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DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK MSWG DISCUSSION

METER CHURN PACKAGE

MPB SLP Document

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1. Proposed Changes

- SLP Metering Provider Services Category B for Metering Installation Types 1, 2, 3, 4, 5 and 6

NOTE: No proposed changes have been populated please refer to mapping documents and change marked procedures. Please complete where necessary

Please include your comments in the ‘Participant Comment’ column below.

A. Proposed Changes to the Meter Churn Package

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
1	PROPOSED/ REQUESTED CHANGES			
	General Use of <i>service level procedure</i> in MDP SLP and MPB SLP		Energy Australia The MDP SLP alternates between capitalised and lowercase use of Service Level Procedure, whereas the MPB uses the Rules italicised <i>service level procedure</i> . As this is a defined term in the Rules the MDP SLP needs to have all uses of <i>service level procedures</i> italicised to reflect the Rules and be consistent with MPB SLP.	AEMO agrees and has ensured that this document is consistent. The term “service level procedure” is not a defined term in the Rules, rather the plural form, “service level procedures” is defined which refers to both the MDP and MP requirements as detailed in 7.14.1A of the NER.
4.6.2	New Clause		Endeavour New clause 4.6.2: <u>The Metering Provider must have a process to ensure that MSATS is updated as follow:</u> <ul style="list-style-type: none"> a) <u>for a type 6 to a type 6 Meter Churn</u> <ul style="list-style-type: none"> i. <u>the meter status of the removed meter is set to ‘R’ on the day of the Meter Churn</u> ii. <u>the meter status of the installed meter is set to ‘C’</u> 	AEMO agrees in part, with amendments as follows in a new section 4.11.6: <u>The Metering Provider must have a process to ensure that MSATS is updated as follows:</u> <ul style="list-style-type: none"> a) <u>for a type 6 to a type 1, 2, 3, 4, 5, or 6 Meter Churn meters are:</u> <ul style="list-style-type: none"> i. <u>removed in MSATS on the day of the physical removal of the meter(s).</u>

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			<p><u>on the day of the Meter Churn</u></p> <p>b) <u>for a type 6 to a type 1, 2, 3, 4, or 5 Meter Churn</u></p> <p>i. <u>the meter status of the removed meter is set to 'R' on the day of the Meter Churn</u></p> <p>ii. <u>the meter status of the installed meter is set to 'C' on the day of the Meter Churn</u></p> <p>c) <u>for a type 1, 2, 3, 4, or 5 to a type 6 to Meter Churn</u></p> <p>i. <u>the meter status of the removed meter is set to 'R' on the day after the Meter Churn day</u></p> <p>ii. <u>the meter status of the installed meter is set to 'C' on the day after the Meter Churn day</u></p> <p>d) <u>for a type 1, 2, 3, 4, or 5 to a type 1, 2, 3, 4, or 5 to Meter Churn</u></p> <p>i. <u>the meter status of the removed meter is set to 'R' on the day of the Meter Churn</u></p>	<p>ii. <u>installed in MSATS on the day of the physical installation of the meter(s).</u></p> <p>b) <u>for a type 1, 2, 3, 4, or 5 to a type 6 Meter Churn meters are:</u></p> <p>i. <u>removed in MSATS on the day after the physical removal of the meter(s).</u></p> <p>ii. <u>installed in MSATS on the day after the physical installation of the meter(s).</u></p> <p>c) <u>for a type 1, 2, 3, 4, or 5 to a type 1, 2, 3, 4, or 5 Meter Churn meters are:</u></p> <p>i. <u>removed in MSATS on the day of the physical removal of the meter(s).</u></p> <p>ii. <u>installed in MSATS on the day of the physical installation of the meter(s).</u></p>

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			<p>ii. the meter status of the installed meter is set to 'C' on the day of the Meter Churn</p> <p>New clause added to ensure that meter details are managed in the same manner as other data in MSATS, eg data streams, metering data, participant details etc</p> <p>Note that due to timing there may be no current meter in MSATS while the new Meter Provider is not yet in MSATS.</p> <p>Also the diagrams in section 8 of the MDP SLP should be added here to help explain the obligations</p>	
4.8	<p>Meter Churn Management</p> <p>The <i>Metering Provider</i> must provide relevant <i>NMI Standing Data</i> and <i>metering register</i> information to support the requirements of the FRMP Churn Procedure.</p> <p>The <i>Metering Provider</i> must only undertake meter churn when the request to do so has been provided by a <i>responsible person</i>, or a <i>financially responsible Market Participant</i> in accordance with the FRMP Churn Procedure.</p>		<p>Ausgrid</p> <p>Rewording</p> <p>The MPB undertaking the changes to the metering installation must contact the existing MDP to:-</p> <ul style="list-style-type: none"> i. facilitate a final read of the meter(s) pending removal (1-4 only); and ii. identify the new MDP (who to send churn data to); and iii. return removed equipment; and iv. complete and return any required paperwork <p>The MPB undertaking the changes to the metering installation must contact the new</p>	<p>AEMO agreed with the principal in the Ausgrid submission. The new section 4.11 Meter Change Process and section 4.12 Metering Installation Change Process, include provisions for all of the items listed in the submission.</p>

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			MDP to:- i. facilitate the commissioning of the metering installation; and ii. identify the old MDP (who to expect churn data from)	
4.8	<p>Meter Churn Management</p> <p>The <i>Metering Provider</i> must provide relevant <i>NMI Standing Data</i> and <i>metering register</i> information to support the requirements of the FRMP Churn Procedure.</p> <p>The <i>Metering Provider</i> must only undertake meter churn when the request to do so has been provided by a <i>responsible person</i>, or a <i>financially responsible Market Participant</i> in accordance with the FRMP Churn Procedure.</p>		<p>Energex</p> <p>4.8 The FRMP Churn Procedure does not really detail how a request is made just what they must be provided with. Will MP's have an issue with this?</p>	<p>AEMO – Alterations have been made to the section (now 4.11.1, to remove the link to the FRMP Churn Procedure and focus on the requirements that the MPB is obliged to comply with. The method for sending the request is not determined in the procedure, although the FRMP Churn Procedure does require the FRMP to notify the current RP of intent to change metering and become the RP in advance in accordance with the MSATS Procedures.</p>
4.8.1 & 4.8.2	<p>The <i>Metering Provider</i> must provide relevant <i>NMI Standing Data</i> and <i>metering register</i> information to support the requirements of the FRMP Churn Procedure.</p> <p>The <i>Metering Provider</i> must only undertake meter churn when the request to do so has been provided by a <i>responsible person</i>, or a <i>financially responsible Market Participant</i> in accordance with the FRMP Churn Procedure.</p>		<p>Acumen</p> <p>Can this clause better clarify what a “request” is? I am assuming that it is a relevant Change Request as per CATS procedures, if so can this clause be modified to reflect this.</p> <p>AEMO – Acumen stated clause 4.8.1 in their feedback but AEMO believe the feedback is related to 4.8.2.</p>	<p>AEMO refer Acumen to the response to the Energex submission on section 4.8 above.</p>

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4.8.1	The <i>Metering Provider</i> must provide relevant <i>NMI Standing Data</i> and <i>metering register</i> information to support the requirements of the FRMP Churn Procedure.		<p>Ausnet Services</p> <p>Re 4.8.1 AusNet Services suggests burdening the Metering Provider “to support the requirements of the FRMP Churn Procedure” is unnecessary and should be deleted. The FRMP should have an adequate commercial agreement with the Metering Provider “to support the requirements of the FRMP Churn Procedure”. Suggest the following changes are made, noting changes are in red:</p> <p>4.8.1 The Metering Provider must provide relevant NMI Standing Data and metering register information to support the requirements of the FRMP Churn Procedure.</p> <p>Suggest deleting the: “to support the requirements of the FRMP churn procedure”</p>	AEMO refer Acumen to the response to the Energex submission on section 4.8 above.
4.8.1	The <i>Metering Provider</i> must provide relevant <i>NMI Standing Data</i> and <i>metering register</i> information to support the requirements of the FRMP Churn Procedure.		<p>UE</p> <p>4.8.1 UE suggest that the MP must provide the NMI standing data and meter register information for any metering alteration not just Meter Churn. The addition of ‘support the requirements of the FRMP churn procedure’ can be deleted. The necessary information should already be in MSATS</p>	AEMO refer UE to the response to the Energex submission on section 4.8 above.

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			<p>and be part of the MP obligation to update/maintain in MSATS via the CATS Procedures.</p> <p>Suggest deleting the: ' support the requirements of the FRMP churn procedure'</p>	
4.8.2	<p>The <i>Metering Provider</i> must only undertake meter churn when the request to do so has been provided by a <i>responsible person</i>, or a <i>financially responsible Market Participant</i> in accordance with the FRMP Churn Procedure.</p>		<p>AGL</p> <p>AGL would like to question in particular for type 1-4 scenarios where the incoming Financially Responsible Market Participant intends on becoming the new Responsible Person (where they select to become FRMP and RP as part of the transfer request) and the customer wants the meter churn to occur on the transfer date.</p>	<p>AEMO refer AGL to the response to the Energex submission on section 4.8 above.</p>
4.8.3	<p>New Clause</p>		<p>Endeavour</p> <p>New clause 4.8.3:</p> <p><u>The Metering Provider must not make any changes to a metering installation unless:</u></p> <p>a) <u>they are the Meter Provider in MSATS or</u> <u>there is a change request nominating them as the Metering Provider and the change request has passed the objection logging period</u></p> <p>New clause added to ensure proposed role changes are raised and objection periods have expired prior making any changes to</p>	<p>AEMO – Agreed, also see response to Energex submission on section 4.8 above. The new section 4.11.1 reads as follows:</p> <p>4.11.1 The Metering Provider must only undertake meter churn when the request to do so has been provided by a responsible person or the financially responsible Market Participant for the Market Load in MSATS and:</p> <p>a) they are the Meter</p>

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			the metering installation.	Provider in MSATS, or b) there is a change request nominating them as the Metering Provider and the change request has passed the objection logging period in accordance with the MSATS Procedures.
4.12	<p>Meter Change Process From Installation Types 1, 2, 3 or 4</p> <p>4.12.1 Where a <i>Metering Provider</i> undertakes to perform <i>metering installation</i> changes from a type 1, 2, 3 or 4 to a type 1, 2, 3, 4 or 5 <i>metering installation</i> (and to a type 6 subject to the jurisdictional reversion policy in the <i>metrology procedure</i>), the <i>Metering Provider</i> must undertake the following activities before carrying out any installation change:</p> <p>a) The <i>Metering Provider</i> must make reasonable endeavours to contact the current <i>Metering Data Provider</i> prior to undertaking any change of metering and:</p> <p>i. Provide the current Metering Data Provider with the details of the new Metering Data Provider and new Metering Provider;</p> <p>ii. Request and verify that the current Metering Provider undertakes a final read to recover any metering data since the meter was last interrogated; and</p> <p>iii. Note the metering installation details and times on the relevant Meter Change Installation Notice or site commissioning test sheet.</p> <p>4.12.2 On completion of the <i>metering installation</i> the</p>		<p>Ausgrid</p> <p>Why wouldn't this be included under Meter Churn Management in clause 4.8?</p> <p>Otherwise covers comments against clause 4.8 above – At least in part.</p>	<p>AEMO, in consultation with the MSWG agreed with the proposal in the Ausgrid submission - see new combined section 4.11 Meter Change Process.</p>

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	<p><i>Metering Provider</i> must ensure that the following is undertaken before the <i>Metering Provider</i> leaves the site:</p> <p>a) Ensure that the <i>metering installation</i> is commissioned into service and that all connections are correct, tight and that the measurement system is operating correctly. Adherence to section Error! Reference source not found., Error! Reference source not found., is required; and</p> <p>b) For a site remaining a type 1, 2, 3 or 4 installation, verify that there are operational communications with the <i>metering installation</i> and that the communications are of sufficient quality to support the <i>remote acquisition</i> of <i>metering data</i>.</p> <p>4.12.3 The <i>Metering Provider</i> is required to provide to the new <i>Metering Data Provider</i> formal confirmation of the above <i>metering installation</i> details and commissioning times. Refer section 0 for meter change process performance requirements and Attachment 1 for example forms.</p>			
4.12.1 a)	<p>The <i>Metering Provider</i> must make reasonable endeavours to contact the current <i>Metering Data Provider</i> prior to undertaking any change of metering and:</p> <p>i. Provide the current Metering Data Provider with the details of the new Metering Data Provider and new Metering Provider;</p> <p>ii. Request and verify that the current Metering Data Provider undertakes a final read to recover any metering data since the meter was last interrogated; and</p>		<p>Endeavour</p> <p>a) The <u>new</u> <i>Metering Provider</i> must make reasonable endeavours to contact the current <i>Metering Data Provider</i> prior to undertaking any change of metering and:</p> <p>i. Provide the current <i>Metering Data Provider</i> with the details of the new <i>Metering Data Provider</i> and new <i>Metering Provider</i> <u>and their corresponding MSATS</u></p>	<p>AEMO, in consultation with the MSWG agreed with the Endeavour submission, see new combined section 4.11.2 a).</p>

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	<p>iii. Note the metering installation details and times on the relevant Meter Change Installation Notice or site commissioning test sheet.</p>		<p>participant ids;</p> <p>Reworded to ensure that the MSATS participant id is provided.</p>	
4.12.1 a)	<p>The <i>Metering Provider</i> must make reasonable endeavours to contact the current <i>Metering Data Provider</i> prior to undertaking any change of metering and:</p> <p>i. Provide the current <i>Metering Data Provider</i> with the details of the new <i>Metering Data Provider and new Metering Provider</i>;</p> <p>ii. Request and verify that the current Metering Data Provider undertakes a final read to recover any metering data since the meter was last interrogated; and</p> <p>iii. Note the metering installation details and times on the relevant Meter Change Installation Notice or site commissioning test sheet.</p>		<p>Acumen</p> <p>Could this clause please be modified to ensure reasonable endeavours are made to contact the metering provider during normal business hours in the location of the MDP?</p> <p>I would like to see the following added to the end of clause 4.12.1 a) after point ii): If the Meter Provider cannot contact the Metering Data Provider then reasonable endeavours should be used to ensure the meter and associated equipment is returned to the Meter Provider within 2 business days.</p> <p>This will ensure timely return of equipment to the MP so that data can be delivered into the market for settlement purposes.</p>	<p>AEMO, in consultation with the MSWG consider that there is no requirement to add the proposed text as it would be covered within the bounds of reasonable endeavours.</p> <p>AEMO note that Task 10 provides timelines for return of equipment. The timeframe for metering equipment return is not within the scope of this consultation.</p>
4.12.1 a)	<p>The <i>Metering Provider</i> must make reasonable endeavours to contact the current <i>Metering Data Provider</i> prior to undertaking any change of metering and:</p> <p>i. Provide the current <i>Metering Data Provider</i> with the details of the new <i>Metering Data Provider and new Metering Provider</i>;</p> <p>ii. Request and verify that the current Metering Data Provider undertakes a final read to recover any metering data since the meter was last interrogated; and</p>		<p>AGL</p> <p>AGL would like confirmation on what is considered 'reasonable endeavours'</p>	<p>AEMO, in response to the question from AGL provide the following: parties are usually obliged to do all that is reasonable in the circumstances to achieve the obligation, having regard to the nature, capacity, qualifications and responsibilities of the parties. The obligation does not involve going beyond the bounds of reason.</p>

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	<p>iii. Note the metering installation details and times on the relevant Meter Change Installation Notice or site commissioning test sheet.</p>			
4.13.2	<p>On completion of the <i>metering installation</i> the <i>Metering Provider</i> must ensure that the following is undertaken before the <i>Metering Provider</i> leaves the site:</p> <p>a) Ensure that the <i>metering installation</i> is commissioned into service and that all connections are correct, tight and that the measurement system is operating correctly. Adherence to section Error! Reference source not found., Error! Reference source not found., is required; and</p> <p>b) For a site remaining a type 1, 2, 3 or 4 installation, verify that there are operational communications with the <i>metering installation</i> and that the communications are of sufficient quality to support the <i>remote acquisition</i> of <i>metering data</i>.</p> <p>(deleted text)</p> <p>b) <i>The Metering Provider is required to inform the (new) Metering Data Provider of the commissioning time of the meter installation and the identity of the existing (current) Metering Data Provider. This is to facilitate the new Metering Data Provider providing the 'Meter Data Churn' to the current Metering Data Provider.</i></p>		<p>Ausgrid</p> <p>4.13.2 old b) Still required – Refer to comments against clause 4.8 (above)</p> <p>New MDP needs to know who to expect churn data from and at what time the new metering installation was commissioned.</p> <p>Clause (b) is not consistent with the heading 'Meter Change Process from Installation Types 5 or 6'.</p> <p>The new MDP still needs to know the old MDP and the commissioning date/time.</p>	<p>AEMO, in consultation with the MSWG agreed with the proposal in the Ausgrid submission. The new section 4.11.4 has been amended to include the provisions requested in the submission.</p>
14.13.2 b)	<p>b) For a site remaining a type 1, 2, 3 or 4</p>		<p>Ausnet Services</p>	<p>AEMO, in consultation with the</p>

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	<p>installation, verify that there are operational communications with the metering installation and that the communications are of sufficient quality to support the remote acquisition of metering data.</p>		<p>4.13.2 b) For a site remaining a type 1, 2, 3 or 4 installation, Verify that there are operational communications with the metering installation and that the communications are of sufficient quality to support the remote acquisition of metering data.</p> <p>Please correct drafting error</p>	<p>MSWG agreed with the proposal in the Ausnet Services submission. New section 4.11.4 has been amended to include the amendments requested in the submission.</p>
<p>4.14</p>	<p>Metering Installation Change Process (table)</p>		<p>Energex</p> <p>4.8 The FRMP Churn Procedure does not really detail how a request is made just what they must be provided with. Will MP's have an issue with this?</p> <p>4.14.1 In the table, Task ID (As in FIG 1) it states the Metering Provider must process the MSATS notification etc This notification should be also taken as a metering installation advice. Given that we agreed that the new process would be that the transfer to the FRMP would occur first to allow them to change the metering, which CR are they talking about?</p> <p>Is the new FRMP going to raise a CR to change the other roles as soon as they receive the COM notification for the transfer of FRMP role?</p> <p>In the same table in Task ID 10, should a note be made about providing the removal reads for all registers etc on the LNSP</p>	<p>AEMO – As per previous response to submission on section 4.8, alterations have been made to the section (now 4.11.1, to remove the link to the FRMP Churn Procedure and focus on the requirements that the MPB is obliged to comply with. The method for sending the request is not determined in the procedure, although the FRMP Churn Procedure does require the FRMP to notify the current RP of intent to change metering and become the RP in advance in accordance with the MSATS Procedures.</p> <p>AEMO note that he MP will only get notifications if they are selected in the role. If a CR is raised to change the FRMP only, then the new MP will not receive a notification.</p>

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			<p>required paperwork?</p> <p>Figure 1 – is this correct, because it's talking about a CR up front with Task 5 stating to obtain site information from MSATS. They won't have access to MSATS until they've hung the meter and the FRMP raises the CR to update all the roles once the meter is installed? Task 7 also relates to the CR.</p>	<p>Whether FRMP raises the CR as soon as a transfer is complete will be a business decision from that FRMP.</p> <p>Figure 1 is trying to show that there are two streams of work and maybe the legend isn't quite correct. The task 5 itself actually advises to obtain the info from the current roles not MSATS</p> <p>AEMO note that a review of figure 1 required but will be done as part of the next MPB SLP review by AEMO with the support of the MSWG</p> <p>New section 4.11.4 a) has been amended to incorporate the requirement for the collection and provision of accumulation readings for removed meters.</p>
4.14	Figure 1 Performance and Timings		<p>Jemena</p> <p>The method of notification should be reflected in tasks 3 &4 for mass market volumes following commencement of meter competition.</p>	<p>AEMO note that all procedures will need amendment and/or review upon the final determination of the AEMC current rule change process for metering competition.</p>
4.14	Figure 1 Performance and Timings		<p>Ausnet Services</p> <p>4.14.1 Regulatory obligations for Tasks 3 and 4 are unclear. Is the intention is notify</p>	<p>AEMO confirm that the requirements for notification have been clarified in the new section 4.11.</p>

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			<p>the new or current MDP and RP? If the former the words need to be clarified. If the latter the notification of metering arrangements is part of the commercial arrangement of providing a new meter. Further the example of password availability, compatibility issues no longer seem relevant.</p> <p>Please clarify the intention of the obligation and make necessary amendments</p> <p>Tasks 5 and 6 do not make it clear what information is required and from whom. Suggest the meter churn arrangements clarify what information is required by whom. Otherwise the meter churn procedures will not efficiently cater for mass market volumes and meter providers will continue to bother an otherwise unrelated LNSP with information requests.</p> <p>Meter Provider obtains (where necessary):</p> <ol style="list-style-type: none"> 1. site information from MSATS via a NMI Discovery Type 2; 2. security access information from the current Metering Provider; and 3. customer contact details from the FRMP <p>Please provide a clarify and consider suggestion</p>	

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4.14	Figure 1 Performance and Timings		<p>UE</p> <p>Fig 1 The method of notification processes in Task 3 and Task 5 should be made clear. Suggest that the meter churn arrangements which currently cater for low volume and manual processes be enhanced to cater for mass market volumes via B2B or build packs for B2M transactions. UE is not clear whether the MDP in task 3 is to the new or current MDP and the new or current RP. Also it is not clear that the B2B arrangements apply for this transaction in task 3 and whether B2B is delivered by all competitive MPBs. In task 5 the information should come from MSATS and not the LNSP/current MPB.</p> <p>The method of notification processes in Task 3 and Task 5 should be made clear.</p>	<p>AEMO confirm that the requirements for notification have been clarified in the new section 4.11.</p>
4.26	Management of Metering Installation Faults		<p>Jemena</p> <p>JEN understand metering installation malfunction is a defined term and is dedicated exclusively to the performance of metrology.</p> <p>JEN believes AEMO should consider timeliness of fault repairs of direct connected meters where the fault meter is preventing supply restoration. The majority of direct connected meters are currently provided by DNSPs and they do emergency repair/replacement of the faulty meter to restore supply.</p> <p>With meter competition in the future, there must be clear obligations for MPs to replace</p>	<p>AEMO note that although this section was not in the scope, and therefore not part of this consultation, AEMO have noted feedback to be included when AEMO next perform a full review of the MPB SLP</p>

Item	Description	Category	Participant Comments	AEMO/MSWG Comments
4.35.1	<p>The <i>Metering Provider</i> must comply with the <i>Rules</i> and all relevant procedures under the <i>Rules</i> and the current:</p> <ul style="list-style-type: none"> a) AS3000 Wiring Rules; b) ACA Communications Cabling requirements (where applicable); and c) jurisdictional and <i>Network Service Provider</i> requirements. 	<p>Procedure only</p>	<p><i>Ausnet Services</i> Suggest the following changes are made to 4.35.1, noting changes are in red:</p> <p>4.35.1 The Metering Provider must comply with the Rules and all relevant procedures under the Rules and the current:</p> <ul style="list-style-type: none"> a) AS3000 Wiring Rules; b) ACA Communications Cabling requirements (where applicable); ACMA's Cabler Provider Rules (CPRs) requirements (where applicable); and c) jurisdictional and Network Service Provider requirements. <p>ACA Communications Cabling is no longer relevant</p>	<p>AEMO note that although this section was not in the scope, and therefore not part of this consultation, AEMO have noted feedback to be included when AEMO next perform a full review of the MPB SLP.</p>