

## Appendix A. List of Submissions and AEMO Responses

**Table 1 Meter Data File Format Specification NEM12 & NEM13**

No.	Section	Description	Stakeholder	Participant Comments
1	Appendix E. Reason codes	Addition of Incorrect Meter Multiplier	AGL	AGL supports these changes
1	Appendix E. Reason codes	Addition of Incorrect Meter Multiplier	Origin Energy	No comments
1	Appendix E. Reason codes	Addition of Incorrect Meter Multiplier	Red Energy and Lumo Energy	Red Energy & Lumo Energy (Red & Lumo) agree with this addition.
2	Appendix E. Reason codes	Addition of Temporarily Connection Point unmetered	AGL	AGL supports these changes
2	Appendix E. Reason codes	Addition of Temporarily Connection Point unmetered	Origin Energy	No comments
2	Appendix E. Reason codes	Addition of Temporarily Connection Point unmetered	Red Energy and Lumo Energy	Red & Lumo agree with this addition.
3	Appendix E. Reason codes	Addition of Customer By-Pass	AGL	AGL supports these changes
3	Appendix E. Reason codes	Addition of Customer By-Pass	Origin Energy	No comments
3	Appendix E. Reason codes	Addition of Customer By-Pass	Red Energy and Lumo Energy	Red & Lumo agree with this addition. Further to this Origin Energy notes that customers are unable to bypass their meter. Red & Lumo regularly see instances where a customer has illegally bypassed the meter and this code would be appropriate in those instances.
3	Appendix E. Reason codes	Addition of Network By-Pass	SA Power Networks	SAPN would like to understand how the MDPs would be able to accurately determine this as the reason.
4	Appendix E. Reason codes	Addition of Network By-Pass	AGL	AGL supports these changes
4	Appendix E. Reason codes	Addition of Network By-Pass	Origin Energy	No comments
4	Appendix E. Reason codes	Addition of Network By-Pass	Red Energy and Lumo Energy	Red & Lumo agree with this addition. However, given the recent addition of "Network by-pass – Extreme Weather", we suggest the description be updated to reflect this and the Detailed Description stating fault. We suggest

No.	Section	Description	Stakeholder	Participant Comments
				the updated description to be "Network By-Pass Meter Fault"
5	Appendix E. Reason codes	Addition of Transposed Channel	AGL	AGL supports these changes
5	Appendix E. Reason codes	Addition of Transposed Channel	Origin Energy	No comments
5	Appendix E. Reason codes	Addition of Transposed Channel	PLUS ES	Transposed codes would rarely get used. Typically the configurations are corrected, and Actual Data is republished.  As there is no visibility to the qualification/impact of this requirement it is difficult to support this reason code.
5	Appendix E. Reason codes	Addition of Transposed Channel	Red Energy and Lumo Energy	Red & Lumo agree with this addition.
6	Appendix E. Reason codes	Addition of Transposed Channel - UoM Correction	AGL	AGL supports these changes
6	Appendix E. Reason codes	Addition of Transposed Channel - UoM Correction	Origin Energy	No comments
6	Appendix E. Reason codes	Addition of Transposed Channel - UoM Correction	PLUS ES	Transposed codes would rarely get used. Typically the configurations are corrected, and Actual Data is republished.  As there is no visibility to the qualification/impact of this requirement it is difficult to support this reason
6	Appendix E. Reason codes	Addition of Transposed Channel - UoM Correction	Red Energy and Lumo Energy	Red & Lumo agree with this addition.
7	Appendix E. Reason codes	Addition of Transposed Channel – Reverse Polarity	AGL	AGL supports these changes
7	Appendix E. Reason codes	Addition of Transposed Channel – Reverse Polarity	Origin Energy	No comments
7	Appendix E. Reason codes	Addition of Transposed Channel – Reverse Polarity	PLUS ES	Transposed codes would rarely get used. Typically the configurations are corrected, and Actual Data is republished.  As there is no visibility to the qualification/impact of this requirement it is difficult to support this reason
7	Appendix E. Reason codes	Addition of Transposed Channel – Reverse Polarity	Red Energy and Lumo Energy	Red & Lumo agree with this addition.
8	Appendix E. Reason codes	Addition of Transposed Meter	AGL	AGL supports these changes

No.	Section	Description	Stakeholder	Participant Comments
8	Appendix E. Reason codes	Addition of Transposed Meter	Origin Energy	No comments
8	Appendix E. Reason codes	Addition of Transposed Meter	Red Energy and Lumo Energy	Red & Lumo agree with this addition.
9	Appendix E. Reason codes	Addition of Network by-pass extreme weather	AGL	AGL supports these changes
9	Appendix E. Reason codes	Addition of Network by-pass extreme weather	Origin Energy	No comments
9	Appendix E. Reason codes	Addition of Network by-pass extreme weather	PLUS ES	<p>PLUS ES does not support this code as it is duplicating another proposed reason code/redundant.</p> <ul style="list-style-type: none"> <li>• Network Bypass is already proposed as a reason code</li> <li>• There is an existing reason code 3 – extreme weather conditions</li> </ul>
9	Appendix E. Reason codes	Addition of Network by-pass extreme weather	Red Energy and Lumo Energy	Red & Lumo agree with this addition.
9	Appendix E. Reason codes	Addition of Network by-pass extreme weather	SA Power Networks	SAPN would like to understand how the MDPs would be able to accurately determine this as the reason.
10	Appendix E. Reason codes	Addition of Defined load method	AGL	AGL supports these changes
10	Appendix E. Reason codes	Addition of Defined load method	Intellihub	<p>The description does not read well. We suggest adding the word 'provides' as suggested below:</p> <p>For use where Retailer/LNSP provides profile data based on off-market meter or other measured data that best represents the connection point load.</p>
10	Appendix E. Reason codes	Addition of Defined load method	Origin Energy	No comments
10	Appendix E. Reason codes	Addition of Defined load method	PLUS ES	<p>PLUS ES does not support this enumeration as it is a methodology ('method code') rather than a reason code.</p> <p>Type 18 – substitution allows you to substitute with agreement. If we then use the methodology as a reason code, we lose sight of why the data has been amended. i.e. extreme weather, quarantined premises etc.</p>
10	Appendix E. Reason codes	Addition of Defined load method	Red Energy and Lumo Energy	Red & Lumo agree with this addition.

No.	Section	Description	Stakeholder	Participant Comments
11	3.3.5	Reason Code	Intellihub	<p>With more reason codes added it should be made clear that there is no obligation on the MDP to create a new version of metering data, with the same consumption and profile as the current version of metering data, just to update the reason code.</p> <p>We suggest updating clause of 3.3.5.a as follow:</p> <p>The MDP must apply the ReasonCode that most accurately reflects the reason for supplying the code or based on the hierarchical structure agreed with the FRMP at the time the metering data was substituted. For avoidance of any doubt, there is no obligation on the MDP to create a new version of metering data just to update the ReasonCode.</p>

Table 2 Metrology Procedure Part A

No.	Section	Description	Stakeholder	Participant Comments
1	5.2 New Metering Installation Summation Arrangements	Addition of new section	AGL	AGL supports these changes
1	5.2 New Metering Installation Summation Arrangements	Addition of new section	Origin Energy	No comments
1	5.2 New Metering Installation Summation Arrangements	Addition of new section	PLUS ES	<p>Whilst PLUS ES has not currently identified additional scenarios, it does not preclude their eventuation. For this purpose the allowed summation metering arrangements are better described in terms of objectives and conditions that must be met, so that it can accommodate variations of circumstances. If it is, instead, limited to explicit examples (as presently written), it will cause future compliance problems when these variations arise that meet the objective, but were not included on the original list of explicit</p>



No.	Section	Description	Stakeholder	Participant Comments
				<p>examples. The following alternative is for consideration:</p> <p>5.2 could be re-written as follows:</p> <p>Summation metering is only permitted for single connection point circumstances where a physical restriction prevents the installation of single current transformers over all conductors of each phase.</p> <p>Any proposed summation metering arrangement must be approved by AEMO before implementation.</p> <p>Examples of circumstances considered for summation metering may include HV breaker-and-a-half schemes, HV single transformer fed by multiple paralleled cables, and cross boundary supplies with multiple LV secondary circuits.</p>
1	5.2 New Metering Installation Summation Arrangements	Addition of new section	Red Energy and Lumo Energy	Red & Lumo note the marked draft v751 was incorrectly numbered and was adding a section 5 and renumbering the following sections. Summation metering was already included in the Metrology Part A as section 5. Red & Lumo have no further feedback.
2	2.3 Summation Method	Addition of new section	AGL	AGL supports these changes
2	2.3 Summation Method	Addition of new section	Origin Energy	No comments
2	2.3 Summation Method	Addition of new section	PLUS ES	While the paralleling CT method is approved, it should be (a) documented with the obligations to be designed to meet the accuracy performance requirements of the Rules and (b) alternative methods of summation should not be precluded because they may be demonstrated to be equivalent or superior to existing methods. Moreover, there is already protection against the installation of non-compliant summation systems due to



No.	Section	Description	Stakeholder	Participant Comments
				<p>the requirement for AEMO to approve <b>all</b> new summation systems prior to installation.</p> <p>An improvement is also suggested in the wording for the termination of secondary conductors.</p> <p>5.3 should be modified as follows:</p> <p>These provisions detail the summation method that can be used for new summation metering installations described in 5.2.</p> <p>Summation metering <b>is can be</b> achieved by paralleling CT secondary circuits, <b>so long as</b> the overall metering installation meets the minimum standards and overall error <b>performance requirements</b> for a new metering installation under all load combinations of the individual CT secondary circuits conditions for the connection point and its individual conductors as measured by individual CTs.</p> <p>CT secondary circuits can only be paralleled using appropriate arrangements of links <b>terminating individual conductors</b>; this must not be done at the meter terminals.</p> <p><b>The use of additional summation CTs within the metering installation is not permitted.</b></p>
2	2.3 Summation Method	Addition of new section	Red Energy and Lumo Energy	<p>Red and Lumo note this response template document to be incorrect as it lists this section as 2.3, when it is in fact 5.3 Summation Method, we do note however the marked draft v751 has been added correctly. Red &amp; Lumo have no further feedback.</p>
3	5.1 Legacy Summation Arrangements		PLUS ES	<p>Suggested addition to the text to ensure that conductors are not doubled-up, whether that would be</p>

No.	Section	Description	Stakeholder	Participant Comments
				terminals in a marshalling box or in the terminals of a meter. The purpose of this is to allow access to individual instrument transformers for testing, without disturbing the integrity of any part of the secondary circuit.

Table 3 Metrology Procedure Part B

No.	Section	Description	Stakeholder	Participant Comments
1	2.6 Summary table of Substitution	Edited to include: <ul style="list-style-type: none"> <li>• Rewording of type 14, type 15 and type 20</li> <li>• Obsolescence of type 16</li> <li>• Addition of new substitution types 22,23,24,25.</li> </ul>	AGL	AGL supports these changes
1	2.6 Summary table of Substitution	Edited to include: <ul style="list-style-type: none"> <li>• Rewording of type 14, type 15 and type 20</li> <li>• Obsolescence of type 16</li> <li>• Addition of new substitution types 22,23,24,25.</li> </ul>	Origin Energy	Origin acknowledges the decision proposed by the ERCF sub-group based on our previous submission and has no further feedback on this change.
1	2.6 Summary table of Substitution	Edited to include: <ul style="list-style-type: none"> <li>• Rewording of type 14, type 15 and type 20</li> <li>• Obsolescence of type 16</li> <li>• Addition of new substitution types 22,23,24,25.</li> </ul>	Red Energy and Lumo Energy	Red & Lumo agree with these changes.
2	3.2 Substitution types	Edit of substitution types in (f) Addition of (g) (i) and (ii)	AGL	AGL supports these changes
2	3.2 Substitution types	Edit of substitution types in (f) Addition of (g) (i) and (ii)	Intellihub	We note the words 'MDPs may change the quality flag to an existing type 16 or 18 Substitution without seeking further agreement from those parties' has been removed from clause 3.2.g. We suggest that this be re-instated without reference to type 16 because once agreement is obtained then subsequently changing the quality flag should not require the manual process of seeking agreement again.

No.	Section	Description	Stakeholder	Participant Comments
				<p>We suggest adding an additional sentence to the end of clause 3.2.g.ii as follow:</p> <p>For Type 18, the party initiating a change in metering data must consult with the MDP and use reasonable endeavours to reach an agreement with the affected FRMP(s), ENLR (where appropriate) and the LNSP for the connection point. Should the affected participants not respond within 2 business days, then the proposal will be taken as accepted until further communication is undertaken. MDPs may change the quality flag to an existing type 18 Substitution without seeking further agreement.</p>
2	3.2 Substitution types	Edit of substitution types in (f) Addition of (g) (i) and (ii)	Origin Energy	No comments
2	3.2 Substitution types	Edit of substitution types in (f) Addition of (g) (i) and (ii)	Red Energy and Lumo Energy	Red & Lumo agree with the change and additions.
3	3.3.4 Type 14 – Like Day	Rewording to Type 14 – Retrospective Like Day	AGL	AGL supports these changes
3	3.3.4 Type 14 – Like Day	Rewording to Type 14 – Retrospective Like Day	Origin Energy	No comments
3	3.3.4 Type 14 – Like Day	Rewording to Type 14 – Retrospective Like Day	Red Energy and Lumo Energy	Red & Lumo agree with this rewording.
4	3.3.5 Type 15 – Average Like Day	Reworded to Type 15 – Retrospective Average Like Day	AGL	AGL supports these changes
4	3.3.5 Type 15 – Average Like Day	Reworded to Type 15 – Retrospective Average Like Day	Origin Energy	No comments
4	3.3.5 Type 15 – Average Like Day	Reworded to Type 15 – Retrospective Average Like Day	Red Energy and Lumo Energy	Red & Lumo agree with this rewording.
5	3.3.6 Type 16 – Agreed Method	Reworded to obsolete Type 16 – Agreed Method	AGL	AGL supports these changes
5	3.3.6 Type 16 – Agreed Method	Reworded to obsolete Type 16 – Agreed Method	Origin Energy	No comments
5	3.3.6 Type 16 – Agreed Method	Reworded to obsolete Type 16 – Agreed Method	Red Energy and Lumo Energy	Red & Lumo agree with making “Type 16 agreed method” obsolete.



No.	Section	Description	Stakeholder	Participant Comments
6	3.3.8 Type 18 – Alternative	Reference for 3.2 (g)(ii) added Addition of (d)	AGL	AGL supports these changes
6	3.3.8 Type 18 – Alternative	Reference for 3.2 (g)(ii) added Addition of (d)	Origin Energy	No comments
6	3.3.8 Type 18 – Alternative	Reference for 3.2 (g)(ii) added Addition of (d)	Red Energy and Lumo Energy	Red & Lumo agree the additions.
7	3.3.10 Type 20 – Churn Correction	Rewording to Type 20 – Propsective Like Day Use definition edited	AGL	AGL supports these changes
7	3.3.10 Type 20 – Churn Correction	Rewording to Type 20 – Propsective Like Day Use definition edited	IntelliHub	Table 3 is referenced by Type 20 and Type 23, with Type 20 now allowing for scenarios that is not related to a meter churn and Type 23 also allowing for scenarios that is not related to a meter churn. However, table 3 still describes the approach using the term 'Churn Day'. For avoidance of confusion, we suggest the term 'Churn Day' in table 3 be replaced with 'Substitution Day' (similar to the approach described in table 1).
7	3.3.10 Type 20 – Churn Correction	Rewording to Type 20 – Propsective Like Day Use definition edited	Origin Energy	No comments
7	3.3.10 Type 20 – Churn Correction	Rewording to Type 20 – Propsective Like Day Use definition edited	Red Energy and Lumo Energy	Red & Lumo agree with this rewording.
8	3.3.12 Type 22 – Prospective Average Like Day	New Substitution definition added Addition of table 4	AGL	AGL supports these changes
8	3.3.12 Type 22 – Prospective Average Like Day	New Substitution definition added Addition of table 4	Origin Energy	No comments
8	3.3.12 Type 22 – Prospective Average Like Day	New Substitution definition added Addition of table 4	Red Energy and Lumo Energy	Red & Lumo agree with the additions.
9	3.3.13 Type 23 – Previous Year	New Substitution definition added	AGL	AGL supports these changes
9	3.3.13 Type 23 – Previous Year	New Substitution definition added	Origin Energy	No comments

No.	Section	Description	Stakeholder	Participant Comments
9	3.3.13 Type 23 – Previous Year	New Substitution definition added	Red Energy and Lumo Energy	Red & Lumo agree with the additions.
10	3.3.14 Type 24 – Data Scaling	New Substitution definition added	AGL	AGL supports these changes
10	3.3.14 Type 24 – Data Scaling	New Substitution definition added	Origin Energy	No comments
10	3.3.14 Type 24 – Data Scaling	New Substitution definition added	Red Energy and Lumo Energy	Red & Lumo agree with the additions.
11	3.3.15 Type 25 - ADL	New Substitution definition added	AGL	AGL supports these changes
11	3.3.15 Type 25 - ADL	New Substitution definition added	Intellihub	<p>We note this substitution type has a criterion of 'Where no other option is available' which suggests that this option should only be used where other options have been exhausted. We believe this criterion should be removed and instead allow the MDP to determine when this substitution type should be used. For example, an ADL based on the customer's profile (type 25) may be better than the previous year data (type 23) if the customer recently installed solar. Given the FRMP or LNSP may request the MDP to change the substitution if it is not appropriate then we believe it is in the MDP's interest to choose the most appropriate substitution type the first time. Leaving the criterion as is for type 25 would restrict the MDP from choosing the most appropriate substitution type.</p> <p>We suggest the description for type 25 be updated to:</p> <p>To perform a type 25 Substitution, the substituted period is calculated based on Average Daily Load which may or may not be profiled.</p>
11	3.3.15 Type 25 - ADL	New Substitution definition added	Origin Energy	No comments
11	3.3.15 Type 25 - ADL	New Substitution definition added	Red Energy and Lumo Energy	Red & Lumo agree with the additions.
12	11.2.1 NSW	Reference amended to 12.9.2	AGL	AGL supports these changes
12	11.2.1 NSW	Reference amended to 12.9.2	Origin Energy	Origin supports the proposed change

No.	Section	Description	Stakeholder	Participant Comments
12	11.2.1 NSW	Reference amended to 12.9.2	Red Energy and Lumo Energy	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2.
15	11.2.2 Queensland	Reference amended to 12.9.2	AGL	AGL supports these changes
15	11.2.2 Queensland	Reference amended to 12.9.2	Origin Energy	Origin supports the proposed change
15	11.2.2 Queensland	Reference amended to 12.9.2	Red Energy and Lumo Energy	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2.
16	11.2.3 South Australia	Reference amended to 12.9.2	AGL	AGL supports these changes
16	11.2.3 South Australia	Reference amended to 12.9.2	Origin Energy	Origin supports the proposed change
16	11.2.3 South Australia	Reference amended to 12.9.2	Red Energy and Lumo Energy	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2.
17	11.3.1 NSW & Queensland	Reference amended to 12.9.2	AGL	AGL supports these changes
17	11.3.1 NSW & Queensland	Reference amended to 12.9.2	Origin Energy	Origin supports the proposed change
17	11.3.1 NSW & Queensland	Reference amended to 12.9.2	Red Energy and Lumo Energy	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2.
18	11.3.2 South Australia	Reference amended to 12.9.2	AGL	AGL supports these changes
18	11.3.2 South Australia	Reference amended to 12.9.2	Origin Energy	Origin supports the proposed change
18	11.3.2 South Australia	Reference amended to 12.9.2	Red Energy and Lumo Energy	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2.
19	11.4.1 Net System Load Profile	Reference amended to 12.9.2	AGL	AGL supports these changes
19	11.4.1 Net System Load Profile	Reference amended to 12.9.2	Origin Energy	Origin supports the proposed change
19	11.4.1 Net System Load Profile	Reference amended to 12.9.2	Red Energy and Lumo Energy	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2.
20	11.4.2 Floor Value	Addition of new section in respect to the NSLP	AGL	AGL supports these changes
20	11.4.2 Floor Value	Addition of new section in respect to the NSLP	Origin Energy	Origin supports the proposed change
20	11.4.2 Floor Value	Addition of new section in respect to the NSLP	Red Energy and Lumo Energy	Red & Lumo agree with the additions.

No.	Section	Description	Stakeholder	Participant Comments
21	11.4.3 NSLP TI values below floor value	Addition of new section in respect to the NSLP	AGL	AGL supports these changes
21	11.4.3 NSLP TI values below floor value	Addition of new section in respect to the NSLP	Origin Energy	Origin supports the proposed change
21	11.4.3 NSLP TI values below floor value	Addition of new section in respect to the NSLP	Red Energy and Lumo Energy	Red & Lumo agree with the additions.
22	11.5 Accumulation Meter Profiler – Net System Load Profile	Amended of reference to 12.9.2 in (a)	AGL	AGL supports these changes
22	11.5 Accumulation Meter Profiler – Net System Load Profile	Amended of reference to 12.9.2 in (a)	Origin Energy	Origin supports the proposed change
22	11.5 Accumulation Meter Profiler – Net System Load Profile	Amended of reference to 12.9.2 in (a)	Red Energy and Lumo Energy	Red & Lumo note currently Part B references the incorrect section of Part A and needs to be updated to 12.9.2. We also agree to the updated wording to include a reference to 11.4

**Table 4 MSATS Procedures: CATS Procedure principles and Obligations**

No.	Section	Description	Stakeholder	Participant Comments
1	16.2 Participant	Removal of (h)	AGL	AGL supports these changes
1	16.2 Participant	Removal of (h)	Intellihub	<p>We are disappointed with the proposal to remove the MC NMI Discovery unless we are the current or previous MC for the NMI because this hinders our ability to operate effectively when providing services to customers and retailers.</p> <p>We note AEMO’s decision for the draft determination is based on aligning the MSATS Procedure with the Rules which we do understand although it is not the outcome that best support customers and the industry.</p> <p>We also note AEMO agrees that there are valid use cases where NMI Discovery should be provided to a MC who is not the current or previous MC</p>

No.	Section	Description	Stakeholder	Participant Comments
				for the NMI and have made submissions to the AEMC to allow for this. We encourage AEMO to further engage with the AEMC to highlight the industry issue and to advocate providing expanded NMI Discovery access to the MC.
1	16.2 Participant	Removal of (h)	Origin Energy	No comments
1	16.2 Participant	Removal of (h)	Red Energy and Lumo Energy	Red & Lumo agree to the removal.
2	16.2 Participant	Rewording of (i) Removal of (i) (ii)	AGL	AGL supports these changes
2	16.2 Participant	Rewording of (i) Removal of (i) (ii)	Origin Energy	No comments
2	16.2 Participant	Rewording of (i) Removal of (i) (ii)	Red Energy and Lumo Energy	Red & Lumo agree to the rewording and the removal. However, note the marked-up changes are not correctly marked up.
3	16.2 Participant	Rewording of (g) (ii)	Intellihub	We understand that clause 7.15.5 of the NER allows the current MC and previous MC access to NMI stand data. Therefore we suggest clause 16.2.g.ii be updated to include the previous MC, we suggest the following wording:  An MC must only carry out an MC Standing Data Search on NMIs where they are the Current MC or the Previous MC.

**Table 5 Service Level Procedure Embedded Network Manager Service**

No.	Section	Description	Stakeholder	Participant Comments
1	4.2.1 Overview	Removal of (f)	AGL	AGL understands the need for this change, but also appreciates the issue which impacts the ENM and supports a change which enables the ENM to manage changes to the parent NMI which impact the child NMIs.
1	4.2.1 Overview	Removal of (f)	Origin Energy	No comments
1	4.2.1 Overview	Removal of (f)	PLUS ES	Aligned with the provisions of NER 7.15.5(c)(6) - that an ENM may access NMI Standing Data at a child connection point, not a parent connection point, PLUS ES recommends that the ENM obligations of clause 4.1 (d) NMI Allocation (ENM SLP) are updated and the sub clauses which the ENM cannot fulfill compliantly are

No.	Section	Description	Stakeholder	Participant Comments
				<p>removed. That is, assigning TNI, DLF etc., if they are not entitled to access the information, the how they access it is irrelevant, and hence they should not be required to populate it.</p> <p>(d) Create the Child NMI in MSATS using Create NMI Change Request 2020, 2021, 2520, or 2521. When creating the Child NMI the ENM must:</p> <ul style="list-style-type: none"> <li>(i) Assign the TNI Code<sup>2</sup> of the Parent NMI to the Child NMI;</li> <li>(ii) Link the Child NMI to the Parent NMI by assigning the same Embedded Network Code of the Parent NMI to the Child NMI in the "Child Name" field; and</li> <li>(iii) Assign the appropriate DLF Code to the Child NMI.</li> </ul> <p>Additionally, a review and update of obligations is required with respect to the CATS procedures, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Clause 4.12 (e) and (f) – Provisioning of Parent NMI</li> <li>• Clause 9.2.4(c) – Provisioning of parent NMI fields as a 'must' in CRs</li> <li>• Clause 9.2.4 (c) – Provisioning of parent NMI fields as a 'must' in CRs</li> <li>• Clause 12.2.5 (b) - Provisioning of parent NMI fields as a 'must' in CRs</li> </ul>
1	4.2.1 Overview	Removal of (f)	Red Energy and Lumo Energy	Red & Lumo agree to the removal.

**Table 6 Additional Feedback**

No.	Participant Comments	Stakeholder
1	No further comments	Origin Energy
1	AGL has no further feedback at this time.	AGL
1	<p>With regards to the effective start date for ICF_054 (substitution and reason code changes), AEMO acknowledged that 5 participants supported November 2024 and 4 participants supported May 2025 due to '...the volume of system changes already scheduled for 2024 and associated resourcing constraints'. AEMO then considered an effective start date of 4 November 2024 would result in several changes to Participant obligations in quick succession and in the end stated that 'AEMO agrees with most respondents that the effective date should be 29 September 2024'.</p> <p>While we acknowledge that deciding on the effective start date based on the number of respondents supporting a particular date is a simply quantitative approach, we believe this approach does not consider or address the concerns raised about the volume of system changes already scheduled for 2024 and associated resourcing constraints. We request AEMO reconsiders the effective start date and take into account the impact on participants, for example Energy Queensland, who strongly prefer May 2025 due to resourcing constraints, is considered as one respondent however this respondent represents three participants (Ergon Energy, Energex and Yurika Metering). Another consideration is the participant type, for example this change will impact on MDPs more than other participants therefore feedback from MDPs should be given more weighting.</p>	Intellihub

No.	Participant Comments	Stakeholder
	We believe that May 2025 is a reasonable date, given it was put forward as an option, and this date addresses the concerns of the volume of system changes already scheduled for 2024 and associated resourcing constraints.	
1	<b>Access data rights</b> – PLUS ES recognises the constraints the Rules present from a compliance perspective. Resolution/remediation of BAU tasks which require access to information no longer available, have ceased, in the absence of alternative compliant mechanisms, resulting in poor customer outcomes. Whilst a rule change is an evident requirement, it does not appear to be an achievable outcome within the near future.	PLUS ES
1	<b>Section 5 – Other matters</b> – Participation in the ERCF Substitution Type Review subgroup was restricted. Qualification against each proposed reason code should have been provided in the Draft Determination to allow industry to make an informed decision and deliver an efficient review.	PLUS ES
1	<p>Per the comments above regarding the MSATS Procedures: CATS Procedure Principles and Obligations and not being correctly marked up. Please see below for the correct markups commencing at 16.2.(g)</p> <p>(g) When initiating NMI Discovery Search 3, a retailer must ensure:</p> <ul style="list-style-type: none"> <li>(i) When using the reason code of TRI (Transferred In Error), they are the Current FRMP or the most recent previous FRMP for a given NMI. (This applies where the Current FRMP needs to request a retailer to transfer back a NMI transferred in error or the most recent previous FRMP has identified another retailer has transferred the NMI in error and is seeking to transfer it back.)</li> <li>(ii) When using the reason code of NNS (New NMI Setup Error – see Table 16-B), the NMI was created in the past 130 business days from the NMI Discovery Search 3 date.</li> </ul> <p><del>(h) An MC may seek access to NMI Standing Data from MSATS in accordance with section 16.3.5 only for the purpose of identifying the NMI Classification of 'LARGE' in order to arrange a change of MC.</del></p> <p><del>(i)(h) An current or prospective MC must:</del></p> <ul style="list-style-type: none"> <li><del>(i) only carry out an MC Standing Data Search on NMIs where they are the Current MC.; or</del></li> <li><del>(ii) only perform MC Standing Data Search activity for the purpose of responding to a request from a large customer/retailer to assist in the appointment of the prospective MC.</del></li> </ul> <p><del>(j)(i) The LNSP must:</del></p> <ul style="list-style-type: none"> <li><del>(i) Only carry out a NMI Discovery Search 1 on any NMIs where they are the Current LNSP.</del></li> <li><del>(ii) Only perform NMI Discovery Search 1 within its local area for the purpose of responding to a request from a retailer to assist in the resolution of a NMI Standing Data problem, or to perform quality checks of its data within MSATS.</del></li> <li><del>(iii) Only carry out a NMI Discovery Search 2 on any NMIs where they are the Current LNSP.</del></li> <li><del>(iv) Only perform NMI Discovery Search 2 activity within its local area for the purpose of responding to a request from a retailer to assist in the resolution of a NMI Standing Data problem, or to perform quality checks of its data within MSATS.</del></li> </ul> <p><del>(k)(i) The ENM must only carry out a:</del></p> <ul style="list-style-type: none"> <li><del>(i) NMI Discovery Search 1 on any NMIs where they are the Current ENM.</del></li> <li><del>(ii) NMI Discovery Search 2 on any NMIs where they are the Current ENM.</del></li> </ul>	Red Energy and Lumo Energy
1	SAPN is concerned that the additional reason codes will require new process for the LNSP to support the MDP in determining when to apply some of these reason codes as highlighted in section 2 above. Should additional work is required for the LNSP to support the MDP in determining the use of these new reason codes, then Cost and Benefit Analysis should be carried out demonstrating sufficient benefits can be provided to the customer to support the creation of any additional work load, effort and cost.	SA Power Networks

