

July 2023 Retail Electricity Market Procedures Consultation

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Intellihub

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
1. Do you agree that Option 1 best achieves the desired objectives and principles? If not, why?	
2. Do you believe an alternative methodology would better achieve the desired objectives and principles? Why? Please provide details of the alternative methodology. <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.	
3. Do you agree that the preferred methodology should not be implemented prior to October 2024 and that with the	

Question	Participant Comments
<p>implementation of the new methodology should occur during a historically less volatile pricing period? If not, why?</p>	

3. Feedback on Substitution Type review (ICF_054) discussion

Question	Participant Comments
<p>1. Do you agree that the proposed changes, to the substitution types and reason codes, will achieve the desired objective? In not, why?</p>	<p>In principle we agree with the proposed changes and wish to provide the following suggestions:</p> <p>We agree that type 16 should be removed and as a transitional approach it could still be used for historical purposes. We understand the term ‘historical purposes’ to be in reference to when the substitution was created, as opposed to the date of the metering data - therefore to avoid confusion, we suggest it is made clear in the procedure a type 16 cannot be created from the effective start date however a type 16 can still be sent in the NEM12 if it was created prior to the effective start date.</p> <p>With the proposed new reason code of ‘Device unmetered’ we believe that this is too generic and it would be better to have reason codes that reflects the reason for a device to be unmetered. We have considered scenarios that may lead a device to be unmetered and we believe that they covered by existing and new proposed reason codes. Therefore, unless there are scenarios that may lead to an</p>

Question	Participant Comments						
	<p>unmetered device that is not already covered by existing or new proposed reason codes, we suggest that this reason code not be introduced.</p> <p>With the proposed new reason code of 'Network by-pass' we believe that this does not provide sufficient detail to distinguish between different scenarios. We suggest that this new reason code be replaced with:</p> <table border="1" data-bbox="884 548 1734 821"> <thead> <tr> <th data-bbox="884 548 1150 618">Reason Code Description</th> <th data-bbox="1150 548 1734 618">Detailed Description</th> </tr> </thead> <tbody> <tr> <td data-bbox="884 618 1150 719">Network by-pass faulty meter</td> <td data-bbox="1150 618 1734 719">Network by passed the meter to get supply to the customer because they believe the meter is faulty</td> </tr> <tr> <td data-bbox="884 719 1150 821">Network by-pass extreme weather</td> <td data-bbox="1150 719 1734 821">Network by passed the meter to get supply to the customer because an extreme weather event has affected the meter</td> </tr> </tbody> </table>	Reason Code Description	Detailed Description	Network by-pass faulty meter	Network by passed the meter to get supply to the customer because they believe the meter is faulty	Network by-pass extreme weather	Network by passed the meter to get supply to the customer because an extreme weather event has affected the meter
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<p>2. Which of the proposed implementation dates do you believe should be pursued, and why?</p>	<p>We suggest an implementation date of 5th May 2025.</p> <p>We agree the proposed changes will provide benefits to industry however this change is a substantial change to our system and processes, and will require extensive testing and change management. We already have projects (both driven internally and externally) locked in for 2023 and 2024, therefore we believe May 2025 is a practical implementation date. We note with significant changes within the industry occurring at the moment there is a shortage of resources within industry which is increasing project cost, timeline and risks for industry. Therefore, we request AEMO consider providing a longer implementation timeframe from what is normally provided to help ease the</p>						

Question	Participant Comments
	pressure on industry, especially on changes that do not have a rules driven go-live date like this proposed change.

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?	
2. Do you believe that an alternative approach would better achieve the desired objective?	
3. Is the summation method detailed enough or should it be more prescriptive?	
4. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.	

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>We agree that an allowable scenario for the use of the MC NMI Discovery is a MC to confirm NMI Standing Data when the MC is appointed by a large customer. However, we disagree that these actions must be done within a single calendar day because in practice this is done over a few days and we do not see any reason to restrict a business process to a single calendar day.</p> <p>In addition, we also believe the MC NMI Discovery should be allowed to be used for the following scenario:</p> <ol style="list-style-type: none"> 1. A large customer is interested in appointing a MC for metering services. The MC should be allowed to perform MC NMI Discovery prior to the appointment: <ol style="list-style-type: none"> a. to confirm the information provided by the customer is correct, for example NMI provided matches the customer’s premises b. to obtain information that can help provide a quote, for example if the premises has CT <p>We believe the above are aligned with clause 7.15.5.c.1 of the NER, in the best interest of the customer and supports an effective industry process.</p> <p>We acknowledge and support AEMO’s submission to the AEMC that MCs be given more expansive rights to access NMI Standing Data. We believe the additional rights will significantly help achieve the industry goal of 100% uptake of smart meters by 2030 and manage complex issues that commonly get identified, for example managing multioccupancy sites and cross metering scenarios.</p>

Question	Participant Comments
2. Do you believe that an alternative approach would better achieve the desired objective?	We are not aware of an effective alternative.
3. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.	We agree the effective date should be the same as the final determination date for this consultation.