table 7 – MSATS Procedures: WIGS

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
1.	Ausgrid	1	Introduction	In general, updates between CATS and WIGS documents are not consistent and need to be reviewed. Example:- 2.4.1 WIGS does not allow the FRMP to update the MDP in the CR1000 / CR1020, this is now correct. 6.2.(i) CATS allows the update of the MDP for a CR1000 / 1020 Ausgrid require the alignment of procedures for review. See CATS comments relevant to the WIGS documentation.			AEMO notes the comment and will ensure that both CATS and WIGS are consistent with any changes made as a result of this consultation and associated feedback.
2.	Endeavour Energy	1	Introduction	The feedback provided for the CATS Procedure would also apply to the equivalent sections and clauses in the WIGS Procedure			Noted.
3.	Origin Energy	1	Introduction	# Still includes references to RP throughout the document			Agreed, the required updates will be made.
4.	Origin Energy	1	Introduction	# Still includes references to RP throughout the document			Agreed, the required updates will be made.
5.	Red Lumo	1.2	Definitions and Interpretation	Recommendation for inclusion of the following for any words/terms that are italicised: Italicised words and phrases which are defined in the National Electricity Rules have the same meaning within this Procedure.			The Glossary and Framework confirms that italicised terms used in Procedures have the same meanings given to those terms in the NER and clause 1.2 of MSATS already says that the Glossary and Framework is incorporated into the MSATS procedures and should be read with the MSATS procedures.
6.	Vector AMS	1.2	Definitions and Interpretation	Remove manual line break in first two lines.			Agreed.
7.	AusNet Services	1.10 & 1.11 (Old)	Jurisdictions and NMI Classification Codes	AusNet Services believe these sections should remain as some participants who use WIGS have no need to refer to the CATS procedures. These should be left in for ease of use, instead of having to go to another document to obtain this information.			No change required. Note that the explanation of other MSATS codes (e.g. Objection Codes, Role Codes etc.) are not in the WIGS, so it is reasonable to expect that a participant at present already needs to refer to the CATS Procedure.
8.	Red Lumo	2.1.	Application [1000 1020]	Is this possible for a WIGS NMI?			Yes
9.	AGL	2.4.	Obligations	P24 – S2.4.2 <ul style="list-style-type: none"> CI (a) Is it still appropriate to make the ADL an LNSP obligation in the new arrangements ? CI (b) is it still appropriate to make the LNSP responsible for energisation ? 			LNSP obligations have been deleted from this section to be consistent with MSATS CATS as it is irrelevant under this CR. The LNSP will still have the obligation to provide MDP with ADL at the time of NMI creation, and they are responsible for the Physical re-energisation and de-energisation of the NMI.
10.	AusNet Services	2.4.	Obligations	2.4.2 This information was removed in the CATS version. Please remove this or add to CATS for consistency 2.4.4 We do not believe this clause is relevant for this section. This is about the transfer of a FRMP not changes to other roles. We suggest it should be worded to the effect of: The new MC must:			Agreed

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

				ensure MDP, MPC and MPB roles are correct and if not raise appropriate Change Request to update. Refer to section 21 to 27 for Change Request types for Role Changes. The new MC may is covered in the must section. 2.4.5 This information was removed in the CATS version. Please remove this or add to CATS for consistency 2.5.2 may is covered in the must section.			
11.	Origin Energy	2.4.	Obligations	2.4.4 Current RP MC			Agreed.
12.	Red Lumo	2.4.	Obligations	Inconsistency with terms and inclusions <ul style="list-style-type: none"> • Network Tariff Code (for each register ID) • Network Tariff Code Inconsistent wording between clauses my lead to incorrect data updates. The network tariff is held on a meter register in the MSATS model and all registers belonging to a meter should be updated in case of change.			Agreed, will be updated to Network Tariff Code (for each register)
13.	Transgrid	2.4.	Obligations	TransGrid would prefer the period for provision of data in 2.4.2 (c) to be 5 days. TransGrid does not have automated B2B software that flags objections, all CATS generated xml files are manually read. One day to respond is considered too short.			LNSP obligations will be deleted from this section as it is irrelevant and to be consistent with MSATS CATS
14.	United Energy	2.4.	Obligations	2.4.4 need to replace current RP with current MC			Agreed
15.	Energex	2.7.	Objection Rules	It is not clear to Energex why the “badmeter” objection code has been removed. Further information is required as to the reason for its removal.			Refer to section 4.7 8
16.	Ergon Energy	2.7.	Objection Rules	The “badmeter” objection code has been removed. Further information is required as to the reason for its removal, as it is not clear why this has occurred.			Refer to section 4.7 8
17.	Red Lumo	3	Change FRMP – Embedded Networks – generator and wholesale		Why has this been included?		CR1080 & 1082 have been added to WIGS to enable on-market/off-market transfer of child WIGS NMIs.
18.	AGL	3.4.	FRMP Obligations	P36 – clause (f) There is no RP only MC			Agreed
19.	AusNet Services	3.4.	FRMP Obligations	Keep it consistent with CATS and just have ParticipantID			Noted and aligned with CATS changes.
20.	Origin Energy	3.4.	FRMP Obligations	(f) New RP MC			Agreed.
21.	AGL	3.5.	ENM(LNSP) Obligations		[EN] P37 –ENM Obligation An ADL may only be available in some circumstances		ENM Obligations will be deleted as it is irrelevant in this section, and for consistency with CATS
22.	AusNet Services	3.5.	ENM(LNSP) Obligations	Correction: The Current ENLR ENM may:			ENM Obligations will be deleted as it is irrelevant in this section, and for consistency with CATS
23.	AGL	3.7.	RP(MC) Obligations	P37 – cl(a) Change RP to MC			Agreed

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

24.	AusNet Services	3.7.	RP(MC) Obligations	3.7 We do not believe this clause is relevant for this section. This is about the transfer of a FRMP not changes to other roles. We suggest it should be worded to the effect of: The new MC must: ensure MDP, MPC and MPB roles are correct and if not raise appropriate Change Request to update. Refer to section 21 to 27 for Change Request types for Role Changes. The new MC may is covered in the must section.			Agreed
25.	Origin Energy	3.7.	RP(MC) Obligations	(a) Current- RP MC			Agreed
26.	Red Lumo	3.7.	RP(MC) Obligations	The new MC must: (a) Change the name of the Current RP using Change Reason Code 6300 if this change has not been performed by the new FRMP Reference to RP should this be MC?			Agreed
27.	AusNet Services	3.9.	Objection Rules		[EN] AusNet Services believe the LNSP (N) should have an ability to object to the change request in the case of being allocated incorrectly. Eg the ENM selects the incorrect LNSP participant id.		This is a Change FRMP change request, and the LNSP/ENM does not get nominated or allocated in this Change request, hence their objection is irrelevant in this CR
28.	Red Lumo	4.3.	Initiation Rules	This statement as written refers to the statement, i.e. it does not make sense as it is clause 4.3. The MDP may initiate a Change Request to submit an Actual Change Date to MSATS in accordance with section 4.3.			Agreed, reference updated
29.	AGL	5.4.	LNSP Obligations	P44- S5.4 cl(c) LNSP cannot populate a NMI creation with RP(MC), MDP, MPB, MPC roles unless they have previously been provided by the FRMP (or customer) and they may not have been established at that time			Refer to section 4.67
30.	AGL	5.5.	MPB Obligations	P45- S5.5 Process incorrect MPB cannot populate MSATS until they have been appointed by the MC, and therefore the trigger is not the completed status			LNSP will provide the role of the MPB at NMI creation, once the NMI creation CR is completed then MPB can provide Metering Installation details through the CR3000 series. LNSP will be creating NMIs with all roles. Refer to section 4.67
31.	AGL	6.4.	ENM Obligations	P48- S6.4 cl(c) ENM cannot populate a NMI creation with RP(MC), MDP, MPB, MPC roles unless they have previously been provided by the FRMP (or customer) and they may not have been established at that time			Refer to section 4.67
32.	AGL	6.5.	MPB Obligations	P49- S6.5 Process incorrect MPB cannot populate MSATS until they have been appointed by the MC, and therefore the trigger is not the completed status			The ENM through the MSATS role id of LNSP will provide the role of the MPB at NMI creation, once the NMI creation CR is completed then MPB can provide Metering Installation details through the CR3000 series. ENM/LNSP will be creating NMIs with all roles. Refer to section 4.67
33.	Powershop	6.6	Timeframe Rules	should be consistent with other timing requirements.			AEMO needs more details as to what the participant is requesting
34.	AGL	7.4.	LNSP Obligations	P52- S7.4 cl(c) LNSP cannot populate a NMI creation with RP(MC), MDP, MPB, MPC roles unless they have previously been provided by the FRMP (or customer) and they may not have been established at that time			Refer to section 4.67

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

35.	Red Lumo	7.4.	LNSP Obligations	Document has 2 versions: <ul style="list-style-type: none"> • Network Tariff Code (for each register ID) • Network Tariff Code Inconsistent wording between clauses may lead to incorrect data updates. The network tariff is held on a meter register in the MSATS model and all registers belonging to a meter should be updated in case of change.			See comment for section 2.4 of this procedure.
36.	AusNet Services	8.5.	Timeframe Rules	Timeframe rules state there is 1 day objection logging period. Objections rules state no objections permitted. AusNet Services believe there should be no objections.			Agreed
37.	Acumen	9.4.	MPB Obligations	Acumen does not agree with the change to Network Tariff Code as a mandatory field as this information may not always be available to the MPB and the MPB is not responsible for the data maintained in the field.			Refer to section 4.89
38.	AusNet Services	9.4.	MPB Obligations	AusNet Services do not agree with the making of this field mandatory for the MPB. The MPB does not have the understanding of Network tariffs that the LNSP does and cannot be held responsible for a Network tariff. There isn't any obligations on the LNSP to provide the Network tariff to the MPB. AusNet Services believe that updating of information should sit with the participant that has the obligation. We also believe that the Network tariff should sit at NMI level and not metering level.			Refer to section 4.89
39.	Red Lumo	9.4.	MPB Obligations	Document has 2 versions: <ul style="list-style-type: none"> • Network Tariff Code (for each register ID) • Network Tariff Code Inconsistent wording between clauses may lead to incorrect data updates. The network tariff is held on a meter register in the MSATS model and all registers belonging to a meter should be updated in case of change.			See comment for section 2.4 of this procedure.
40.	Acumen	10.4.	MPB obligations	Acumen does not agree with the change to Network Tariff Code as a mandatory field as this information may not always be available to the MPB and the MPB is not responsible for the data maintained in the field.			Refer to section 4.89
41.	AusNet Services	10.4.	MPB obligations	AusNet Services do not agree with the making of this field mandatory for the MPB. The MPB does not have the understanding of Network tariffs that the LNSP does and cannot be held responsible for a Network tariff. There isn't any obligations on the LNSP to provide the Network tariff to the MPB. AusNet Services believe that updating of information should sit with the participant that has the obligation. We also believe that the Network tariff should sit at NMI level and not metering level.			Refer to section 4.89
42.	Red Lumo	10.4.	MPB obligations	Document has 2 versions: <ul style="list-style-type: none"> • Network Tariff Code (for each register ID) • Network Tariff Code Inconsistent wording between clauses may lead to incorrect data updates. The network tariff is held on a meter register in the MSATS model and all registers belonging to a meter should be updated in case of change.			See comment for section 2.4 of this procedure.
43.	Acumen	11.4.	MPB Obligations	Acumen does not agree with the change to Network Tariff Code as a mandatory field as this information may not always be available to the MPB and the MPB is not responsible for the data maintained in the field.			Refer to section 4.89

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

44.	AusNet Services	11.4.	MPB Obligations	AusNet Services do not agree with the making of this field mandatory for the MPB. The MPB does not have the understanding of Network tariffs that the LNSP does and cannot be held responsible for a Network tariff. There isn't any obligations on the LNSP to provide the Network tariff to the MPB. AusNet Services believe that updating of information should sit with the participant that has the obligation. We also believe that the Network tariff should sit at NMI level and not metering level.			Refer to section 4.89
45.	Red Lumo	11.4.	MPB Obligations	Document has 2 versions: <ul style="list-style-type: none"> • Network Tariff Code (for each register ID) • Network Tariff Code Inconsistent wording between clauses may lead to incorrect data updates. The network tariff is held on a meter register in the MSATS model and all registers belonging to a meter should be updated in case of change.			See comment for section 2.4 of this procedure.
46.	Red Lumo	12.4.	LNSP Obligations	Document has 2 versions: <ul style="list-style-type: none"> • Network Tariff Code (for each register ID) • Network Tariff Code Inconsistent wording between clauses may lead to incorrect data updates. The network tariff is held on a meter register in the MSATS model and all registers belonging to a meter should be updated in case of change.			See comment for section 2.4 of this procedure.
47.	AGL	16.4.	LNSP Obligations	P86 – S16.4 cl(c) LNSP cannot populate a NMI creation with RP(MC), MDP, MPB, MPC roles unless they have previously been provided by the FRMP (or customer) and they may not have been established at that time			See comment for section 5.4 of this procedure.
48.	AGL	16.7.	MPB Obligations	P88 Process doesn't work MPB cannot take action on until MC appointed and then appoints MPB			See comment for section 5.5 of this procedure.
49.	AusNet Services	17.6.	Objection Rules	Timeframe rules state 0 days for objection logging period but the objection rules show who and what objections can be made. AusNet Services believe no objections should be on this CR			No change required. Where the MSATS Procedures state there are 0 days for the objection logging period, but objections are listed in the objection rules, it means that the relevant participant (if the objection is valid), can only object on the day the CR was raised. MSATS will send the REQ notification shortly after receiving the initial CR once it has passed any validation required.
50.	Vector AMS	18.5.	Timeframe Rules	Cross referencing error message for Table 18-A.			Noted
51.	Vector AMS	18.7.	Change Request Status Notification Rules	Cross referencing error message for Table 18-B.			Noted
52.	AGL	20.4.	LNSP Obligations		[EN] P97 – S20.4 cl(e)		Embedded Network Operator (ENO) is the Exempt Network Service Provider, which is not a registered

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

					Isn't the LNSP for the embedded network the EN operator not the ENM		participant. As per the Information Paper, the ENM will be maintained in the LNSP Role in MSATS for child NMIs.
53.	AGL	22	Change Role – Change MDP	P103 – S22.1 Application The obligation to change MDP is not one that exists with the FRMP (or large customer). It exists with the MC. The FRMP (or large customer) may choose to make the change.			Refer to section 4.67
54.	AGL	22.3.	Initiation Rules	P103 – S22.3 Initiation The obligation to change MDP is not one that exists with the FRMP (or large customer). It exists with the MC. The FRMP (or large customer) may choose to make the change.			See comment to section 22 of this procedure.
55.	AGL	22.4.	FRMP Obligations	P103 FRMP cannot have obligations in this scenario			See comment to section 22 of this procedure.
56.	AGL	23.1.	Application [6300 6301]	P107 – S23.1 Application MC is making a change to the MC role – change phrase Current RP to Current MC			Agreed
57.	Red Lumo	23.1.	Application [6300 6301]	Reference to RP within the statements have not been updated to MC			Agreed
58.	United Energy	23.1.	Application [6300 6301]	6301 – Change MC Retrospective – the detail within also needs to be updated to MC from RP.			Agreed
59.	AGL	23.3.	Initiation Rules	P107 I would expect the FRMP (or large Customer) could also initiate a change MC role			The scenario for using the CR63xx is for the FRMP to establish contract with MC outside of MSATS for a NMI, and then the new MC will use CR63xx to become the current MC for the NMI. AEMO considered adding CR68xx to WIGS to allow FRMP to initiate an MC change role however the volume of WIGS transactions for this request will be very low and it does not warrant adding CR68xx to WIGS
60.	AGL	27.1.	Application [6700 6701]	P117 – S27.1 Role is MC not RP – Grammar Paras 6700/6701 second line Delete second 'in' ...information in in ...			Agreed
61.	Red Lumo	27.1.	Application [6700 6701]	Reference to RP within the statements have not been updated to MC			Agreed
62.	AGL	27.3.	Initiation Rules	P117 Role is MC not RP			Agreed
63.	AGL	27.4.	RP Obligations	P118 Role is MC not RP			Agreed
64.	Red Lumo	27.4.	RP Obligations	Should this be updated from RP to MC?			Agreed
65.	Red Lumo	28.4.	AEMO Obligations	Document has 2 versions: <ul style="list-style-type: none"> Network Tariff Code (for each register ID) Network Tariff Code Inconsistent wording between clauses may lead to incorrect data updates. The network tariff is held on a meter register in the MSATS model and all registers belonging to a meter should be updated in case of change.			See comment for section 2.4 of this procedure.
66.	AGL	29.1.	Introduction	P124			AEMO clarifies that BCT currently can be used to change the MC role

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

				No information on using the BCT to make changes to an MC (failed or purchased)			
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Table 8 – MSATS Procedures: MDM

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
1.	Vector AMS	0	Page 2	Update footer number to v3.3. Remove blank page.			Noted.
2.	Ausgrid	0	General	The following comments relate to the general construct of the document:- The document title is not correctly represented in the document header.			Noted.
3.	Ausgrid	1.1	Purpose and Scope	What is the name of the document? MSATS Procedure: MDM Procedures? MSATS Procedures: MDM Procedures? MSATS Procedures: MDM Procedure? There is inconsistency between the cover page, this clause and the name of the document. The document name needs to be specified consistently – Including in the Related Documents sections of all cross referencing procedures.			Noted.
4.	AGL	1.1	Purpose and Scope	This purpose and scope do not describe why these procedures exist			AEMO notes respondent's comment. Refer to Glossary framework document, section 2.2.3.3
5.	Red//LUMO Energy	1.2	Definitions and Interpretation	Recommendation for inclusion of the following for any words/terms that are italicised: Italicised words and phrases which are defined in the National Electricity Rules have the same meaning within this Procedure.			This wording is already in the glossary, and the glossary forms part of each procedure.
6.	Ausgrid	1.3	Related Documents	'metrology procedure' is not a document.			Noted.
7.	Vector AMS	1.3	Commencement of Changes	For consistency with this table in other documents, remove the Reference column. Remove Location column if it is not being populated. Remove MDM Procedures, it is not a related document. Change 'metrology procedure' from a defined term to a document name.			Noted. AEMO agrees with the suggested changes and will remove "Location" column reference to MDM Procedures and update reference to Metrology Procedure.
8.	Ausnet Services	1.3	Related Documents	AusNet Services believe the CATS procedures should also be included in this list. This document is incorrectly named: MSATS User Reference Interface Guide With the removal of 1.7 all relevant use of the word day should be in italics as it's a defined definition in chapter 10 of the NER.			AEMO agrees with the respondent's suggested change and will include MSATS CATS Procedures reference. AEMO agrees and will update this reference. Suggested Change – consistent use of term "day".
9.	Active stream	1.3	Related Documents	Put the full titles of the documents in			Noted.
10.	ActewAGL	2	OBLIGATIONS	Again as stated in other responses why are the statements not dot points? Makes referring to the clauses very difficult			Noted.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
11.	AGL	2.1	General Obligations	P8 S2.1cl(3) Isn't the published settlement timeframe the ' timetable ' referred to in other procedures			AEMO notes respondent's comment. Amended to <i>timetable</i> for consistency throughout procedures.
12.	Active stream	2.1	General Obligations	3 – Are these settlements timeframes the "timetable" referred to throughout other documents? Active Stream do not believe timetable is the correct term as it relates to the spot market, not the settlements calendar			AEMO notes respondent's comment. Amended to <i>timetable</i> for consistency throughout procedures.
13.	Red//LUMO Energy	2.1	General Obligations	Update from a to an, 2.1.1 & 2.1.2, is this required?			Grammar – Use of grammar is correct, suggest no change.
14.	Red//LUMO Energy	2.2	AEMO	Marginal Loss Factors (MLFs) to be included in the glossary			The term only occurs once or twice in the same procedure. It doesn't warrant inclusion in the Glossary
15.	Vector AMS	3.2	Setup Functionality	3.2.3, MLF: For consistency of formatting, remove bolding from MLF. 3.2.3, MLF: Add MLF to Glossary document. Both distribution loss factor and marginal loss factor are defined in the NER; only DLF is in the Glossary. 3.2.3, point (3): Suggest rewording 'tagged as to be "peeled off" ' to 'tagged to be peeled off" '.			AEMO agrees with the respondent's suggested change and will remove bold formatting. The term only occurs once or twice in the same procedure. It doesn't warrant inclusion in the Glossary AEMO agrees with the respondent's suggested change and will update to "tagged to be peeled off".
16.	Origin Energy	3.2	Setup Functionality	3.2.3/3.2.4 # Parameter & Description Table for NSLP and non NSLP are identical. Are both required			AEMO notes respondent's comment. There is no change to the remove either table from 3.2.3 or 3.2.4. Both are accurate and directly related each clause.
17.	Pacific Hydro	3.2	Setup Functionality	Suggest the following rewording of 3.2.1: AEMO defines a Profile Area in MDM as the list of TNIs assigned to that Profile Area.			AEMO notes the respondents suggested changes and will update 3.2.1 to read: "A profile area in MDM is defined by a list of TNIs that AEMO assigns to that profile area."
18.	Red//LUMO Energy	3.2	Setup Functionality	3.2.11. Processing Overview 5. The system will then check active interval Datastreams for missing data from MDP's. Where a previous MDM stored substitute exists, this will be used. Where no previous MDM stored substitute exists and the interval datastreams' <i>metering data</i> is not available or profile shape interval data is not supplied, the system will use a proxy day profiling methodology to substitute the <i>energy</i> for profiling and <i>settlements</i> purposes. The proxy day will select values from the most recent day of the same day type and season type as the day being modelled. If no Historic Data is available, the system will use ADL divided by 48 for each <i>trading interval</i> . The system will then store the Substituted data in the table as an MDM substitute for use in future <i>settlements</i> runs (Case ID). Trading Interval is not within the glossary			Reference to trading interval has been amended to TI and AEMO has updated Glossary and framework document to include interval definition of TI.
19.	Vector AMS	4.2	Create a Profile Area	For readability, indent the second and subsequent sentences / points.			Noted.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
20.	Ausnet Services	5.1	Conditions Precedent	AusNet Services believe that if the below clause is being remove then 5.2 needs to have active in front of it. Refer to 5.2 A non interval NMI Datastream already exists in CATS with active status. If the Datastream does not exist it must first be defined in CATS (refer CATS Procedures) before this procedure can be implemented.			Refer to response provided in 5.2 for Ausnet Services.
21.	ActewAGL	5.2	MDP Obligations	Point (2) This should be put into a table same as other AEMO documents when listing data fields. With the oncoming of MC, why is AEMO not taking this opportunity to only have one file format (MDFF) that also loads into MSATS?			AEMO agrees with the respondent's suggested change and will include items listed in point 2 into a table. AEMO notes the respondents comment and suggested change, however this would be an additional change with no clear driver. Existing process adequately support current market activities. AEMO may review this in future.
22.	Ausnet Services	5.2	MDP Obligations	AusNet Services believes that the opening sentence should state For any active non-interval NMI Datastream in CATS, the			Agreed
23.	Active stream	6.1	Application	Doesn't exist			AEMO notes the respondents comment. Refer to Glossary framework document, section 2.2.3.3 for the description of MDM objective.
24.	ActewAGL	6.2	Conditions Precedent	Point (2) This should be put into a table same as other AEMO documents when listing data fields. With the oncoming of MC, why is AEMO not taking this opportunity to only have one file format (MDFF) that also loads into MSATS?			Refer to response provided in 5.2 for ActewAGL.
25.	Ausnet Services	6.2	Conditions Precedent	AusNet Services believe that if the below clause is being remove then 6.2 needs to have active in front of it. Refer to 6.2 An interval NMI Datastream already exists in CATS with active status. If the Datastream does not exist it must first be defined in CATS (refer CATS Procedures) before this procedure can be implemented.			Refer to response provided in 5.2 for Ausnet Services.
26.	United Energy	6.2	Conditions Precedent	Add new Bullet Point - - RegisterID			AEMO notes the respondents comment. No reasoning why Register ID is required for assessment and therefore no change.
27.	Ausnet Services	6.3	MDP Obligations	AusNet Services believes that the opening sentence should state For any active interval NMI Datastream in CATS, the			Refer to response provided in 5.2 for Ausnet Services.
28.	AGL	6.3	MDP Obligations	P18 – cl6.3 This is a procedure not a process			AEMO notes the respondents comment AEMO believe the language is appropriate, therefore no change to the introductory statement is required.
29.	Ausnet Services	7.1	Application	AusNet Services question the reason for leaving this section in when other sections have had this type of information removed.			AEMO agrees with the respondent's suggested change to delete 7.1 Application to be consistent with remainder of MDM Procedure.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
30.	Vector AMS	7.2	Define the Data Source	2 nd sentence: Format Keep with Next to remove orphan introductory sentence.			Noted.
31.	Vector AMS	7.4	Define the Profile Name	For readability, indent the second and subsequent sentences / points.			Noted.
32.	Ausnet Services	8.1	Application	AusNet Services question the reason for leaving this section in when other sections have had this type of information removed.			AEMO agrees with the respondent's suggested change to delete 7.1 Application to be consistent with remainder of MDM Procedure.
33.	Vector AMS	8.2	Settlement Data Scenario	<p>2nd paragraph: Reword this poorly worded sentence.</p> <p>1. The phrase 'if the scenario type has been defined' introduces two cases that this provision must address - where the scenario type is defined and where it has not. Only the former case is addressed in this provision.</p> <p>2. If only the former case is meant to be covered, reword sentence to state: 'To create a New Settlement Data Scenario, AEMO must provide the following information' and add a new point 1. 'Create a Scenario type, if not already created'.</p> <p>3rd paragraph: For readability, add a comma before 'or'.</p> <p>For clarity regarding the editing of a Settlement Data Scenario, indent points 6-11 and their introductory sentences.</p> <p>For clarity regarding the deletion of a Settlement Data Scenario, indent points 12-13 and their introductory sentence.</p>			AEMO notes respondent's comment. Refer to AEMOs response captured in 1.1 Formatting, A# Other Issues Related to Consultation Subject Matter.
34.	Pacific Hydro	8.2	Settlement Data Scenario	<p>The removal of 'calendar' from items 3 and 4 and leaving 'calendar' in items 9 and 10 is confusing. If the Glossary is not referencing those italicised terms which are defined in the NER then I suggest this is reviewed as the definition of 'day' in Chapter 10 is as follows. It makes no reference to business or calendar.</p> <p>day</p> <p>Unless otherwise specified, the 24 hour period beginning and ending at midnight <i>Eastern Standard Time (EST)</i>.</p>			As defined in the NER, <i>day</i> is a effectively a calendar day. References to calendar have been removed.
35.	Red//LUMO Energy	8.2	Settlement Data Scenario	<p>3. The number of <i>days</i> before the Case End Date to start freezing the NSLP.</p> <p>4. The number of <i>days</i> before the Case End Date to stop freezing the NSLP.</p> <p>'Calendar' has been removed from the above and days italicised whereas the following remain unchanged</p> <p>9. The number of calendar days before the Case End Date to start freezing the NSLP</p> <p>10. The number of calendar days before the Case End Date to stop freezing the NSLP</p>			<p>Refer to AEMO action/response provided for 8.2 above.</p> <p>As defined in the NER, <i>day</i> is a effectively a calendar day. References to calendar have been removed.</p>
36.	Ausnet Services	9.1	Introduction	This document is incorrectly named: MSATS User Referene Interface Guide			AEMO agrees and will update this reference.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
37.	Vector AMS	9.2	Report Outlines	Review formatting of paragraphs at the end of pages to remove any orphan headings or introductory sentences. Format these to Keep with Next. Remove blank page 31.			Noted. Agree, remove blank page. PL
38.	Momentum	9.2	Report Outlines	Page 22: Parties that have access to the report: AEMO, RP, FRMP, LR, LNSP, NSP2, MPB, MPC, MDP. M to Page 23: AEMO, RP(MC), FRMP, LR, LNSP(ENM), NSP2, MPB, MPC, MDP. <ul style="list-style-type: none"> RP to be striked off and replaced by MC. Also ENM to be included. 			AEMO agrees with the respondent's suggested changes AEMO will review ad update references to MC and ENM across MDM reports.
39.	Ausnet Services	9.2	Report Outlines	AusNet Services believe for: RM13 need to have the ENM and MC added like it has been for the RM15 report.			Refer to AEMO response above provided for 9.2.
40.	AGL	9.2	Report Outlines	Replace consumption with accumulation RM 14, 15 16 Use MC not RP P27 – Report MDM RM16 MC should have access to this data Pp27/28 – Report MDM RM17 MC should have access to this data P28 – MDM RM18 A version / combination of this report is required with the MC as one of the variables P30 – MDM RM22 This report should also be available to the MC P31 – MDM RM26 This report should also be available to the MC			See above.
41.	Endeavour Energy	9.2	Report Outlines	Procedural improvement: The LNSP should be given access to all the MDM RM reports to allow better management of network functions.			AEMO notes the respondent's view and comment. However no reasoning has been provided as to how the LNSP is able to better manage their network from receiving additional MDM reports, such as RM 16 – Level 1 Settlement Reconciliation Report for example. No change to the current list of MDM reports for LNSPs.
42.	Pacific Hydro	9.2	Report Outlines	MDM RM14 Parties that have access to the report: Strike our RP and remove the parentheses from the MC and remove the parentheses from the ENM. MDM RM13 – as the RP and LNSP have access to this report should the MC and ENM have access as per the report above?			Refer to AEMO response above provided for 9.2.

**POWER OF CHOICE PROCEDURE CHANGES (PACKAGE 1): DRAFT REPORT AND DETERMINATION
APPENDIX A – CONSOLIDATED SUMMARY OF SUBMISSIONS AND AEMO RESPONSES**

ITEM	RESPONDENT	CLAUSE	HEADING	METERING COMPETITION	EMBEDDED NETWORKS	METER REPLACEMENT PROCESSES	AEMO RESPONSE
43.	Active stream	9.2	Report Outlines	<p>Replace 'consumption' with accumulation, several instances throughout the document. ' with accumulation, several instances throughout the document.</p> <p>RM14 – should this not read MC (RP)?</p> <p>RM15&18, same as RM14</p>			<p>Noted.</p> <p>Refer to AEMO response above provided for 9.2.</p>