

24 August 2023



Mr Daniel Westerman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
MELBOURNE VIC 3001

Email: NEM.Retailprocedureconsultations@aemo.com.au

Dear Mr Westerman

July 2023 Retail Electricity Market Procedures Consultation

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator's (AEMO's) *July 2023 Retail Electricity Market Procedures Consultation* (the Consultation Paper).

This submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers, Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy); and
- Affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Yurika Metering.

Energy Queensland is largely supportive of the proposed changes in the consultation. However, we are concerned about the implementation date. It is very important to provide impacted stakeholders and the industry as a whole, sufficient time to enable appropriate resourcing and testing of the relevant system changes. As such, Energy Queensland prefers the later implementation date of 5 May 2025.

Our affiliated business Yurika Metering provides specific feedback to the consultation questions which are outlined in the attached response template.

Should AEMO require additional information or wish to discuss any aspect of this response, please contact Tammara Scott on 0492 137 878 or myself on 0429 394 855.

Yours sincerely,



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Acting Manager Regulation

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Encl: *Yurika Metering responses to the Consultation Paper questions*

July 2023 Retail Electricity Market Procedures Consultation

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Energy Queensland

Submission Date: 24 August 2023

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1. Context

This template is to assist stakeholders in giving feedback on the content of the initial draft version of the *July 2023 REMP Consultation*.

2. Feedback on Net System Load Profile Methodology (ICF_072) discussion

| Question | Participant Comments |
|--|---|
| <p>1. Do you agree that Option 1 best achieves the desired objectives and principles? If not, why?</p> | <p>Yurika Metering has no comments.</p> |
| <p>2. Do you believe an alternative methodology would better achieve the desired objectives and principles? Why? Please provide details of the alternative methodology.</p> <ul style="list-style-type: none"> The selection of an alternative methodology would likely result in a delay to the longer-term methodology being implemented, as AEMO would need to develop, analyse and test this alternative. | <p>Yurika Metering has no comments.</p> |
| <p>3. Do you agree that the preferred methodology should not be implemented prior to October 2024 and that with the implementation of the new methodology should occur during a historically less volatile pricing period? If not, why?</p> | <p>Yurika Metering has no comments.</p> |

3. Feedback on Substitution Type review (ICF_054) discussion

| Question | Participant Comments |
|---|--|
| 1. Do you agree that the proposed changes, to the substitution types and reason codes, will achieve the desired objective? In not, why? | Yurika Metering has no comments. |
| 2. Which of the proposed implementation dates do you believe should be pursued, and why? | Energy Queensland’s DNSPs, Ergon Energy and Energex, and Yurika Metering, strongly prefer the implementation date of 5 May 2025. There are a number of system changes already scheduled in 2024 which limits and constrains existing resources and their ability to test prior to implementation. As such, the later implementation date is preferred. |

4. Feedback on Summation Metering Changes (ICF_073) discussion

| Question | Participant Comments |
|---|--|
| 1. Do you agree with the proposed inclusion of the three summation arrangements? If not, why? | Yurika Metering agrees with the inclusion of the proposed summation metering arrangements. |
| 2. Do you believe that an alternative approach would better achieve the desired objective? | Yurika Metering are comfortable with the proposed approach based on discussions at the Electricity Retail Consultative Forum (ERCF). |
| 3. Is the summation method detailed enough or should it be more prescriptive? | Yurika Metering supports the summation method. |

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| <p>4. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.</p> | <p>Yes.</p> |
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5. Feedback on NMI Discovery for MCs discussion

| Question | Participant Comments |
|---|--|
| <p>1. Do you agree with the proposed change to the CATS Procedure? If not, why?</p> | <p>Yurika Metering considers that the Consultation Paper has not clearly identified the proposal and are unsure what the intended outcome is for the NMI Discovery access for Metering Coordinators (MC). While we note the reference to the ‘granting of limited NMI Discovery access to MCs’ in AEMOs submission to the Australian Energy Market Commission (AEMC) <i>Metering Services Regulatory Framework Review</i>¹ there has been no detail provided as to how this will be finalised in the procedure, e.g. by providing a marked-up CATS Procedures.</p> <p>Yurika Metering considers that there is a valid requirement for MCs to have the ability to conduct NMI Discovery searches to assist with timely and efficient resolution of metering activities and issues for electricity consumers.</p> |
| <p>2. Do you believe that an alternative approach would better achieve the desired objective?</p> | <p>No. There is no alternative to NMI Discovery as a tool for MCs to identify NMIs and participant Standing Data information for NMIs, where they are not the current MC.</p> |

¹ [AEMO submission](#) to AEMC Consultation *Review of the regulatory framework for metering services* (EMO0040)

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| | <p>In Yurika Metering’s experience, an incoming MC and as required under the initial proposal (ICF_005 (2018)²), there is a requirement for MCs to be capable of identifying the NMI Class as part of the engagement negotiations with Retailers or Large Customers, and where the MC is requested to self-nominate in the Responsible Person (RP) role. As self-nomination is not allowed for connection points with a NMI classified as ‘Small’, the MC needs to be able to verify the NMI Class prior to raising a market change request to nominate or appoint the MC³. NMI Discovery is the only facility where this can be achieved.</p> <p>The use of NMI Discovery would provide a simple and reliable source of information and assist MCs in resolving a number of varied metering related customer issues such as:</p> <ul style="list-style-type: none">• Identification of participants associated with a NMI they are not the MC for as part of a transposed metering investigation (e.g. at a duplex premises). In order to resolve issues of this type it can involve two or more MC's and Financially Responsible Market Participants (FRMP). The use of NMI Discovery would allow the MC associated with one of the NMIs to identify the MC and FRMP for the other NMIs (which they are not MC).• Identification or confirmation of Retailers for NMIs on multi-tenancy site. This is necessary where the replacement of the MC meter requires replacement of meter/switchboard and additional meters (of which they are not MC).• NMI Discovery search can help with the identification of Retailers as part of special projects, e.g. Government lead metering programs for social housing.• Confirming NMI details (e.g. address) as part of metering investigations where details may have been captured incorrectly or updated by DNSPs. |
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² AEMO [MSATS Procedures: CATS Procedure Principles and Obligations and Procedure for the Management of WIGS NMIs V4.6 2018](#)

³ AEMO [MSATS Procedures: CATS Procedure Principles And Obligations V5.51 2023](#)

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| | <p>It is also worth noting that prior to creating the new registered participant category of MC, both the DNSP and FRMP had the ability to perform NMI Discovery search for these purposes when previously performing the 'RP' function.</p> |
| <p>3. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.</p> | <p>Yurika Metering does not support the proposed effective date as insufficient detail has been provided.</p> <p>We do believe that there is currently a valid reason for MCs to have the ability to utilise the NMI Discovery process and would support any further activities to define and progress this matter.</p> |