

3 November 2021.

Notice to all Registered Participants under the National Gas Rules (NGR)

This Notice is to advise Participants on AEMO's decision to approve amendments to the Retail Market Procedure (RMP (NSW/ACT)).

This Notice advises Gas Market Registered Participants that consultation under the ordinary Procedure Change Consultative Process prescribed under Rule 135EE of the NGR concluded on 11 October 2021 for:

- IN001/21 (Amend the NSW/ACT RMP allowing certain Customer-own reads (COR) to be treated as an actual read if the read satisfies certain conditions).

As required under Rule 135EE of the NGR, Gas Market Registered Participants and other interested parties were invited to submit comments to AEMO on the Impact and Implementation Report (IIR) for this proposal. AGL, Jemena Gas Networks / Evoenergy, Origin Energy, the Public Interest Advocacy Centre, and Red / Lumo Energy provided a response to the proposed changes indicating that they supported these changes.

Attachment C of this Notice sets out the consolidated feedback relating to the proposed amendments that AEMO received during this consultation phase. This attachment includes stakeholder comments, AEMO responses and, based on those responses, an indication where respondent feedback resulted in further minor amendments to the RMP (NSW/ACT) and the Customer Own Read (Actual) Methodology.

Having considered the feedback provided by each respondent, AEMO has approved the proposed amendments (Attachment A and B) of this Notice and has set the effective date for the changes to be 29 November 2021.

Updated versions of the documents mentioned in Attachment A and B will be published on the AEMO website prior to the effective date.

Should you require any further information please contact Danny McGowan on (03) 9609 8447.

ATTACHMENT A
Proposed changes: NSW/ACT Retail Market Procedures –

The NSW/ACT RMPs showing tracked changes between the current version has been attached separately to this document. Blue underline means addition and ~~red~~ strikeout means delete. Grey shade shows the changes made post the IIR version.

ATTACHMENT B
Proposed changes:- Customer Own Read (Actual) Methodology.

The Customer Own Read (Actual) Methodology has been attached separately to this document. This is a new methodology for NSW/ACT.

Grey shade shows the changes made post the IIR version

ATTACHMENT C – Responses to IIR Feedback.

Attachment C - IIR Consolidated feedback for IN001-21 (NSW/ACT RMP changes to allow some Customer Own Reads (COR) to be recognised as an actual meter reading

Section 1 - General Comments on the Impact and Implementation Report

Topic	Ref #	Company	Feedback	AEMO response
<p>Sections 1 to 8 of the IIR sets out <u><i>AEMO's critical examination of the proposal.</i></u></p> <p>Does your organisation support AEMO's examination of the proposal?</p> <p>If no, please specify areas in which your organisation disputes AEMO's examination of the proposal and include information that supports your organisation's rationale for not supporting AEMO's examination.</p>	1	AGL	<p>AGL believes that this issue has been reviewed by AEMO largely from the Network perspective.</p> <p>Noting that this may be used as a template for use in other retail markets, AGL very firmly believes that this process needs to be carefully considered with appropriate reporting mechanisms.</p>	<p>AEMO considers that both Network Operators and Retailers have had several rounds of consultation to submit feedback and raise issues and therefore that both the Network Operator and the Retailer perspectives have been considered in detail.</p> <p>Reporting by the Network Operator has been included in a new clause 3.5.4(e) of the RMP. If other jurisdictions raise an initiative to adopt a COR process, AEMO will consider the reporting mechanisms appropriate to those jurisdictions in the relevant consultations.</p>
	2	JGN and Evoenergy	JGN and Evoenergy support AEMO's examination of the proposal. The proposed changes will provide benefits to gas customers by enabling customers to provide	AEMO notes JGN and Evoenergy's support for AEMO's examination of the proposal.

			readings, particularly for chronic no-access or difficult access meters which can be used to improve the accuracy of metered energy data, network-to-retailer billing and retailer-to-customer billing, through reduced numbers of estimated readings and reduced consequent customer frustration and rework to resolve billing issues	
	3	Origin Energy	Origin recommends amended changes to the proposed procedure changes as described in section 2, to strengthen the reliability of regular actual readings provided to AEMO and participants	AEMO has responded to Origin Energy's comments in Section 2.

	4	Public Interest Advocacy Centre	<p>The Public Interest Advocacy Centre (PIAC) broadly supports AEMO's examination of the proposal and considers it a practical way of ensuring continuity of meter reads and accurate billing for gas customers during stay-at-home NSW health orders. It is also an appropriate option where the customer prefers to provide an accurate actual meter read under other circumstances of access difficulty.</p> <p>PIAC supports the proposed changes in facilitating more accurate billing for customers choosing to submit a customer own read. Customers have the right to expect accurate bills based on their actual energy usage. However, the ongoing burden of ensuring accurate energy bills must not be unreasonably placed on consumers particularly as many consumers will not be able to utilise customer own reads (either for technological, language, disability, or other reasons). The ongoing responsibility for ensuring accurate reads should rightfully remain the role of a retailer.</p> <p>We note AEMO addresses this issue within the proposed Customer own read (actual) methodology, which relies on the consumer</p>	<p>AEMO notes PIAC's support for AEMO's examination of the proposal.</p> <p>If further changes to the Customer Own Read (Actual) Methodology are to be made to expand the methods by which customers may submit their customer own read (for instance, over the phone), GRCF participants are welcome to raise an initiative for prioritisation.</p>
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			<p>initiating the arrangement by downloading and using a mobile application and provides an automatic end to a customer own read arrangement, when the customer does not submit meter readings. These measures address circumstances where a customer is unable or unwilling to provide a customer own meter read, however PIAC supports a provision for customers who are unable to access the mobile app, or provide photographs, to provide customer own reads. For instance, processes should include the option to provide a read of the meter over the phone.</p>	
	5	Red Energy and Lumo Energy	Yes.	AEMO notes Red Energy and Lumo Energy's support for AEMO's examination of the proposal.
Section 9 and 10 of the IIR set out <u><i>AEMOs recommendation and timeframes.</i></u>	6	AGL	AGL supports proceeding but notes that the issues identified in this round and the proposed wording changes provided by	AEMO notes that AGL supports proceeding with the initiative. AEMO

Does your organisation supports AEMO position to recommend the procedures changes and the timeline for those procedures change to take effective?			AGL may have a substantial impact on data voracity and customer service. AGL recognises that additional reporting has been requested, and is prepared for that to be delivered slightly later than the remaining changes, as it will have to be developed.	has responded to AGL's other concerns in Section 2.
	7	JGN and Evoenergy	JGN and Evoenergy support AEMO's recommendation and proposed timeframes for decision and effective date, on the basis of the Procedures being in alignment with business processes. The proposed timing aligns with the expiration of the AER Letter of No Action on 30 November 2021 and would facilitate a relatively seamless transition operationally from LoNA to RMP.	AEMO notes JGN and Evoenergy's support for AEMO's recommendation of the procedure changes.
	8	Origin Energy	Yes	AEMO notes Origin Energy's support for AEMO's recommendation of the procedure changes.
	9	Public Interest Advocacy Centre	PIAC supports AEMO's position to recommend the procedure changes and the proposed timeline for the procedures change to take effect.	AEMO notes PIAC's support for AEMO's recommendation of the procedure changes.
	10	Red Energy and Lumo Energy	We support the changes coming in as soon as possible	AEMO notes Red Energy and Lumo Energy's support for AEMO's recommendation of the procedure changes.

Section 2 – Comments on changes

Participants are to complete the relevant columns below in order to record their response.

Retail Market Procedures (NSW/ACT)

Ref #	Company	Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
11	JGN and Evoenergy	1.2.1 Customer Own Read	Customer-own read Propose improvement to this definition – end state of the COR(A), criteria met and validations satisfied	<i>A read of a meter undertaken by a Customer, details of which are provided by the Customer to the User or Network Operator for the delivery point to which the meter relates. For the purpose of these Procedures, except for a Customer-own read (Actual) <u>that is a validated meter reading</u>, a Customer-own read is taken to be an estimated meter reading.</i>	As with the existing definition of ‘actual meter read’ and Customer-own read (Actual), the definition of “customer-own read” does not necessarily imply validation. A Customer-own read (Actual) that is validated will be a ‘validated meter reading’ and under new clause 3.5.1(k) a Network Operator will be required to undertake an estimated meter reading if a Customer-own read (Actual) is not a validated meter reading.
12	AGL	1.2.1 Customer Own Read	The definition of a Customer Own Read does not contemplate whether that read passes any form of validation or not before it can be used. AGL understands from Jemena Gas that a CoR will only be used as a network estimate if it passes validation, which AGL supports. To ensure the voracity of that data within the network estimation and billing processes, AGL therefore suggests that the definition be expanded to clarify this matter	Suggested Drafting <i>A read of a meter <u>which passes validation</u>, undertaken by a Customer, details of which are provided by the Customer to the User or Network Operator for the delivery point to which the meter relates. <u>For the purposes of these Procedures, except for a Customer-Own read (Actual), a</u>A Customer-own read is taken to be an estimated meter reading.</i>	See Ref #11.

13	JGN and Evoenergy	1.2.1 estimated meter reading	Estimated meter reading Proposed improvements to this definition – to define 4 scenarios, including validation failure of a CoR Estimate of an actual meter reading Estimate of a COR(A) Estimate of a COR A CoR	<u>Means:</u> (a) an estimate of an actual meter reading (including an actual meter reading that is a Customer-own read (Actual)) that is made under these Procedures in accordance with an approved estimation methodology; (b) or an estimate of a Customer-own read or a Customer-own read (Actual) which is not a validated meter reading; (but in the case of a read which is a Customer-own read (Actual), only in the case where that read fails validation) that is made under these Procedures in accordance with an approved estimation methodology; or (c) <u>a Customer-own read which is a validated meter reading.</u>	See Ref #14.
14	OE	1.2.1	Recommended wording change for further definition clarity	An estimate of an actual reading (including an actual meter reading that is a Customer-own read (Actual)), that is made under these Procedures in accordance with an approved estimation methodology, or a Customer-own read (but in the case of a read which is a Customer-own read (actual), it applies in the case where that read fails validation).	AEMO has accepted the first half of the proposed change in the interests of drafting efficiency.
15	Red Energy and Lumo Energy	1.2.1 estimated meter reading	The phrase “...(including an actual meter reading that is a Customer-own read (Actual))...” is either; a. superfluous because Customer-own read (Actual) is already defined as an actual meter reading, or b.inaccurate because a Customer-own read (Actual) is only an actual meter reading after it passes validation, therefore we propose that this definition be amended to remove “...(including an actual meter reading that is a Customer-own read (Actual))...”	An estimate of an actual meter reading (including an actual meter reading that is a Customer-own read (Actual)) that is made under these Procedures in accordance with an approved estimation methodology, or a Customer-own read (but in the case of a read which is a Customer-own read (Actual), only in the case where that read fails validation).	See Ref #14.
16	AGL	1.2.1 Definition Estimated reading Customer-own read	The definition of an estimated reading should NOT include a customer provided reading which fails validation. See definition of estimated meter reading below. A read submitted by a customer which passes the following two tests I. delivered within the scheduled meter read window; and II. which passes validation; is defined as a Customer Own Read (Actual).	Drafting for Customer Own Read <i>Customer-own read</i> <i>A read of a meter undertaken by a Customer, details of which are provided by the Customer to the User or Network Operator for the delivery point to which the meter relates and which is a validated meter reading. A Customer-own read is taken to be an estimated meter reading.</i>	See Ref #11.

			<p>If the read is submitted outside the scheduled read window, it may be considered to be a Customer Own Read. But in order to be used within the Market processes it should also pass validation.</p> <p>The proposed drafting within the IIR for an estimated meter reading would require the use of customer submitted reads which fails validation to be used as an estimate by the network.</p> <p>If the customer submitted read fails validation, AGL believes that it should not be considered an estimated meter read for any network purposes (eg future estimates) or provided to the retailer.</p> <p>AGL has proposed drafting to clarify that a customer submitted read which passes validation may be considered a CoR and used within the market. If a customer submitted read fails validation, then a network estimate should be generated and used by the network and within the market and not the customer submitted read.</p>		
17	AGL	1.2.1 Definition Estimated meter Reading	<p>The clause ending the original drafting (“but in the case...”) needs to be removed otherwise it requires a customer submitted read which fails validation to be used as an estimate.</p> <p>AGL does not support a customer submitted read which fails validation being used as an estimate within the market processes.</p> <p>Note – as a Customer Own read (Actual) is defined in the procedures as being as an actual meter reading, AGL does not see the value of the additional proposed text (highlighted) in the definition.</p> <p>The additional test essentially reads as ‘an estimate of an actual meter reading including an actual meter reading that is an actual meter reading’</p>	<p>Proposed Drafting 1 – remove requirement to use a customer submitted read which fails validation as an estimate</p> <p>An estimate of an <i>actual meter reading (including an actual meter reading that is a Customer-Owned Read (Actual))</i> that is made under these Procedures in accordance with an <i>approved estimation methodology, or a Customer-own read (but in the case of a read which is a Customer-own read (actual), only in the case where that read fails validation)</i>.</p> <p>Proposed Drafting 2 to reference CoR(A)</p> <p>An estimate of an <i>actual meter reading (including an actual meter reading that is a Customer-Owned Read (Actual))</i> that is made under these Procedures in accordance with an <i>approved estimation methodology, or a Customer-own read (but in the case of a read which is a Customer-own read (actual), only in the case where that read fails validation)</i>.</p>	See Ref #14.

18	AGL	2.2(viii)(e)	<p>The AEMO drafting for the retention of information used to verify that a CoR(A) readings meets the criteria for a CoR(A) is unclear as to what information must be retained for 7 years.</p> <p>AGL would expect all such information to be available for audit purposes (in the same way as any other meter data) and that it would be possible to recreate the assessment of a submitted reading at any future date.</p> <p>AGL therefore believes that this clause needs to be more specific in the information required to be retained and the period and manner in which it is to be retained.</p>		<p>AEMO considers that clause 2.2(viii)(e) is in line with the remainder of clause 2.2(viii), i.e., the RMP as drafted treats the information used to verify that the meter reading meets the Customer-own read (Actual) criteria in the same way that it treats other metering information. Without AGL's specifying further specific information, AEMO consider the requirements are clear.</p>
The clause	OE	3.1.1 (new clause)	<p>Origin strongly recommends the inclusion of a clause that the Distributor reverts customers on customer-own read route to physical meter routes following evidence of systematic failure to provide COR (A). This can be requested and agreed between the Retailer and Distributor.</p>	<p>A Retailer may agree with the relevant Network Operator to revert to physical meter reading routes for sites that they are FRO for, where there is evidence of systematic failure by the Network Operator to provide Customer-own reads (A) in accordance with the Customer-own read (Actual) methodology.</p>	<p>AEMO considers that section 5 of the Customer-own Read (Actual) Methodology is clear when an arrangement for Customer-own Read (Actual) ends and the Network Operator must use reasonable endeavors to read a meter. If the Network Operator breaches the Customer-own Read (Actual) Methodology, then that would be handled using normal provisions for breaches of gas retail market artefacts. An additional clause is not needed to prescribe what would happen in the specific event of a breach regarding COR(A)s.</p>
20	JGN and Evoenergy	3.1.1.(f)	<p>Typographical amendments</p>	<p>2nd line "...has as an arrangement..."</p>	<p>AEMO has made the requested change.</p>
21	OE	3.1.1 (f)	<p>Origin continues to have concerns with this clause as obligations for meter readings fall on customers to provision each quarter via Jemena's gas meter mate app and removes the onus on the Distributor to visit the site and sight the meter (outside service order requests). The intent of the initiative is to empower customer to provide a self-read in instances where</p>	<p>A Network Operator is required to physically read a meter at a deliver point at least annually and not in accordance with clause 3.1.1(d) if the Network Operator has received, or arranged to receive in accordance with the Customer-own read (Actual) methodology, a Customer-own read (Actual) for that meter in accordance with that scheduled read date</p>	<p>Please see AEMO's response to Origin Energy's previous submission to the PPC in Attachment D of the IIR, Ref #17.</p>

			there have been long-term estimated – it was not to take on ownership for meter reading provision, which should be read by the Distributor at a minimum annually under this self-read scheme.	or as otherwise agreed with the Retailer who is the FRO for that delivery point.	
22	JGN and Evoenergy	3.1.1. (g) (ii)	Typographical amendments	1 st line " for the Network Operator's arrangements "	AEMO has made the requested change.
23	JGN and Evoenergy	3.5.4 (e)	Typographical amendments	2 nd line "...in its network..."	AEMO has made the requested change.
24	AGL	General Definition legal status	AGL is concerned that a number of fundamental definitions in the NSW Retail Procedures for this change are dependent on actions and activities defined in a non-procedural document, which has a lesser consultation requirement. For instance, the definition of a CoR(A) relies on the customer arrangement, the submission criteria and the two validation methodologies, all of which are described in a non-procedural document. AGL is therefore concerned that the veracity of these fundamental definitions can be amended with a much lower threshold of consultation, which in turn could lead to less acceptable outcomes for customers and the market.		No GRCF participant has raised this issue previously, despite the fact that the methodology was proposed early in the consultation. As such, AEMO does not believe that the market as a whole considers this to be a material issue. Further, as an industry approved methodology, the Customer-Own Read (Actual) Methodology is still subject to a consultation process for any changes to these definitions; as such, AEMO or JGN cannot simply unilaterally make changes to these definitions.
25	AGL	General Use of validated CoRs to update previous estimates.	The procedures are unclear as to what steps Jemena would take to update and adjust previously provided estimates when they start confirming Customer provided reads as Actuals. There is an expectation that CoR(A)s would be used to adjust previously estimated reads, but this is not clarified anywhere.		Clause 3.3.3 describes what would happen if an actual meter reading is received following an estimated meter reading. Seeing as COR(A)s are actual reads, the matters that AGL identifies are contemplated by clause 3.3.3.
Customer Own Read (COR) Actual Methodology					
26	Red Energy and Lumo Energy	1 Scope and Purpose	amend the word 'meet' to 'met'	Clause 3.1.1(g) of the Retail Market Procedures (NSW AND ACT) (RMP NSW AND ACT) states that AEMO must ensure that at all times there is a Customer-own read (Actual) methodology which specifies the criteria to be meet met for a Customer-own read...	AEMO has made the requested change.
27	Red Energy	1 Scope and Purpose	amend the word 'met' to 'meet'	(i) the criteria that a Customer-own read must met meet to be a Customer-own read (Actual), and	AEMO has made the requested change.

	and Lumo Energy				
28	Red Energy and Lumo Energy	3 Change Process	amend the sentence to read, "any amendment to this Customer-own read..." instead of; "any amendment this to Customer-own read..."	At least 20 business days prior to making any amendment this to <u>this</u> Customer-own read (Actual) methodology. AEMO must inform the Gas Retail Consultative Forum (GRCF) <u>or its successor</u> , of the change.	AEMO has made the requested changes.
29	Red Energy and Lumo Energy	5. Arrangement To Receive	<p>Between RMP 3.1.1 (f) and COR(A) Methodology 5(b) there is a circular reference without requiring a physical meter read attempt after the end of an Arrangement: If the 'Network Operator's arrangement with a Customer' ends we are referred back to clause 3.1.1(d) of the RMP NSW AND ACT which says; 'Subject to clause 3.1.1(f)...' which reads; "(f) A Network Operator is not required to read a meter at a delivery point in accordance with clause 3.1.1(d) if the Network Operator has received, or has an arrangement to receive in accordance with the Customer-own read (Actual) methodology, ..."</p> <p>To summarise; If an Arrangement ends, the Network Operator must use reasonable endeavours in accordance with clause 3.1.1(d) of the RMP, which immediately refers to 3.1.1(f) which effectively says the Network Operator is not required to read a meter if they have received or have an arrangement to receive a COR(A).</p> <p>Where is the endpoint which identifies that an Arrangement ends? The Network Operator must physically attempt to read the meter and not enter into a new Arrangement until after a (at least one) physical attempt has been made.</p>	<p><u>(b) A Network Operator's arrangement with a Customer to receive a Customer-own Read (Actual) from that Customer ends if the Customer</u></p> <hr/> <p><u>Note: If a Network Operator's arrangement with a Customer to receive a Customer-own read (Actual) ends, the Network Operator must use its reasonable endeavours to read the Customer's meter in accordance with clause 3.1.1(d) of the RMP NSW AND ACT for the next scheduled read date immediately after the arrangement ends. For the avoidance of doubt, clause 3.1.1(f) no longer applies in this circumstance until at least one physical attempt has been made.</u></p>	<p>AEMO does not believe there is a circularity between RMP 3.1.1(f) and COR(A) Methodology 5(b), seeing as the notes are not binding and are provided for advisory or illustrative purposes only. Hence, the reference to RMP clause 3.1.1(d) is not circular, since this note is merely providing the context that once the Network Operator's arrangement with a Customer to receive a Customer-own read (Actual) ends, the Network Operator must return to normal meter-reading practices. The conditions under which the arrangement ends are set out in clauses 5(b)(i), 5(b)(ii), 5(b)(iii), and 5(b)(iv).</p> <p>AEMO notes that the circularity that Red/Lumo identifies may exist between COR(A) Methodology 5(a) and 5(b). Red / Lumo's proposed amendments would, however, constitute a material change, and therefore it would need to be consulted on before being adopted. If participants believe this is an issue going into 2022, a separate initiative can be raised to address the concern.</p>

30	JGN and Evoenergy	6 (a) Criteria	Photograph details check is primarily made at the validation stage. This is to better reflect Jemena business processes that the requirements of the photograph are part of the arrangement for Customers to provide information that is true, accurate and correct. Photographs are made available to retailers through COR(A) Reports.	(a) the <i>Customer</i> has electronically submitted, directly to the <i>Network Operator</i> in accordance with the arrangement to provide a Customer-own read (Actual) , details of the <i>meter</i> number, the read undertaken by the Customer for the non-daily metered delivery point to which the meter relates and a current photograph which the Customer considers is consistent with the information submitted ; of the meter clearly showing the meter index and meter number ; and	AEMO does not accept the proposed changes. Retail market artefacts impose obligations on retail market participants, not end-customers, so it is not appropriate to have the Customer ensure the information submitted is consistent with the photograph. The requirement to verify the customer own meter readings and photographs is a requirement on JGN..
31	OE	7	An important aspect for a COR (A) reading to be classified as actual are the criteria's as specified in section 6. A current photograph must be used showing the meter index and meter number. Wording in section 7 should be replaced with 'must'.	(b) To validate a Customer-own read (Actual), the Network Operator may must use the photograph submitted by the Customer.	AEMO notes that changing "may" to "must" would constitute a material change and may well have process impacts for JGN. As such, AEMO is unable to introduce this change at the Notice of Decision stage and would have to conduct a separate consultation to effect this change.
32	JGN and Evoenergy	8. Customer own Read (Actual) Report	Typographical amendments	(d) the scheduled read date (i) read reason ('01' scheduled read or '09' not scheduled read)	AEMO has made the requested change.
33	Red Energy and Lumo Energy	8. Customer Own Read (Actual) Report	(k) photolink to the jpeg photograph provided by the Customer. Qn 1. Is the term 'photolink' intended to refer to a secure URL which provides access to the image stored by the Network Operator? Qn 2. Is it wise to define the photograph format as 'jpeg', other than to state that it must be accessible in a common, acceptable format? We think our suggested working is clearer than the undefined terms proposed by Jemena.	(k) photolink to the jpeg provide a link to the photograph of the meter provided by the Customer	AEMO has made the requested change.
34	AGL	8 Reporting	The report as specified only applies to CoR(A) reads. That is, ones which pass both the criteria specified in Clause 6 and the validation specified in clause 7.	8. CUSTOMER OWN READ (ACTUAL) REPORT. For the purpose of clause 3.5.4(e) of the RMP (NSW and ACT), the Customer-own read (Actual) Report must contain	The issues regarding COR reports that AGL has identified is independent of the scope of the current consultation, which was to align the RMP (NSW/ACT) with

			However, if the read is submitted outside the criteria, then the read is provided as a CoR, but there will be no supporting information, which will impact the reads likeliest to lead to customer complaints.	the following information for each <i>delivery point</i> with a <i>Customer-own read (Actual)</i>	the temporary process put in place by JGN and Evoenergy due to COVID-19. Hence, if AGL believes these changes to the COR reports need to be made, AGL may raise a new initiative to remedy this.
35	AGL	8 Reporting	The CoR report doesn't provide the validation information which the submitted read may pass or fail, or any information about the visual inspection of the photograph which may be used as the secondary assessment. This is particularly important for those submitted reads which fail either the criteria or validation, as these are the ones which are most likely to generate customer calls.	8. CUSTOMER OWN READ (ACTUAL) REPORT. (l) Validation method (numeric or visual) (m) validation status (pass / fail)	The issues regarding COR reports that AGL has identified is independent of the scope of the current consultation, which was to align the RMP (NSW/ACT) with the temporary process put in place by JGN and Evoenergy due to COVID-19 including reporting currently provided by JGN. Hence, if AGL believes these changes to the COR reports need to be made, AGL may raise a new initiative to remedy this.
36	AGL	8 Reporting	AGL notes AEMOs comments about aligning the reporting with that which was done for a temporary change, but submits that does not mean that permanent arrangements should not be more thorough, especially as this process may be used as a template in other markets. AGL notes that reporting has been added as CI 8. However, this reporting would only provide specific retailers with specific information relating to submitted reads which actually passed the CoR validation and criteria and became Cor(A)s. There is no information as to any reads which might fail either (or both) the validation or criteria becoming CoRs, the total population of customers using this arrangement or the total number of customers exiting this arrangement. The introduction of this process places additional ongoing workloads on all retailers, especially in handling customer complaints, therefore some assessment of this process's effectiveness in terms of overall usage, success and failure is also warranted	(n) A monthly statistical report should also be provided to the market operator and all NSW Gas Retail Market Participants providing the following information received: <ol style="list-style-type: none"> 1. The total number of readings submitted to the Network Operator per month; 2. The total number of submitted readings reading which meet the CoR(A) criteria; 3. The total number of submitted readings which pass numeric validation and the total number which fail numeric validation; 4. The total number of readings which pass visual validation; 5. The total number of customers exiting the arrangement; (o) A monthly report should be submitted to all NSW Gas Retail market participants which details for their customer base: <ol style="list-style-type: none"> 1. The total number of readings submitted to the Network Operator per month; 2. The total number of submitted readings reading which meet the CoR(A) criteria; 	AEMO notes that the report is for all Customer-own Read (Actual), which by definition is for reads that meet the Customer-own read (Actual) criteria, regardless of whether they are validated. However, the issues regarding COR reports that AGL has identified is independent of the scope of the current consultation, which was to align the RMP (NSW/ACT) with the temporary process put in place by JGN and Evoenergy due to COVID-19. Hence, if AGL believes these changes to the COR reports need to be made, AGL may raise a new initiative to remedy this.

			<p>for market assessment of the market benefits of this change as the CoR(A) is flagged as A rather than C in the meter data provided to retailers.</p>	<ol style="list-style-type: none"> 3. The total number of submitted readings which pass numeric validation and the total number which fail numeric validation; 4. The total number of readings which pass visual validation; 5. The total number of customers exiting the arrangement; 	
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