

# July 2023 Retail Electricity Market Procedures Consultation

## FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Vector Metering

***Submission Date:*** 23/08/2023

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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>N/A – Not impacted</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"> <li>• 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.</li> </ul>	<p>N/A – Not impacted</p>
<p>3. Do you agree that the preferred methodology should not be implemented prior to October 2024 and that with the</p>	<p>N/A – Not impacted</p>

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

### 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?	Broadly agree however question the new reason code of 'Customer by-pass'. Customers cannot by-pass meters. If this is the reason why a sub is generated then the existing codes of '60 – Illegal' or '61 - Equipment tampered' appear to be adequate.
2. Which of the proposed implementation dates do you believe should be pursued, and why?	November 2024 – the proposed changes provide some additional flexibility for MDP's in managing substitutions.

### 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?	N/A – Not impacted

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

## 5. Feedback on NMI Discovery for MCs discussion

Question	Participant Comments
1. Do you agree with the proposed change to the CATS Procedure? If not, why?	<p>We support the proposed changes to remove the conflict between the NER and the CATS Procedure</p> <p>We also alert AEMO to the existence of a number of other legitimate Use Cases where MC’s should be allowed to perform NMI discovery. Current restrictions on ND for MC’s present barriers to the industry working effectively impacting customers and market participants from efficiently meeting their obligations. Typical Use Cases are:</p> <ul style="list-style-type: none"> <li>• Cross meter situations where MC needs to determine which other parties are impacted so that appropriate steps can be taken.</li> </ul>

Question	Participant Comments
	<ul style="list-style-type: none"> <li>• Assisting customers and customer REC's at multioccupancy sites where multi meter works is required to determine impacted NMI's and their associated retailers, so that appropriate steps can be taken.</li> <li>• Identifying causes of failed metering work due to incorrect standing data in MSATS (usually addresses or meter numbers)</li> <li>• Identifying NMI's that are still active in the market but have new NMI's created in their place. These cause repeated site visits searching for a meter that has been removed.</li> </ul> <p>The recent removal for ND for MC's creates a barrier to solving the above issues that in many cases impact customers and results in reputational damage for the industry.</p>
<p>2. Do you believe that an alternative approach would better achieve the desired objective?</p>	<p>N/A</p>
<p>3. Do you agree with the proposed effective date? If not, please provide an alternative effective date with reasoning.</p>	<p>Yes.</p>