

FIVE MINUTE SETTLEMENT – METERING PROCEDURE CHANGES (PACKAGE 2)

PROCEDURE CONSULTATION

DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: AGL

Submission Date: 6 September 2019

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1. Context

This template is being provided to assist stakeholders in giving feedback about the changes specified in the 'Five-Minute Settlement Metering Procedure Changes – Package 2' Draft Procedures.

Please note, the change marked versions of the Draft Procedures highlights the changes required between the first stage Initial Draft Procedures and the second stage Draft Procedures.

The changes being proposed seek to enable the implementation of:

- The Five-Minute Settlement (5MS) Rule
- The Global Settlement (GS) Rule
- Changes to the delivery, format and content contained in the meter data files sent to AEMO.

General comments –

Procedure Application Date

In general, AGL has concerns about the applicable date for the commencement of these procedures.

In order for both the 5ms and the global market (soft start) to commence operation on 1 July 2021 a number of underpinning changes are required to be implemented, including non-contestable unmetered NMIs, Bulk crossing NMIs etc.

Many of these changes need to be initiated prior to 1 July in order to minimise the risk at market start.

AGL strongly suggests that consideration be given by the readiness / transition working group to implement as many changes as possible in a staged manner which minimises the impact of changes on the start date.

A number of document updates have an effective Date of 1 July 2021 or later, including those dealing with elements associated with unmetered supply. Whilst that is reflective of the commencement date of the 5 Minute Rule change, the rules do not limit the early introduction of additive changes. AGL suggests there are three significant dates for these procedures to go live;

Pre 1 Jul 2021	Containing additive changes which can be applied before the commencement date of the rules (5ms or Global) (e.g. introduction of NCONUML NMI classification code).
1 Jul 2021	Containing changes which can only take effect from 1 July 2021 (e.g. removal of the CR which allows prospective change of LR on LARGE and SMALL)
6 Feb 2022	Containing changes in line with the commencement of the Global Settlement Rule

For instance, all changes for Unmetered supply should be in place such that its part of any Dec 2020 builds.

Meter Interval reversion

While we understand certain meters are mandated to become 5-ms meters, however the Rules and procedures are silent if a non-mandated meter (eg pre 1 Dec 2018 meter type 4 / 5) can be converted to 5-minute intervals and later reconfigured back to 15/30-minute intervals. AGL feels that would not be an inappropriate outcome, and suggests that for clarity amongst all participants that there be a prohibition on reverting a meter once converted to 5-ms.

Meter Interval on Installation from 1 July 2021

AGL understands that the Rules allow for meters installed during the transition period (1 Jul 2021-1 Dec 2022) to be installed as 30 min meters, and then reconfigured by 1 Dec 2022 to 5 min intervals.

AGL does not consider this an appropriate or efficient outcome. All participants must be ready for 5 min data from 1 July, and AGL sees no benefit in having further 30 min meters installed and then being reconfigured for 5 min data.

AGL would suggest that for clarity to Metering Providers, Metering Data Providers and Market Participants that the Metrology Procedures specify that any meter installed from 1 July 2021 must be configured as a 5 min meter.

2. Metrology Procedure: Part A

Section Met A	Description 6 Feb 2022	Participant Comments
3.1	Requirements under National Measurement Act and Use of Standards	Agree
3.4	"x" values – Calculation and Use	Agree

Section Met A	Description 6 Feb 2022	Participant Comments
12.3, 12.7	Provisions for non-contestable unmetered loads	<p>12.3 Agree</p> <p>12.7 (c) – AGL is unclear exactly how this amendment would work or what it means.</p> <p>We would understand the calculation methodology and agreed load for an unmetered device to be the formula used to establish effectively the daily load and profile of a device, eg Device A, Device B etc.</p> <p>The inventory table should describe the location of each connection of these devices the relevant customer, the number of devices connected and designated as Device A, Device B etc., as there may be multiple customers with the same device at multiple locations (eg multiple councils with multiple watchman lights at multiple locations). Assuming a single NMI per customer – the section of inventory table should confirm customer by device.</p> <p>There needs to be a reconciliation of the number of actual devices held within an inventory table, and a mechanism to establish what and where devices are connected and for which customer, and a link from that to the load calculation for that device type. Eg All device A’s have a specified load (and load profile), all Device Bs have their load and load profile etc.</p> <p>AGL suggests that the clause be re-worded as:</p> <p>(c) Where there is a discrepancy between the Inventory Table or NMI listing held in the <i>metering data services database</i> for a <i>non-contestable unmetered load</i> and the physical inventory, then calculation methodology and Agreed Load Physical Inventory, the calculation methodology and Agreed Load the Physical Inventory is to be taken as prima facie evidence of the actual number of Unmetered Devices.</p> <p>(d) Each item in an inventory table or NMI listing should have an agreed load and load profile calculation associated with it, together with a clear record of the relevant customer, and asset location</p>

Section Met A	Description 6 Feb 2022	Participant Comments
12.7		<p>All the metrology procedures are predicated on the assumption that any connection undertaken within the NEM is done so through the market processes, and therefore the retailer has arrangements with the customer and authorised the energisation (eg NER 5A.F.7).</p> <p>Within the provisions for Non-Contestable Unmetered Load the metrology procedures are allowing for individual on-market NMI connections and use of bulk NMIs for multiple connections.</p> <p>AGL notes that historically the off-market processes for a new on-market unmetered connection have been very poor, resulting in mismatches between connections, customers and loads.</p> <p>AGL expects that with on-market single connection NMIs the existing B2B processes lead to customer and connection information being shared between DB and RB. However, when DBs choose to use bulk NMIs for connections, there is no clear obligation or process on the DBs to ensure the connection information is shared with the RB, thereby creating a disconnect.</p> <p>Further, as the device is unmetered, there are no secondary triggers (eg meter data streams) to ensure that there is a reconciliation and activation process.</p> <p>AGL strongly suggests that an additional clause be added to 12.3:</p> <ul style="list-style-type: none"> (c) <u>Where an inventory table is used for non-contestable unmetered supply, the MDP must ensure that all relevant customer details and device information (including ADL, Location, load, load profile) is shared with the Retailer prior to energisation;</u> (d) <u>For a non-contestable unmetered supply, the Distributor must ensure that the Retailer has authorised the energisation.</u>

3. Metrology Procedure: Part B

Section Met B	Description 6 Feb 22	Participant Comments
6.1(d)	Amendments	AGL is unclear how clause (d)(i) operates. When a device is installed, there should be an agreed load and load profile. That device may be subsequently changed, but until the DB and RB are aware of such a change, the initial load and load profile would be deemed to be correct until a change is identified or notified, in which case the data is substituted from the change date and possibly clause (d)(ii) operates, or possibly the meter data is re-released with new actuals (given the output of a calculation is always an actual).

Section Met B	Description 6 Feb 22	Participant Comments
6.1(e)	Notification of substituted Data	<p>AGL believes that clause 6.1(e) is not sufficient in cases where bulk NMIs are being used.</p> <p>Where unmetered supplies have a single NMI allocation, changes to the meter data file can be directly associated with the device and customer. However, when changes to a load are made to an element of a bulk NMI, it is not possible to identify the impacted device(s) without additional information.</p> <p>AGL believes that a further clause is required to ensure that the affected FRMP is advised of the element which has changed and the reasons for that change.</p> <p>AGL suggest a clause such as:</p> <p><u>(e)(ii) Where changes are made to non-contestable unmetered loads recorded in inventory tables, the MDP must provide supporting information which details the relevant changes.</u></p>
12.3	Profile Area five-minute load profile calculation	<p>Agree</p> <p>Although AGL notes its previous comments about the quality of the proposed methodology.</p>
12.4	Applying the five-minute profile to 15-minute and 30-minute metering data for a Profile Area	<p>Agree</p> <p>Although AGL notes its previous comments about the quality of the proposed methodology.</p>

Section Met B	Description 6 Feb 22	Participant Comments
13	Non-contestable unmetered loads	See following comments
13.1.2(b)	Non-contestable unmetered loads	<p>It is unclear what the procedures what information would be required for a 'list' of non-contestable unmetered supplies. AGL would prefer that the data elements be specified in a file format so that there is a consistent approach by all MCs (DNSPs) which would allow lists to be uploaded and properly managed. It is expected that this list should contain information relating to the</p> <ul style="list-style-type: none"> • Customer; • connection point; • device Identifier; • device load and profile (which may be linked via a device ID); • Connection location; <p>Device Identifiers should be an agreed identifier and load / load profile must be agreed between parties prior to energisation.</p> <p>This list would provide the inventory of what is connected, where it is connected, and who the customer is.</p>

Section Met B	Description 6 Feb 22	Participant Comments
13.1.2(d)	Non-contestable unmetered loads	<p>AGL does not believe that this information is sufficient.</p> <p>This table / information should contain the:</p> <ul style="list-style-type: none"> • load of the device; • load profile; • location; and • customer; <p>The customer needs to be identified for each device as multiple customers can have similar devices (eg CATV Power supplies, Council Sprinkler systems etc.) and the device identifier may be the same, but agreed load may be different, due to different operating requirements or different operating environments (eg higher ambient temperatures).</p>

Section Met B	Description 6 Feb 22	Participant Comments
13.1.2(e)	Non-contestable unmetered loads	<p>AGL does not believe that this obligation is adequate.</p> <p>AGL believes that all calculation methodologies should be agreed with the FRMP prior to energisation as well as being made available to the FRMP on request, or even provided annually to ensure load information is consistent and reconciled.</p> <p>AGL does not believe that the clause should identify relevant Registered Participants (as this could include all Retailers in a distribution area, as a result of the impact on UFE) but rather the FRMP.</p> <p>The agreed load calculation methodologies would provide commercial information which would not be public.</p> <p>AGL does consider that this information could be reviewable by AEMO, if requested by a participant, to ensure that the arrangements are not detrimental to other participants through UFE, although AGL notes that this issue is no different to MDPs adjusting meter data and not advising the market.</p> <p>AGL suggests:</p> <p>(e) The MC must ensure that details of the calculation methodologies and Agreed Load <u>are agreed prior to energisation and are</u> provided to relevant Registered Participants <u>FRMP</u> when requested and <u>annually in any case</u>.</p>

Section Met B	Description 6 Feb 22	Participant Comments
13.1.4	Non-contestable unmetered loads	<p>AGL suggests that a further clause is required to ensure each device is individually identified and the connection location registered.</p> <p><u>(d) Where an unmetered load NMI contains a non-contestable unmetered load of different types, the MC must ensure that there is supporting information identifying the different devices, device loads, load profiles, connection locations and customer.</u></p>

Section Met B	Description 6 Feb 22	Participant Comments
13.2.1 13.3.1	Non-contestable unmetered loads	<p>(b) AGL agrees</p> <p>(c) AGL does not agree with clause (c), which requires an AEMO approval.</p> <p>The unmetered load calculations are based on a variety of issues, commercial and technical, and may be adjusted over time as more information is obtained, which would make an approval process more time consuming and unnecessary to the outcome.</p> <p>AGL does understand that the calculation should not impact other participants through UFE but considers that this is minor and does not warrant AEMO approval.</p> <p>AGL accepts that AEMO may review the calculation on request of another participant to ensure that the calculation is not detrimental to other participants, but that should be the extent of the response.</p> <p>As AGL has noted, the procedures have not dealt with changes to meter data (eg as a result of incorrect CT ratios) and the impact on UFE as a result of these changes, which AGL would consider to be a more substantial problem and warrant an appropriate processes.</p> <p>AGL has suggested that where devices are being rolled out nationally (eg NBN, Telstra) that it would be useful for a small party chaired by AEMO to establish the load and load profile for these devices so that the load and load profile can be consistently applied by networks and retailers across the NEM in an efficient manner.</p>

Section Met B	Description 6 Feb 22	Participant Comments
Various	Inclusion of the word “affected”	<p>AGL notes that in multiple clauses the word affected has been included where MDPs make data substitutions. However, as previously raised, a material substitution (eg incorrect CT Ratios) can impact the UFE calculation and all affected retailers.</p> <p>While AGL generally do not see value in having multiple parties (eg 50 retailers) advised every time a substitution is made, where a material change is made which can affect UFE, AGL does however consider that there needs to be a process to ensure AEMO is advised of such changes, so that there can be a consideration of the impact on settlement of UFE. Further, while individual adjustments may not be material in each individual case, the impact of all the adjustments in a period could be material and warrant a revision.</p> <p>AGL suggests that annually a revision is undertaken with a longer period to deal with all these minor changes.</p> <p>AGL also suggests that further analysis of managing these outcomes is needed, particularly those which occur outside of regular settlement cycles.</p>

4. MSATS Procedures: MDM Procedures

Section MDM	Description 1 Jul 2021	Participant Comments
3.2.10	R30 – NSL Freeze	Noted
3.2.15, 3.2.17	Unaccounted for energy (UFE)	<p>Noted</p> <p>However, the description of the calculation does not accommodate any non-market generation flows. Given the very high levels of Solar generation in some areas, the exclusion of this quantity from the calculation may distort the UFE calculation.</p> <p>Given that AEMO is receiving all meter data from 1 July, AGL suggest that in a small confined area (AGL would suggest Victoria due to the installation of AMI metering), that a calculation of UFE be undertaken including and excluding the solar generation to determine if the solar exclusion is impacting UFE.</p> <p>AGL also suggest that for Victoria (as a result of the AMI metering) that UFE be first calculated at a 30-minute level prior to the profiling of the 30 min data to 5-minute data., to determine what level of influence the profiling is having on the UFE calculations.</p> <p>Again, this could be undertaken in the same area.</p> <p>AGL believes that this greater understanding will prove beneficial when considering UFE impacts outside Victoria, where the greater use of accumulation metering and profiling will occur.</p>
5.2	MDP Obligations	Noted
6	LOAD DATA – INTERVAL NMI DATASTREAM	Noted

9.11- 9.14	MDM RM Reports	AGL notes the new reports, but does question why the MC does not have access to these reports (as the MC has the obligation to ensure the MDP is undertaking their work) or the Retailer where the retailer appoints the MC (as the retailer has both a contractual and settlement interest) in this data.
9.14	RM43	<p>AGL suggests that the RM 43 report could be enhanced by having the assigned percentage added to the information. In order to reconcile this value, additional information will be required, which should be included in this report</p> <p>For example, the UFE is assigned based on the percentage of usage by our customers by FRMP/Profile area. In order reconcile this value we need to first work out the percentage used by our customers, and then ensure that the UFE assigned to us is the same percentage. We require 2 additional pieces of information to perform this;</p> <ul style="list-style-type: none"> • Total injections by profile area • Total UFE by profile area <p>Potentially this could be 2 new reports with similar information to the RM43 report.</p> <p>Also in the Reconciliation workshop a few months ago, there was discussion about adding additional data to the RM27 - ie The basic read in which the profile was set.</p> <p>AGL is unclear on whether this decision has been taken. if not, AGL would propose that this be implemented. It was noted by other retailers that the more information the better for our reconciliation.</p> <p>Overall, AGL would like to suggest that a workshop be held with the retailer reconciliation teams as part of the development of these reports and any others which may be required) to ensure all necessary data is being provided foe efficient settlement and reconciliation.</p>

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5. MSATS Procedures: CATS Procedure Principles and Obligations

Section CATS	Description 6 Feb 22	Participant Comments
2.3	Local Network Service Provider	AGL notes this clause, but questions whether is this adequate as an LNSP (by definition) also includes an ENM (see Glossary 2.10). AGL also notes the amendment in cl 2.10(g).
3.3	Transaction Types	Possible typo in amendment. Is there a section 0 ?
Various	Reference to NMI Procedures Appendix E	Noted
4.4	Use of LR/ENLR within this Procedure	AGL notes the proposed change, but as a LR will be GLOPOOL / POOLXXX then there is no specific participant to object to a change or receive notification of a change. As such, AGL suggests for clarity that the tables should only identify the activities which would only affect an ENLR.
4.10	NMI Classification Codes	Noted We also note that this CATS change is not scheduled to go live until Feb 2022, and consider this should be live Dec 20.
4.12.2	Datastream Status Codes	Noted
4.13.1	Consequences of Allocating Certain Metering Installation Codes	Noted
5	MSATS REPORTS	Noted

Section CATS	Description 6 Feb 22	Participant Comments
Various	References to LR and ENLR	<p>Noted – see above comment</p> <p>Also, AGL questions the standards that are being used by AEMO within the CATS documents for Roles.</p> <p>During PoC, AEMO strongly argued that the Role column was to be left as RP, as this was the field name. AEMO now seems to be defining the LR field by role, not field name.</p> <p>Will AEMO be updating the system field name from LR to ENLR, and if so, why can't the RP role be updated to MC ?</p> <p>If not, then AGL suggest that for the consistency that AEMO argued for that the field name be left as LR, and AEMO will need another mechanism to identify ENLR allocations.</p>
9.6	MC Requirements	Likely typo in amendments
11, 13, 15, 16, 17, 20, 21, 22, 23, 24, 25, 26, 27, 30, 31, 32, 39, 40	Inclusion of NCONUML	<p>suggest amend LR for clarity as these cannot be embedded UMS.</p> <p>le LR (as GLOPOOL)</p> <p>AGL also notes that the timeframe rules for creating a NMI have not been updated to include a NCONUML. AGL would suggest the same period would apply to a small NMI.</p> <p>AGL also notes that the objection rules have not been updated for a NCONUML.</p>

Section CATS	Description 6 Feb 22	Participant Comments
15 / 16 / 17 / 20 / 21 / 22 / 23 / 27 /	Inclusion of NCONUML	<p>AGL notes that the requirements for this transaction for a NCONUML NMI require details for multiple fields (eg meter ID, data stream, Dial format, multiplier value etc.) which do not exist and would therefore be populated with 'dummy' data or no data.</p> <p>AGL suggests that for consistency that a table be established for all these fields so that the MDP is populating them consistently, noting that there may be different options for bulk Load NMIs vs single load NMIs.</p>
24	Inclusion of NCONUML	<p>AGL is unsure why an unmetered NMI would need to have a next scheduled read updated. AGL would expect that the data streams for these devices would be issued daily, as they must be provided as 5 min interval data and the same timetables should apply.</p>
25	Inclusion of NCONUML	<p>AGL notes that with the inclusion of NCONUML the DLF is now considered relevant information as part of the NMI data.</p> <p>Historically, DLFs have not been considered when establishing NCONUML load / load profiles.</p> <p>AGL seeks clarity, as this may have an impact on the current arrangements customers have with networks and host Retailers for the provision of unmetered load and may require re-negotiation of agreed load.</p>

Section CATS	Description 6 Feb 22	Participant Comments
30	Inclusion of NCONUML	<p>AGL does not support this change for a NCONUML.</p> <p>Connections for Unmetered supplies are agreed between the three – including upper load size, load and load profile.</p> <p>If a NCONUML is to be transferred between LNSPs, then the connection will have to be reviewed and potentially a new contact established between all parties.</p> <p>AGL suggests that for NCONUML that this would be best handled by NMI abolishment and new NMI creation.</p>
31		AGL does not support this change for NCONUML as the LNSP is the only MDP which can provide the data.
Various	Updated table references	

6. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section WIGS	Description 6 Feb 22	Participant Comments
1.4	WIGS Codes and Rules for a Change Request	Noted
Various		AGL notes that change from LR to ENLR in various tables and refers AEMO to the CATS comment about column naming.
Various	Inclusion of "NREG" NMI Classification Code	Noted
Various	Inclusion of "BULK" NMI Classification Code	Noted
Various	Inclusion of "XBOUNDRY" NMI Classification Code	Noted
Various	Inclusion of "DWHOLSAL" NMI Classification Code	Noted
Various	Provisions for embedded network local retailers (ENLR)	Noted – see comments in CATS response Are roles and fields being changed and will RP also be changed ?
Various	Removal of Local Retailer (LR) references	See comments in CATS response

7. National Metering Identifier

Section	Description 1 Jul 2021	Participant Comments
VRH	Effective date updated to 1 July 2021	
Appendix E	Inclusion of appendix to better communicate NMI Classification and Role requirements	
2.3.1(b)	Common Requirements across the NEM	<p>AGL does not believe that this clause is adequate as it stands. If a NMI is to contain multiple unmetered devices, then it must have a supporting inventory list which contains all relevant information.</p> <p>AGL suggests that (b) be extended as such:</p> <p>(b) The NMI may contain different agreed Unmetered Device loads or Unmetered Device types. One NMI is required for each type 7 metering installation. Individual Unmetered Device loads may be added to and removed from the NMI without the need to change the NMI. <u>There must be a detailed inventory table to support the use of such a NMI.</u></p>

Section	Description 1 Jul 2021	Participant Comments
2.3.1(g)		<p>AGL believes that this is too generic. AGL would prefer a standardised approach across the NEM, but at the very least, the procedure should involve the FRMP, ie:</p> <p>AEMO expects that each LNSP has a procedure <u>which has been agreed with the FRMP</u> for the allocation of NMIs for Unmetered Device supplies, which will be available for review by the Jurisdiction or AEMO on request.</p>
2.4	Allocation of NMIs for non-contestable unmetered loads	<p>See related comments regarding supporting inventory lists. AGL suggest the inclusion of a new clause after (b) which aligns with the proposed clauses for Metrology A</p> <p><u>(c) Where a NMI is used for multiple devices, there must be an inventory table to support the allocated load on that NMI and the MDP must ensure that all relevant customer details and device information (including ADL, Location, load, load profile) is shared with the FRMP to support changes to devices assigned to the NMI.</u></p>
6	Changes to DATASTREAM SUFFIX	Noted.

Section	Description 1 Jul 2021	Participant Comments
A.19, A.20	Non Contestable Unmetered Load – One NMI With Multiple Devices	<p>AGL suggest some re-wording</p> <p>A.19 Non Contestable Unmetered Load – One NMI With Multiple Devices</p> <ul style="list-style-type: none"> • Multiple non contestable unmetered connections, multiple devices • All devices have the same TNI, DLF, FRMP and LNSP for a given customer • Three End Users • Three NMI's <p>Typo in point 1 – 'multiple'</p> <p>Dot point 2 is redundant as it is covered by dot point 3</p>

Section	Description 1 Jul 2021	Participant Comments
A20		<p>AGL suggests that the descriptions are not correct:</p> <p>A.20 Non Contestable Unmetered Load – One NMI with One Device</p> <ul style="list-style-type: none"> • Single Connection, single or multiple devices • All devices have the same TNI, DLF, FRMP and LNSP for a given customer • Three end users • Five NMI's

8. NEM RoLR Processes – Part A

Section	Description 6 Feb 22	Participant Comments
Various	Removal of first and/or second tier references	<p>AGL notes the removal of first and second Tier but suggests that some consideration of the changes and impacts on the upcoming embedded network regime may require the first/second tier functionality and processing.</p> <p>As these procedures recognise ENLRs, they will also need to recognise second tier customers and processes related to second tier customers.</p>
Various	Provisions for ENLR	Noted.

9. Service Level Procedure: Metering Data Provider Services

Section	Description 1 Jul 2021	Participant Comments
2.4	Specific obligations for MDP - Category D	Noted.
3.7	Metering Data Processing Requirements	AGL Supports the change.
3.10.2	Non-contestable Unmetered Load Calculation Methodologies and Agreed Loads	Note – Typo 3.10.2(b)(ii) – change to ‘Metrology’. AGL is unclear if these requirements are adequate, as in the case of bulk NMI, there needs to be a link between the asset count, the asset, the asset location, asset load/load profile and customer. This information and link does not presently exist within Metrology B or this procedure.
3.12.4	Delivery of Settlements Ready Data	AGL supports the amended completion percentage.
3.12.5	Method of Delivery of Data	Noted. CI 3.12.5 (c)(i) and (c)(ii) – consistency of date for 1 July 2021.
5	METER CHURN DATA MANAGEMENT	AGL notes the inclusion of ‘other relevant’ participants but considers that this may be unclear and suggests that the relevant participants are listed, given the potential expansion of affected parties due to UFE allocation.

10. Exemption Procedure: Metering Installation Data Storage Requirements

Section	Description 1 Oct 19	Participant Comments
1.1	Purpose and scope	Noted.
1.2	Definitions and interpretation	Noted.
2	APPLICATION PROCESS	Change for VicAMI noted.
2.1		AGL queries whether these exemptions should apply to existing Cross Boundary Metering Installations, as they have the same effect on settlements as a Bulk supply point would.
2.1(b)		Footnote 1 seems unnecessary, as the information is specified in CI 1.2 Definitions.
2.2	Applicant	<p>AGL notes the 30 day limit for exemptions but considers that this limit is potentially too severe for a residential VicAMI meter, and may force the replacement of an unnecessary number of meters were they to be configured for 5 ms.</p> <p>AGL considers that a lower threshold is appropriate for a residential meter as long as the Victorian DB has the ability to attend, download and rectify any comms issues which may arise prior to the data being overwritten.</p> <p>As the original Rule was based on transmission meters and the VicAMI component was added later, AGL believes that AEMO has some discretion to select a more appropriate timeframe.</p>

Section	Description 1 Oct 19	Participant Comments
2.5.2		<p>AGL supports the exemption of VicAMI meters, as a potential requirement to replace a meter for a residential customer would seem unnecessary and in contrast to the National Electricity Objective.</p> <p>AGL also believes that a different recording period is appropriate for VicAMI meters (compared to larger meters) as they are only dealing with residential load.</p>

11. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
2.7.7	Exemptions	Noted.
5	GLOSSARY	Note inclusion of Agreed Load for NONCUMUL.

12. MDFF Specification

Section MDFF	Description 1 Jul 21	Participant Comments
1.1	Addition of AEMO per initial draft	AGL notes that there have been no changes from the initial draft and supports that change.