

Metering Installation Exemption Automation

Final Report – Standard Consultation
for the National Electricity Market

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New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia

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Executive summary

The publication of this final report (**Final Report**) concludes the standard consultation procedure conducted by AEMO (**Consultation**) under clause 8.9.2 of the National Electricity Rules (**NER**) on the changes (**Changes**) which are proposed (**Proposal**) to the following Retail Electricity Market Procedures (**Procedures**) to implement the automated solution (**Automation**) for the process (**Process**) to submit an application (**Application**) for a metering installation exemption (**Exemption**):

- Exemption Procedure – Metering Installation Malfunctions, made under NER 7.8.10(b) (**Procedure**).
- Exemption Guideline for Small Customers, made under NER 7.8.3(a) (**Guideline**).
- Retail Electricity Market Procedures – Glossary and Framework.

AEMO proposed the following matters in the Consultation Paper:

- Changes to AEMO's determination timeframes in respect of the Process.
- Automation of the Process by creating MSATS interfaces which participants can use to submit new Applications and extend current Applications.
- Adoption of 1 November 2023 as the effective date of the Changes, as well as the relevant system implementation, to align with other MSATS changes.

AEMO received 11 written submissions in response to the Consultation Paper.

After considering these submissions, AEMO proposed the following further matters in the Draft Report:

- Extension of the timeframes for AEMO to decide on an Application.
- Insertion into the Procedure of the details of the timing and contents of the MDP Action Plan which is required to accompany an Application.

AEMO received five written submissions, including one late submission, in response to the Draft Report.

- These submissions raised the material issue of the effective date of the Changes.

During the development and testing of the Application Process Automation, AEMO identified required changes to the metering installation malfunction exemption fields in the B2M XML schema.

In addition to meeting PLUS ES on 14 July 2023, AEMO held an industry workshop on Friday 18 August 2023 to:

- engage on feedback received in respect of the Draft Report; and
- discuss implementation considerations for the schema changes.

Subsequently, AEMO requested additional written feedback from participants on:

- the preferred effective date; and
- the schema implementation option.

AEMO received 14 responses, most of which supported:

- the deferral of the effective date to early March 2024; and
- a full schema update to version r44.

Accordingly, AEMO's final determination is to defer the effective date to 4 March 2024 for the Changes, to allow sufficient time for participant readiness.

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1. Stakeholder consultation process

AEMO has consulted on the Proposal in accordance with the standard rules consultation procedure in NER 8.9.2.

AEMO’s process and timeline for this Consultation are as follows.

Consultation steps	Dates
Consultation Paper published	12 April 2023
Submissions due on Consultation Paper	12 May 2023
Draft Report published	16 June 2023
Submissions due on Draft Report	17 July 2023
Final Report published	27 September 2023

AEMO’s consultation webpage for the Proposal can be found [here](#)¹. The webpage contains all published papers and reports, written submissions, and other consultation documents or reference material.

AEMO thanks all stakeholders for their feedback, which has been considered in preparing this Final Report.

¹ <https://aemo.com.au/consultations/current-and-closed-consultations/metering-installation-exemption-automation-consultation>

2. Background

2.1. Context for this consultation

In 2020, AEMO conducted industry workshops and collected participant feedback on the MSATS Standing Data Fields in preparation for the MSATS Standing Data Review. The formal consultation process commenced in February 2020². Industry participants proposed the addition of two new metering installation fields to MSATS (Fields), being:

- Meter Malfunction Exemption Number field. This field holds the exemption number in respect of an Exemption which has been granted by AEMO.
- Meter Malfunction Exemption Expiry Date. This field holds the expiry date for the relevant Exemption.

This information would allow Metering Coordinators to better communicate exemptions relating to meter malfunctions to other market participants.

At the time, AEMO agreed with the majority of participants that:

- The addition of the Fields is beneficial.
- AEMO is the appropriate party to be responsible to update and maintain the Fields.

As a result of the MSATS Standing Data Review, AEMO added the Fields in the implementation phase of the MSATS Standing Data Review. However, AEMO noted that the Fields would be populated and updated only once the Process is automated, because it would not be practical or efficient for participants, or AEMO, to enter this information manually.

Accordingly, the proposal was that once AEMO automated the Process:

- A participant would be able to apply for an Exemption online through the MSATS interfaces, thereby replacing the current manual process.
- AEMO would assess the Application, then reject or approve the Application through the MSATS interfaces, which would involve the system updating the Exemption details into the Fields in MSATS. A participant who is associated with the exempt NMI(s) would be notified of these details of the Exemption by MSATS.

2.2. NER requirements

AEMO is responsible for the establishment and maintenance of metering procedures specified in Chapter 7, except for procedures established and maintained under NER 7.17.

The procedures authorised by AEMO under NER Chapter 7 must be established and amended by AEMO in accordance with the Rules consultation procedures.

2.3. The national electricity objective

Within the specific requirements of the NER applicable to this Proposal, AEMO will seek to:

- Make a determination that is consistent with the national electricity objective (NEO).

² Details for the MSATS Standing Data Review consultation can be found [here](#).

- Where considering options, select the one best aligned with the NEO.

The NEO is expressed in section 7 of the National Electricity Law as:

to promote efficient investment in, and efficient operation and use of, electricity services for the long-term interests of consumers of electricity with respect to:

- (a) price, quality, safety, reliability, and security of supply of electricity; and
- (b) the reliability, safety, and security of the national electricity system.

3. Discussion of material issues

3.1. Effective Date

3.1.1. Issue summary and submissions

In the Draft Report, AEMO determined that 1 November 2023 should be the effective date of the Changes, to align with other MSATS changes effective on the same date. In their feedback, stakeholders raised the following issues:

- PLUS ES did not support 1 November 2023, and recommended that the effective date should instead be late February or early March 2024, for the following reasons:
 - The automated solution is a new tool. Participants will not be familiar with its design and workings, until they have had the opportunity to access the finalised documentation, to user test it, and to validate their assumptions.
 - The technical specifications including APIs, etc, were not available to MCs prior to 1 August 2023.
 - Sandpit or preproduction is not available eight weeks prior to 1 November 2023.
 - The Procedures and Guidelines would have not been finalised by the minimum of the four months prior to 1 November 2023, which would be necessary to allow MCs to re-engineer and deliver their end-to-end system and business processes.
- Vector Metering proposed that the effective date should be deferred from 1 November 2023 to May 2024, reflecting a requirement that most of the automation infrastructure should be in place at least 3-4 months before go-live, in order to build an application that utilises the AEMO APIs for exemption management.
- Intellihub agreed with the issues raised by other MCs that the 1 November 2023 effective date and the short window for testing (proposed to start 2 October 2023) was challenging because of the need to design for a new solution (as opposed to an incremental update to an existing solution). Given the exemption automation is not driven by a hard date defined by the NER, Intellihub wanted to explore the option of delaying the effective date to 2024, or any other option to help eliminate or minimise the relevant risks.

During the development and testing of the Application Process Automation, AEMO observed that:

- The MeterMalfunctionExemptionExpiryDate element does not allow for the field to be nullable.
- The Procedures only allow for the MeterMalfunctionExemptionNumber element to be up to 8 characters.

To address these issues, the following changes to the B2M XML schema would be required.

Change Description	Change Type
Update the MeterMalfunctionExemptionExpiryDate element to enable the field to be nullable within the ElectricityNMIMasterGroup	Bug Fix
Update the MeterMalfunctionExemptionNumber element size from 8 to 15 within the MeterMalfunctionExemptionNumber simpleType,	Bug Fix

Change Description	Change Type
as current exemption numbers go beyond 8 characters, and the system was built to allow for 15 characters.	

AEMO held the industry workshop on Friday 18 August 2023 to:

- engage on feedback received in respect of the Draft Report; and
- discuss implementation considerations for the schema changes.

Subsequently, AEMO requested additional written feedback from participants on:

- the preferred effective date; and
- the schema implementation option.

AEMO received 14 responses, most of which supported:

- the deferral of the effective date to early March 2024; and
- a full schema update to version r44.

The details of the industry workshop and the feedback received subsequently can be found [here](#)³.

3.1.2. AEMO's assessment

Given the participant feedback on the Draft Report and the discussion around the B2M XML schema changes, AEMO assesses that:

- Participants may not have enough time to prepare and update their business process and systems for the new MSATS Portal and APIs for the metering installation exemption by 1 November 2023.
- March 2024 is the only other suitable effective date, given resource availability and project costs.

3.1.3. AEMO's conclusion

AEMO concludes that the effective date of the Changes will be 4 March 2024.

Regarding the scheduling proposals, AEMO notes that:

- The new effective date of the Procedures is 4 March 2024. However, the system changes will be released to production on Sunday 3 March 2024, to reduce impacts on participant BAU operations.
- The MSATS Portal and API functionality for the metering installation exemption automation will be released into the preproduction environment in early October 2023, to allow for sufficient industry testing before the 4 March 24 effective date.
- The B2M XML Schema version update (r44) will be released into preproduction later in 2023, noting that the ASWG approval process is currently underway.

³ <https://aemo.com.au/consultations/current-and-closed-consultations/metering-installation-exemption-automation-consultation>

- The current version of the technical specifications can be found [here](#)⁴, including details of:
 - the metering installation exemption; and
 - the [Metering Exemptions API Reference](#)⁵.

4. Other matters

4.1. Deleting section 1.4 from the Procedure

AEMO deleted section 1.4 Metering Exemption Framework from the Procedure. Section 1.4 had been included in the first and second stages of this Consultation.

Section 1.4 was intended to clarify that any changes to the Metering Exemption Framework that may be made in the NER may require changes to the Procedure, to ensure all aspects of the Procedure are appropriate.

However, AEMO deleted section 1.4, because AEMO considers section 1.4 to be redundant.

4.2. Adding clause and subclause numbering to the Procedures

AEMO has added clause and subclause numbering to different sections of the Procedures, as follows, to provide clarity and to avoid confusion in respect of the relevant obligations and processes:

- Procedure section 2.3, AEMO's Determination, has been restructured and renumbered.
- Procedure section 2.7, Extension to Exemption, has been revised to add clause numbering and new clauses.
- Guideline section 2.2.1, Maximum Period of Exemption, has been revised to add clause numbers.
- Guideline section 3.2, Form of Application, has been restructured and renumbered.

⁴ MSATS - Technical Specification – November 2023 (aemo.com.au)

⁵ [Metering Exemption API Reference \(getpostman.com\)](https://getpostman.com)

5. Final determination on proposal

Having considered the matters raised in submissions to the Draft Report and at the consultation meetings, AEMO's final determination is to amend the Procedures, in the form published with this Final Report.

The final amendments to the Procedures differ from the draft determination in the following material respects, for the reasons discussed in sections 3 and 4 of this Final report:

- The effective date of the Changes has been deferred to 4 March 2024.

The following Procedures are to be amended in the form published with this Final Report, in accordance with the NER:

- Exemption Procedure – Metering Installation Malfunctions.
- Exemption Guideline for Small Customers.
- Retail Electricity Market Procedures – Glossary and Framework.

Finally, an updated version of the Standing Data for MSATS document will be published with this Final Report, to reflect the B2M XML Schema changes.

Appendix A. Glossary

Term or acronym	Meaning
CATS	Consumer Administration and Transfer Solution, a part of MSATS.
DNSP	Distribution Network Service Provider
MDP	Metering Data Provider
MP	Metering Provider
MC	Metering Coordinator
MSATS	Market Settlements and Transfer Solution
NEM	National Electricity Market
NER	The National Electricity Rules made under Part 7 of the National Electricity Law
NMI	National Metering Identifier
B2M	Business to Market
ASWG	aseXML Standards Working Group
API	Application Programming Interface

Appendix B. List of Submissions and AEMO Responses

Table 1 Exemption Procedure (Metering Installation Malfunctions)

No.	Section	Description	Stakeholder	Participant comments	AEMO response
1	1.4 Metering Exemption Framework	Added a new section to note that the procedure may change subject to the changes to the Metering Exemption Framework which might be made in the NER	AGL	Noted	
2	1.4 Metering Exemption Framework	Added a new section to note that the procedure may change subject to the changes to the Metering Exemption Framework which might be made in the NER	CitiPower Powercor	No comment	
3	1.4 Metering Exemption Framework	Added a new section to note that the procedure may change subject to the changes to the Metering Exemption Framework which might be made in the NER	United Energy	No comment	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
4	1.4 Metering Exemption Framework	Added a new section to note that the procedure may change subject to the changes to the Metering Exemption Framework which might be made in the NER	Vector Metering	There does not appear to be any value in adding this clause. Any procedure or guideline is subject to change depending on the Rules.	AEMO agrees with the respondent's comment and will delete this section. The relevant information will be added in the final determination instead.
5	1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	AGL	Noted	
6	1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	CitiPower Powercor	No comment	
7	1.5 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	United Energy	No comment	
8	2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	AGL	AGL Supports the change	AEMO notes the respondent's support for the change.
9	2.2 Timing of Application	Deleted reference to Appendix A due to	CitiPower Powercor	No comment	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
		exemption process automation			
10	2.2 Timing of Application	Deleted reference to Appendix A due to exemption process automation	United Energy	No comment	
11	2.3 AEMO's Determination	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption process will be two steps process.</p>	AGL	Noted; although AGL considers that the additions are complex and those relating to system processes (which are information in nature) should be separated from clauses relating to obligations placed on parties.	<p>AEMO notes the respondent's comment and clarifies that the purpose of the Procedure is to set out the process by which an MC can apply for exemption under NER 7.8.10(b). Section 2 of the Procedure details the "Application Process".</p> <p>Therefore, it is valid to include the description of the system processing in Section 2 of the Procedure.</p>
12	2.3 AEMO's Determination	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption process will be two steps process.</p>	CitiPower Powercor	No comment	
13	2.3 AEMO's Determination	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption</p>	United Energy	No comment	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
		process will be two steps process.			
14	2.3 AEMO's Determination	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption process will be two steps process.</p>	Vector Metering	<ul style="list-style-type: none"> • Clauses 2.3(a) and 2.3(a)(ii) appear to contradict in regard to when a unique ID number is provided for an application. Cl 2.3(a) says that AEMO has 2 business days from the receipt of an application, but clause (a)(ii) says it will be allocated immediately upon the application being saved into the portal. • The second paragraph in Cl2.3.(a)(ii) regarding the timing of the CR notifications is unclear. Are participants provided with a CR notification when the application is approved, or when it is raised? This could be 10 days apart. This should be clarified. Perhaps this statement should be elsewhere in the document. i.e. 2.3.(d) • As submitted in the first round consultation we believe that AEMO should issue an email to the MC indicating that an exemption has been processed and a determination has been made .i.e. approved, rejected or more info required. Sending an email is not difficult to do and will greatly improve the efficiency of the process. This will then all the MC to respond accordingly. Requiring the MC to continuously monitor the status of exemptions in the portal is inefficient. 	<p>AEMO notes the respondent's comment and has clarified clause 2.3(a) to avoid confusion related to timeframes around assigning the unique application ID or verifying it.</p> <p>AEMO agrees with the respondent's comment and has moved the second paragraph to a separate clause.</p> <p>Regarding the exemption application rejection or approval notification, AEMO clarifies there is a functionality within the portal and the API which allows for an automated API request to be sent on a daily basis to request a list of exemptions with rejected and more info status.</p>
15	2.3(b)(ii)		PLUS ES	<p>Editorial:</p> <p>* There are words missing to complete the syntax in the sentence below.</p> <p>When all required information has been provided, * approve or reject the application and advise the Metering Coordinator via the MSATS system.</p>	AEMO notes the respondent's comment and will reword the clause to avoid confusion.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				PLUS ES suggests the inclusion of ... AEMO will... for completeness.	
16	2.4. Matters taken into Consideration	Clarify the meaning of clause (b)	Vector Metering	<ul style="list-style-type: none"> It is unclear what clause (b) means when it says that AEMO will consider the nature of the metering installation malfunction and whether it was caused by the current MC. It is unclear how a MC might breach the NER to create a malfunction at a metering installation. Can AEMO please provide some examples on how this may occur? 	AEMO notes the respondent's comment and clarifies an example of where a metering installation malfunction was caused by the MC breaching the NER would be where a metering installation did not meet the requirements of NER Schedule 7.4 and had not been tested in accordance with the requirements of NER Schedule 7.6.
17	2.4 Matters taken into Consideration	Clause (b)	PLUS ES	<p>(b) The nature of the metering installation malfunction and whether it was caused by a breach of the NER by the Current MC.</p> <p>PLUS ES proposes AEMO reviews this clause and rewords accordingly for clarity. It is not clear how a current MC could cause a metering malfunction by a breach of the NER and how to apply this requirement.</p>	AEMO notes the respondent's comment and refers to table 1, item 16.
18	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	AGL	<p>Noted, although given the importance of the clause, further clarification may be warranted:</p> <p>An exemption granted by AEMO will commence on the date that AEMO received the application via MSATS and <u>or the date that AEMO has received the completed supporting documentation (if required) via the email process, -(whichever is the greater) later.</u></p> <p>Note, this clause may also be inconsistent with Cl 3.4 of the Exemption Guidelines, small customers.</p>	AEMO agrees with the respondent's comment and has reworded the clause.
19	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	CitiPower Powercor	No comment	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
20	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	PLUS ES	<p>PLUS ES notes concern that the following, would have the MC in breach of the NER, though they have remained compliant to their requirements.</p> <ul style="list-style-type: none"> The Exemption commencement date is the date on which AEMO receives all required documents and The proposed extended AEMO timeframes to process an exemption application. <p>For example, the MC discovers on day 13 that the metering malfunction cannot be resolved by day 15. The MC submits an exemption application on day 13, AEMO has given an exemption ID and AEMO has until day 23 to ask for additional information. Even if the MC responded with additional information on the same day, and AEMO reviewed the information on the 10th business day (day 33) - which they are allowed to do as per the draft procedure - if approved, the exemption would be granted on day 33 and only back dated to day 23 - which would mean that the MC would be in breach of the Rules from day 15 to day 23.</p> <p>We also note AEMO's comment to feedback provided in the earlier submission - AEMO notes that the exemption starts from the date AEMO receives all required documents, and that the exemption approval date will be visible for audit processes along with the exemption application date.</p> <p>PLUS ES supports this approach also creates greater administrative effort during auditing, creates additional effort from participants to manage their compliance performance and respond to metering installation status enquiries. Remembering that in addition to NER and AEMO obligations, bilateral commercial agreements may have additional requirements.</p> <p>For market efficiency and due to the MC compliance implications PLUS ES proposes AEMO reconsiders</p>	<p>AEMO notes the respondent's comment and clarifies that Section 2.5 states "AEMO may grant the exemption on a conditional basis."</p> <p>Almost all of the previous and current approved exemptions with "Condition of Exemption" are large/ HV metering installations.</p> <p>Conditional approval of Exemption is given whilst AEMO is waiting for the final rectification plan and additional documents. Where a conditional approval is granted to a participant the exemption will be expired if the conditions are not resolved by the date nominated by AEMO.</p> <p>There's no need to change the dates or days required in the current Exemption Procedure.</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				the Exemption commencement date to be the date the application was received. (Without the additional criteria of all relevant documents are received.)	
21	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	United Energy	No comment	
22	2.5 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Vector Metering	<ul style="list-style-type: none"> Date of any exemption commencement should be date that exemption was applied for, not when supporting documentation is provided. Unlike the current process where all necessary information is generally provided with the application, this is not the case under the new two-step process. The new process introduces delay before any additional information can be sent. The date that AEMO made the exemption should be visible for audit processes. Setting the Date of commencement for the exemption to the final date when all documentation is provided can create a situation where there is a short period that the malfunction is present without an exemption. This will generate work for the AER and MC's as presumably MC's only option will be to raise 'no action' requests to cover this short period where they do not have an exemption. This will provide little value and will tie-up valuable industry resources. 	AEMO notes the respondent's comment and refers to table 1, item 20.
23	2.6 Application Unsuccessful	deleted the following point: A failure to complete the application form;	AGL	Noted	
24	2.6 Application Unsuccessful	deleted the following point: A failure to complete the application form;	CitiPower Powercor	No comment	
25	2.6 Application Unsuccessful	deleted the following point:	United Energy	No comment	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
26	2.6 Application Unsuccessful	<p>A failure to complete the application form;</p> <p>deleted the following point:</p> <p>A failure to complete the application form;</p>	Vector Metering	<ul style="list-style-type: none"> Clause 2.6(a) indicates that AEMO may reject an exemption request if further information is not provided by the MP by the date AEMO specified. AEMO should provide some indication on how long MP will have to provide this information. We have concerns that AEMO may set a unrealistic time frame. E.g. 1 business day. Given that MC are not notified when AEMO has changed the status of an exemption MC may not be immediately aware of the request to providing the extra information until it is too late to respond. Note: after reviewing the guideline it is unclear where this date will be set in the portal. More information is required on how long AEMO will give MC before rejecting a application on the grounds that information was not provided by the specified date. 	<p>AEMO notes the respondent's comment and clarifies the following:</p> <p>1- Additional supporting documents are those that can be provided by the MP to the MC and those from the directly from the MC, such as (but not limited to the following);</p> <ul style="list-style-type: none"> Evidence of correspondence between the retailer and customer confirming their agreement on the rectification of the metering installation. Copy of MP field/ investigation report site photos equipment test report network shutdown schedule <p>2- MDP Actions (Action Plan or Activities etc) are those to be acted/ performed by the MDP on meter data provisions for the duration of the exemption, such as (but not limited to the following);</p> <ul style="list-style-type: none"> Evidence (like email) of agreement with the MC. Technical computation/ derivation of scaling factors applied on meter data. Details of Proposed/ Planned MDP Metrology Procedure for Meter Data Substitution/ Estimation <ul style="list-style-type: none"> Provide details of the "Metrology Procedure Part B" Substitution/ Estimation "Type". State why this is the chosen "Type". Periods of Meter Data Substitution/ Estimation <ul style="list-style-type: none"> Provide the period/ dates of substituted/ estimated meter data will be provided to the Market/ AEMO.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
					<ul style="list-style-type: none"> ○ Provide the period/ dates for each Substitution/ Estimation “Type”, if different methods and types are used. <p>Additional Supporting documents and MDP action plans are normally provided at the same time. This is because if one or both are still missing, then AEMO cannot review and process the exemption application. If only one document is provided, then AEMO will wait for the other documents to complete the review and assessment of the exemption application.</p>
27	2.7 Extension to Exemption	Deleted reference to Appendix B. Added a new section about AEMO’s notification of expiring exemptions and the process of extension.	AGL	Noted	
28	2.7 Extension to Exemption	Deleted reference to Appendix B. Added a new section about AEMO’s notification of expiring exemptions and the process of extension.	CitiPower Powercor	No comment	
29	2.7 Extension to Exemption	Deleted reference to Appendix B. Added a new section about AEMO’s notification of expiring exemptions and the process of extension.	PLUS ES	PLUS ES notes AEMO’s comment to our previous submission that the timeframe has been increased to 21 business days. The Procedure has 21 days not 21 business days. The word business needs to be added.	AEMO clarifies that this should be “days” and not “business days” as the system is built based on calendar days and not business days.
30	2.7 Extension to Exemption	Expiration of extensions	PLUS ES	AEMO has noted against our comment in the previous submission:	AEMO agrees with the respondent’s comment and will update the procedure to clarify timing of expiration of exemption extension.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>AEMO notes that a submitted extension application which has not been actioned by the expiry date, will trigger the exemption to be expired.</p> <p>The Procedure notes:</p> <p>If exemption extensions are not submitted prior to the expiry date, then the exemption will be updated to Expired.</p> <p>PLUS ES seeks clarification with respect to timings which will cause an extension to be expired, i.e. actioned vs submitted. For efficiency, we recommend that applications that have been submitted in time should not be expired.</p>	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
31	2.7 Extension to Exemption	Submission of extension timeframe prior to expiration.	PLUS ES	<p>The Procedure notes:</p> <p>any application for an extension must be submitted to AEMO at least seven days prior to the expiry of the exemption and</p> <p>clause 2.3 (b) states: Within 10 business days of receipt of an application for exemption or extension</p> <p>PLUS ES proposes the following for efficiency by mitigating expired exemptions:</p> <p>Timeframes between clauses and obligations are reviewed to support each other.</p> <p>Consistency in the timeframe measurements – days vs business days.</p> <p>For example, if the expiry date is 12/7:</p> <p>10 business days – the MC must submit the application on or prior to the 28/6 to be processed.</p> <p>But if they are required to submit at least 7 days (by the 5/7), what is the outcome of the extension application if AEMO has 10 business days to review and approve?</p>	AEMO notes the respondent's comment and refer to table 1, item 30.
32	2.7 Extension to Exemption	<p>Deleted reference to Appendix B.</p> <p>Added a new section about AEMO's notification of expiring exemptions and the process of extension.</p>	United Energy	No comment	
33	2.7 Extension to Exemption		Vector Metering	<ul style="list-style-type: none"> Time frames should be in business days for consistency 	AEMO notes the respondent's comment and refers to the response in table 1 item 29.
34	2.8 Current MC's Obligations during	Updated 2.8(f) to include timeframes for notifying new MC of	AGL	Noted	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
	the Exemption Period	existing exemptions and clarified the point to align with the automation process.			
35	2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	CitiPower Powercor	No comment	
36	2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	United Energy	No comment	
37	2.8 Current MC's Obligations during the Exemption Period	Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.	Vector Metering	<ul style="list-style-type: none"> As indicated in our first-round submission, there are notification obligations in CI 2.8 that are unnecessary given that affected parties will receive notification via CATS CR's. In AEMO's response to first-round submissions, AEMO stated that they consider the CR notifications generated by MSATs will provide the affected parties with the necessary notice. AEMO statement provides even further justification for the removal of these requirements. CI2.8 (a), 2.8(d),2.8(e) should be removed or updated to reflect that MSATs is performing this function. As indicated in our first-round submission, given that participants will receive notification of details of an exemption and the resolution date in the MSATs CR notification, and that details 	<p>AEMO notes the respondent's comment and has clarified the procedure regarding the CR notifications.</p> <p>Regarding the rectification plan, AEMO clarifies the respondent's comment is based on a small use customer metering installation/ a residential customer with a single or three-phase direct connect meter. On a few occasions, there have been requests from Ombudsman and AER to provide copy of the document due to ongoing investigation of a customer complaint. The respondent is referring to specific participants (MCs and MPs).</p> <p>The respondent's comment does not apply if the customer is a large customer (HV, LV CT,</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>will be available via MSATS browser and reports, we do not believe MC's should have the obligation under 2.8(b) to provide unsolicited rectifications plans to all affected parties. Experience has shown that affected parties are not interested in the details of the rectification plan, apart from the resolution date. As the key information from the rectification plan (the date that the malfunction is planned to be resolved by) will be available in MSATS, we believe that the provision of the rectification plan should be on request to the MC rather than requiring the MC to always issue to all participants upon AEMO approval. Parties who are interested in the details of the rectification plans can request it individually or place 'standing instructions' to the MC to always issue any plan to them. We are confident that this will reduce the number of transactions flowing between participants leading to saving for all parties.</p>	<p>generator etc.). The rectification plan is much more important on these of metering installations. TNSP and DNSP rely on the information provided in the Rectification Plans in order to schedule lines and substations maintenance works and shutdown. The MP Rectification Plan are prepared and owned by the current MP. If there is MC churn and change of MP, the new MP must prepare a new Rectification Plan and submits it to the new MC to support their new exemption application for the same NMI.</p>
38	2.8 Current MC's Obligations during the Exemption Period	Clause (b)	PLUS ES	<p>From experience and an efficiency perspective, PLUS ES supports the removal of this clause in its entirety from an efficiency perspective. We also note AEMO's comments about obligations need to remain and propose an alternative:</p> <p>Clause (b):</p> <ul style="list-style-type: none"> When requested, within 2 business days, provide an affected Participant a copy of the MP's rectification plan or alternatively, Within 2 business days, provide all affected Participants with a copy of the MP's rectification plan for LVCT and HV metering. (Similar to the conditional requirements of MDP action plans) 	<p>AEMO notes the respondent's comment and clarifies the respondent is referring to a small customer metering installation point and referring to certain affected participants (MC, MP, customer, retailer). It is preferable to inform other affected participants like TNSP, DNSP, LNSP and generators as early as possible in order to schedule lines and substations maintenance works and shutdown.</p> <p>AEMO clarifies that the Exemption Automation is only limited to automating the "Exemption Application Form" and not automating the "Whole Exemption Process".</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>Our proposal is supported by the following points – driven by the solution to be implemented and determinations from 6+ years of managing malfunctions and enquiries about malfunctions:</p> <ul style="list-style-type: none"> • Driving efficiencies in the market: <ul style="list-style-type: none"> ○ Removing the requirement to notify of the approved exemption or extension, as affected Participants will get CR notifications of the Exemption ID and the Exemption Expiry Date ○ Ensuring provision of information is provided such as MP rectification plan, when needed or utilised – reducing the volume of administrative ‘noise’ and participant cost. • The current AEMO Procedure obligations were written in 2017 with a specific process in mind. Since then a decision was made to include the information in MSATS for Participant visibility and market efficiency. AEMO determined to implement an automated process to enable the population of the fields. PLUS ES supports that this scenario is no different from any other piece of information communicated in MSATS. i.e. TNI, GNAF PID, etc. <p>Hence, while the obligation is on the MC to apply for exemptions from AEMO, due to the automated solution, availability and population of the exemption ID/expiry date in MSATS and AEMO issuing and populating the fields, the obligation as written cannot remain with the MC to advise affected Participants. The proposed amendments to this procedure also state in section 2.3(a):</p> <p><i>Other participants who have a relationship with the NMI within the exemption will receive notification</i></p>	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p><i>via the CR Notification process as MSATS is populated or re with Unique ID and exemption expiry date upon approval or when these values in the fields are removed upon expiry of exemption, rectification of metering installation or cancellation of exemption.</i></p> <ul style="list-style-type: none"> The obligation to provide the MP plan to affected Participants (not including AEMO) is an AEMO obligation and is not a direct outcome of a NER clause. NER clause 7.8.10(c) states: (c) If an exemption is provided by AEMO under this clause 7.8.10 then the Metering Provider must provide AEMO with a plan for the rectification of the metering installation. AEMO can collaborate with industry to drive market efficiencies by making appropriate amendments to their Procedure. Additionally, the consultation rule changes recently applied, give AEMO the flexibility to extend the consultation by another round, as required. 	
39	General	Missing CATS AEMO Obligation	PLUS ES	<p>Furthermore, PLUS ES also recommend that an obligation should be included in section 2.10 AEMO CATS procedure to support the requirement for AEMO to populate MSATS, similar to TNI, GNAF PID, etc obligations. For example, AEMO must: Populate MSATS with the Exemption ID and the Exemption Expiry Date following the approval of an exemption or exemption extension application.</p>	AEMO agrees with the respondent's comment and will add the obligation in one of our future CATS procedures consultations.
40	2.8 Current MC's Obligations during the Exemption Period		PLUS ES	<p>With similar supporting points to those provided against clause (b), PLUS ES recommends amending clause (d) as follows: (d) Keep AEMO informed of any changes to the MP's rectification plan including providing a copy of</p>	AEMO notes the respondent's comment and clarifies it is a rule requirement to provide rectification plan to support exemption application for metering installation malfunction.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				the amended rectification plan. Provide all affected Participants, a copy of the amended MP Rectification plan for LVCT and HV metering.	the Rules do not differentiate which type of metering installation it is.
41	2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	AGL	Noted	
42	2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	AGL	Noted	
43	2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	United Energy	No comment	
44	2.9 Expiry of Exemption	Modified the section points to reflect the meter exemption process automation and how the exemption expiry will work in the automated process	Vector Metering	For the paragraph “When the above conditions are met, the exemption will move to a Closed status”. Suggested improved wording “When any of the above conditions are met, the exemption will move to a Closed status”	AEMO agrees with the respondent’s comment and has made the update to the procedure.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
45	2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	AGL	Noted. Although an explanation of why the exemption may not be closed or expired would assist understanding.	AEMO notes the respondent's comment and clarifies that there might be other NMIs in the exemptions. AEMO refers the respondent to table 1, item 48.
46	2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	CitiPower Powercor	No comment	
47	2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	United Energy	No comment	
48	2.10 Removal of a NMI from Exemption	Added a new section for the removal of a NMI from the exemption	Vector Metering	<ul style="list-style-type: none"> For the paragraph "The removal of a NMI from an exemption may not trigger the expiration or resolution of an exemption." suggested improved wording "The removal of a NMI from an exemption may not trigger the expiration or resolution of an exemption unless it is the last remaining NMI active in the exemption." 	AEMO agrees with the respondent's comment and has made the update to the procedure.
49	2.11 Revocation of Exemption		PLUS ES	<p>PLUS ES recommends modifying the clause to reflect the metering installation exemption automation process and its benefits by deleting the last part of the section</p> <p>...whereupon the Current MC must notify all affected Participants of the revocation within one business day.</p> <p>Whilst we acknowledge AEMO comments and the intent is to have all affected Participants made aware of the revocation, we do not agree with the obligation as written nor should it sit with the MC. Please refer to PLUS ES supporting points against section 2.8 (b).</p> <p>Additionally, the MC is dependent on the interpretations of Participants. This clause could be interpreted literally placing an additional obligation and cost on the MC to inform Participants as the CR notifications are not directly triggered by the MC.</p>	<p>AEMO notes that the obligations in the procedures need to remain and cannot be removed because of the automation, the automation may provide a solution to participants to achieve their obligation, however the obligation needs to remain.</p> <p>AEMO notes that this clause may be revised and updated further post the AEMC metering review.</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
50	3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	AGL	<p>Noted.</p> <p>Given that MDP processes are governed by the metrology procedure, it is expected that the consistent response to 3.1 ii will most likely be 'Substitute data in accordance with the metrology procedures.' As such, this is unlikely to be a useful or relevant piece of information but will meet the requirements of this clause.</p> <p>AGL suggests that AEMO consider what would be useful other than the statement on substitution, and if there is nothing else, make the obligation optional or required only for Types 1-3 meters. AGL does not consider this of value for types 4 to 6 meters relevant given the substitution is part of the meter data stream.</p>	AEMO notes the respondent's comment and clarifies the intent of the MDP action plan is to advise AEMO and Participants of the likely timeframe that metering data substitutions would be applied for the NMI.
51	3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	CitiPower Powercor	No comment	
52	3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	United Energy	No comment	
53	3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	Vector Metering	<ul style="list-style-type: none"> Given that the provision of a rectification plan is not mandatory and is dependent on where it is practicable to do so (i) and (ii) should be reworded. The word 'Must' should be replaced with 'Should'. e.g. "The Current MC should provide a draft of the MP's rectification plan with its application for exemption." And "The Current MC should provide a MDP action plan for HV and LV CT sites with its application for exemption." 	AEMO agrees with the respondent's comment and has updated the procedure accordingly.
54	3.2 Contents	Added a new section on the MDP action plan	AGL	<p>Noted.</p> <p>Again, AGL questions the value of this. Whatever proposed substitution method is chosen, can be changed by the FRMP/LNSP/ENLR. Further, the</p>	AEMO notes the respondent's comment and refers to table 1, item 50.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>options for substitution may change over time or as other data becomes available, rendering this initial information irrelevant.</p> <p>The period substitutions are to be used is generally outside the control of the MDP (and sometimes the MP) if customer equipment (eg VT/CTs) are required to be purchased or imported.</p> <p>The details of the substitutions are provided in the NEM12 or NEM 13 file and are scrutinised by the relevant participants who may request changes to those processes.</p> <p>Further, if the meters which are being submitted for exemption are DB meters, there is less interaction between contestable MCs and Regulated MDPs.</p> <p>Finally, AGL does not consider the benefits of requiring MCs to provide this information for the majority of applications (ie types 4-6 meters) is worthwhile, and the imposition of this requirement does not meet the cost-benefit for which it may be used.</p> <p>AGL proposes that this only be applied to requests for Types 1-3 meters.</p>	
55	3.2 Contents	Added a new section on the MDP action plan	CitiPower Powercor	No comment	
56	3.2 Contents	Added a new section on the MDP action plan	United Energy	No comment	
57	3.2 Contents	Added a new section on the MDP action plan	Vector Metering	<ul style="list-style-type: none"> As indicated in our first-round submission we do not agree with the inclusion of a MDP rectification plan for the following reasons.: <ol style="list-style-type: none"> There is no requirement in the Rules to provide this. AEMO has argued that requiring this 	AEMO notes the respondent's comment and refers to table 1, item 50.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>detail is not a new obligation because it currently exists in the exemption procedure. AEMO referenced the application form in Appendix A and B, items 10 and 11 respectively. We do not agree that these existing items reflect the information proposed to be included in the MDP rectification plan. In our view these existing fields only contain high-level remarks from the MC. For example, "Substituted readings will be provided for the duration of the malfunction". Also, the MC is not an accredited MDP so it would be inappropriate to direct the MDP on how substitution should be applied, rather the MDP should follow its accredited processes to determine that substituted readings are generated inline with Met Procedure Part B and their accreditation. These existing fields are fundamentally different to the information that AEMO is now requiring to be provided when the exemption application is made therefore constitutes new obligations that are not supported by the Rules.</p> <p>2) Malfunctions exemptions are typically raised on sites with legacy metering and the path to rectification usually means the meter will be replaced. This will trigger the MDP and MP to change. The contestable MC does not necessarily have a commercial relationship with the legacy MDP to require them to provide a rectification plan. In these situations, given the current MDP is likely to soon be displaced provision of the MDP information required by AEMO is unlikely to be provided to the MC.</p> <p>3) MDP's already provide most of the information in the NEM12/NEM13 file when the substituted reads are provided.</p>	
58	Appendix A. Application for Exemption	Deleted Appendix A	AGL	Noted.	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
59	Appendix A. Application for Exemption	Deleted Appendix A	CitiPower Powercor	No comment	
60	Appendix A. Application for Exemption	Deleted Appendix A	United Energy	No comment	
61	Appendix B. Application for Extension	Deleted Appendix B	AGL	Noted.	
62	Appendix B. Application for Extension	Deleted Appendix B	CitiPower Powercor	No comment	
63	Appendix B. Application for Extension	Deleted Appendix B	United Energy	No comment	

Table 2 Metering Exemption (Small Customer Metering Installation)

No.	Section	Description	Stakeholder	Participant comments	AEMO response
1	1.3 Related documents		PLUS ES	PLUS ES notes that the Exemption Procedure Metering Installation Malfunction has been added to the related documents. We do not think there is a relationship between small customer exemptions and metering malfunction exemptions. Propose to update if erroneously added.	AEMO agrees with the respondent's comment and has updated the procedure accordingly.
2	1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	AGL	Noted	

No.	Section	Description	Stakeholder	Participant comments	AEMO response
3	1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	CitiPower Powercor	CitiPower Powercor acknowledges and agrees with AEMO's response to our position as per Table 3 Item 2 of this consultation's Draft Determination Report published 16 June 2023.	AEMO notes the respondent's comment.
4	1.4 Metering Exemption Guideline	Added a new section advising that the procedure needs to be read in conjunction with the new Metering Exemption Guideline	United Energy	United Energy acknowledges and agrees with AEMO's response to our position as per Table 3 Item 2 of this consultation's Draft Determination Report published 16 June 2023.	AEMO notes the respondent's comment.
5	2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	AGL	Noted	
6	2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	CitiPower Powercor	No comment	
7	2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	PLUS ES	Editorial – replace numerical 30 with the word thirty for consistent formatting.	AEMO notes the respondent's comment and clarifies that numbers 0 to 9 are to be expressed as words (i.e. "zero" to "nine"), numbers 10 or more are expressed in numerals. Refer to Style Guides, e.g. Doxical Style Guide.
8	2.2.1 Maximum Period of Exemption	Deleted point about exemption extension.	United Energy	No comment	
9	2.2.2 Expiry		PLUS ES	<p>PLUS ES recommends that clause (b) is amended to ensure consistent remote acquisition is established. (Where consistent needs to be defined).</p> <p>PLUS ES acknowledges AEMO's comments and respectfully disagree. There is an opportunity to drive efficiency in the consultation space with the procedure being open for consultation irrespective of the trigger. Both AEMO and Participants are equally under resourcing constraints and raising</p>	AEMO notes the respondent's comment and clarifies that the NER definition of "remote acquisition" covers "consistent".

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>and progressing an ICF to consultation and beyond is not a small undertaking.</p> <p>The proposal is a clarification in the process – a item not misaligned with the topic which triggered the procedure to be consulted on.</p> <p>Additionally, PLUS ES understands that the recently implemented consultation rule changes, give AEMO the flexibility to extend the consultation by another round, as required.</p>	
10	3.2 Form of Application	Updated section to reflect the new automated exemption process	AGL	Noted	
11	3.2 Form of Application	Updated section to reflect the new automated exemption process	CitiPower Powercor	No comment	
12	3.2 Form of Application	Updated section to reflect the new automated exemption process	United Energy	No comment	
13	3.2 Form of Application	Updated section to reflect the new automated exemption process	Vector Metering	The format of this section requires review. Industry typically numbers each paragraph for easy reference. Paragraph 3 starting with ‘Current public...’ appears to be the first item in a list but is not labelled as such.	AEMO agrees with the respondent’s comment and has updated the procedure accordingly.
14	3.4	<u>Exemption date</u>	AGL	AGL questions whether the application of the exemption date as of the installation date is inconsistent with Clause 2.5 of the Exemption Procedure, and CI 2.5 needs modification.	AEMO notes the respondent’s comment and clarifies that the metering installation date is appropriate for Type 4A metering installation exemptions as the reason for the exemption is no existing telecommunications. Exemption Procedure – Metering Installation Malfunction section 2.5 dates are related

No.	Section	Description	Stakeholder	Participant comments	AEMO response
					<p>to MCs making an application and providing information to support the rectification of a metering installation malfunction.</p>
15	3.4 Timing of Application		PLUS ES	<p>PLUS ES acknowledges AEMO’s comments and respectfully disagree. There is an opportunity to drive efficiency in the consultation space with the procedure being open for consultation irrespective of the trigger. Both AEMO and Participants are equally under resourcing constraints and raising and progressing an ICF to consultation and beyond is not a small undertaking.</p> <p>Additionally, PLUS ES understands that the recently implemented consultation rule changes give AEMO the flexibility to extend the consultation by another round, as required.</p> <p>PLUS ES recommends a review of the clause and appropriate modifications made to capture most use cases in which the MC may be required and can apply for an exemption.</p> <p>No later than 30 bus days post metering installation – whilst in most cases this may be efficient, there are use cases where 30 bus days is not sufficient timeframe for the MP to exhaust all remedies to establish remote communications. Examples of use cases where remote acquisition capability remediation may exceed 30 bus days: access issues, permissions from strata groups, sourcing of equipment etc.</p> <p>For MC/AEMO efficiencies and processes reflective of real timeframes, PLUS ES recommends the timeframe is extended to 60 business days. Especially as MC and MDP obligations/practices have evolved since these procedures were implemented.</p>	<p>AEMO notes the respondent’s comments and clarifies that 30 business days is sufficient to enable participants to gain enough evidence to support the metering installation being a type 4A and to apply for exemption.</p> <p>AEMO clarifies the clause details timing of application where there is no communication and not about new or old metering installation, however AEMO has updated the clause to avoid confusion.</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				The current scope and wording do not support an exemption application where an established remote communicating metering installation ceases to communicate due to environmental or physical conditions post 30 business days after installation, such as the telecommunications service provider relocating their infrastructure and creating a 'dead zone'. This scenario has been allowed for but only when the MC changes not for the current MC. See also PLUS ES comments against section 4.3 below	
16	3.4. Timing of Application –		Vector Metering	<ul style="list-style-type: none"> During the first round of consultation Vector proposed that this clause be revised because the existing timing limitations on MCs applying for exemptions is not reflective of the realities of remote metering – refer to Vector's first round submission regarding cl 3.4 Time of Application. AEMO rejected this proposal on the basis that changing this clause was 'out of scope' of the consultation. We believe it should be included. Please refer to comments in section 1. regarding the scope of this consultation. 	AEMO notes the respondent's comment and refers to table 2, item 15.
17	3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	AGL	The majority of this clause seems to be a repeat of the material in the Exemption Procedure. As such, there may be risk of inconsistencies between the two documents.	AEMO notes the respondent's comment and clarifies that those are two separate documents, the exemption procedure is for the metering installation malfunction exemptions, and this document is the Exemption Guideline for small customer metering installations.
18	3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	CitiPower Powercor	No comment	
19	3.5 AEMO's Determination	Updated section to reflect the new	PLUS ES	Editorial – replace the numerical 10 with the word ten for consistency.	AEMO notes the respondent's comment and refers to table 2, item 7.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
		automated exemption process			
20	3.5 AEMO's Determination	Updated section to reflect the new automated exemption process	United Energy	No comment	
21	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	AGL	The majority of this clause seems to be a repeat of the material in the Exemption Procedure. As such, there may be risk of inconsistencies between the two documents.	AEMO notes the respondent's comment and refers to table 2, item 17.
22	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	CitiPower Powercor	No comment	
23	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	PLUS ES	<p>PLUS ES acknowledges AEMO's comments and respectfully disagree. There is an opportunity to drive efficiency in the consultation space with the procedure being open for consultation irrespective of the trigger. Both AEMO and Participants are equally under resourcing constraints and raising and progressing an ICF to consultation and beyond is not a small undertaking.</p> <p>PLUS ES recommends the following:</p> <ul style="list-style-type: none"> Clause (b) be modified so that the commencement exemption date is the 'Date first aware of the issue'. This information is requested in the application form and should be used. Any date, other than the metering installation date or the 'Date first aware of the issue' leaves the MC exposed to non-compliance, especially with conditional administrative requirements such as receipt of supporting documentation. <p>The MC will undertake a series of tests etc if a metering installation is not communicating to</p>	<p>Clause (b): AEMO notes the respondent's comment and clarifies the type 4A small customer metering installation issue is more of a technical, operation and site issue where the MP has more involvement. When the issue is first reported (no comms due no available comms network), it means the MP has already visited the site and made the assessments and findings.</p> <p>When the MP reports this to the MC, the MC should require the MP to provide the accompanying report/ comms assessment.</p> <p>MPs do not report "no comms available" without having to check the available comms network, test different antenna and do assessment.</p> <p>In this case, the request to make "the commencement exemption date is the 'Date first aware of the issue'." is not</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>ensure it cannot be resolved before applying for an extension. This should not leave them open to non-compliance. This practice also ensures that potentially unnecessary exemption applications are not submitted.</p> <ul style="list-style-type: none"> Editorial - For succinctness, the conjunction between clause (a) and (b) to be removed or amended from 'and' to 'or' as only one date can apply. 	<p>suitable. This is a case of submitting an exemption application first, before visiting, investigating and assessing the site remote communication network.</p> <p>AEMO agrees with the respondent's comment regarding the editorial change and has updated the procedure accordingly.</p>
24	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	United Energy	No comment	
25	3.6 Grant of Exemption	Clarified the timing of granting the exemption by AEMO	Vector Metering	Clause (b) Indicates that any exemption would start on the later date of the application date or the date when the supplementary documentation (such as the rectifications plans) is supplied. We believe the exemptions date should begin on the date that the application request specifies. It there is a delay in granting an exemption then MC will have periods when they are non-compliant. This will generate work for the AER and MC's as presumably MC's only option will be to raise 'no action' requests to cover this short period where they do not have an exemption. This will have little value and will tie-up valuable industry resources.	AEMO notes the respondent's comment and refers to table 2, item 23.
26	3.7 Current MC's Obligations during the Exemption Period	Clause (a)	PLUS ES	PLUS ES questions the intent and value this obligation delivers, as currently worded. Irrespective what the telecommunications network provider indicates, realistically the MC is certain that coverage has been provided once the metering commences communication. Then the only applicable clause would be (b) where an MC needs to apply for a further exemption if their metering installation will remain without communications.	AEMO notes the respondent's comment and clarifies that clauses (a) and (b) are different, clause (a) is about the problem that is being resolved, and clause (b) is about applying for a new exemption because the issue has not been resolved.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>What is also unclear is why AEMO requires this information requested in clause (a).</p> <p>PLUS ES acknowledges AEMO's comments and respectfully disagree. There is an opportunity to drive efficiency in the consultation space with the procedure being open for consultation irrespective of the trigger. Both AEMO and Participants are equally under resourcing constraints and raising and progressing an ICF to consultation and beyond is not a small undertaking.</p>	
27	3.7 Current MC's Obligations during the Exemption Period	Updated point 3.7(b) to advise that exemptions can't be extended.	AGL	Noted	
28	3.7 Current MC's Obligations during the Exemption Period	Updated point 3.7(b) to advise that exemptions can't be extended.	CitiPower Powercor	No comment	
29	3.7 Current MC's Obligations during the Exemption Period	Updated point 3.7(b) to advise that exemptions can't be extended.	United Energy	No comment	
30	3.7 Current MC's Obligations during the Exemption Period	Updated point 3.7(b) to advise that exemptions can't be extended.	PLUS ES	<p>PLUS ES supports there would be greater efficiency if the timelines of exemption applications and extensions were aligned.</p> <p>Whilst AEMO have a consistent timeframe of 10 business days to approve, the metering malfunction extensions have at least 7 days to submit, and the small customer exemptions have 30 business days.</p> <p>PLUS ES proposes AEMO considers the possibility of aligning the timeframes for extension applications irrespective if it is a metering malfunction extension or a new application as is with small customer exemptions, to drive</p>	<p>AEMO notes the respondent's comment and clarifies the processes mentioned in the respondent's comment are two separate processes and as a result timeframes need to be different to reflect the different processes.</p>

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				downstream efficiencies for participants managing their exemptions.	
31	4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	AGL	<p>...requires the exemption to continue...a new exemption application</p> <p>Suggest a re-write as the exemption is not continuing, but a new exemption is being issued to replace one which has ended, due to the change in MC.</p>	AEMO notes the respondent's comment and has updated the procedure to avoid confusion.
32	4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	CitiPower Powercor	No comment	
33	4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process – Clause (a)	PLUS ES	<p>PLUS ES seeks clarification of the purpose of clause (a), especially as the current MC is notified that a new MC has been nominated via MSATS notifications. AEMO also has access to these notifications.</p> <p>For efficiency and streamlined processes PLUS ES proposes that the clause is deleted.</p>	AEMO agrees the respondent's comment and has deleted the clause from the procedure.
34	4.2 Application for Exemption if No Change in Circumstances	Clause (b)	PLUS ES	<p>Section 4.1 of this Guideline states that an existing exemption is not transferrable to a new MC. It is then reasonable to determine that the new MC will need to apply for a new exemption.</p> <p>Hence, PLUS ES seeks clarification on the benefits of the additional requirements such as statutory declarations and a restriction of 5 business days. The new MC should be referred to the relevant section of the Application Process where they need to provide the supporting documentation to justify the exemption.</p> <p>The Guideline does not include the scenario where a new MC requires an exemption and they do not</p>	AEMO notes the respondent's comment and has updated the clause to reflect that this is a new exemption application and requires supporting info as per section 3.3 of the procedure.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				raise the exemption within 5 business days of becoming MC.	
35	4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	United Energy	No comment	
36	4.2 Application for Exemption if No Change in Circumstances	Updated section to reflect the new automated exemption process	Vector Metering	<p>CL 4.2.(a) requires the current MC to notify AEMO if a retailer or another MC raises a CR to change the MC role on a NMI where an exemption is granted. It is unclear why the MC must notify AEMO when it is the AEMO system that notifies the MC of a change in MC. This is inefficient. AEMO should have a report that provides this. It is also not documented how the current MC must notify AEMO. Is this by email? Please clarify.</p> <p>CL 4.2(b) - It is unclear how the New MC will know when a NMI it has been nominated in the MC role is part of an existing exemption list raised by the old MC. The Guideline makes reference to the change of status to MCCHURN but it is unclear if the New MC can view the details of the exemption raised against a NMI by the old MC. Given the MC has only 5 business days to lodge for a continuation then MC's should be pushed a notification where the exemption exists. Email would do, alternately if the MCCHURN report is the report MC must reply on then this should be pushed daily.</p>	AEMO notes the respondent's comment and refers to table 2, items 33 and 34.
37	4.3 Change in Circumstances	Deleted reference to Appendix A	AGL	Noted	
38	4.3 Change in Circumstances	Deleted reference to Appendix A	CitiPower Powercor	No comment	
39	4.3 Change in Circumstances	Deleted reference to Appendix A	PLUS ES	This section enables the new MC to submit an exemption application when a change in	AEMO notes the respondent's comment and has deleted the word "New" from the

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				<p>circumstances affect the availability of a telecommunications network. What is the definition of a new MC for this clause. PLUS ES proposes that a timeframe is defined for which the latest appointed MC is considered 'new'.</p> <p>PLUS ES has raised previously a gap in the Guideline. Whilst the new MC can submit an exemption application if circumstances affect the availability of a telecommunication network, it does not afford the current MC the same allowance. Please also refer to our second dot point against section 3.4.</p> <p>PLUS ES proposes that this process is also available to the current MC as they are valid existing scenarios.</p>	clause to avoid confusion, as any party in the MC role can perform the obligation.
40	4.3 Change in Circumstances	Deleted reference to Appendix A	United Energy	No comment	
41	Appendix A. Application for Exemption	Deleted Appendix A	AGL	Noted	
42	Appendix A. Application for Exemption	Deleted Appendix A	CitiPower Powercor	No comment	
43	Appendix A. Application for Exemption	Deleted Appendix A	United Energy	No comment	

Table 3 Metering Installation Exemption Guideline (New Document)

No.	Section	Stakeholder	Participant comments	AEMO response
1	General Comment	Vector Metering	<ul style="list-style-type: none"> Until all the issues raised by participants are dealt with it and the final user interface is available is difficult to finalise this guideline. If this guideline is to contain instructions regarding management of 	AEMO notes the respondent's comment and clarifies that this guideline does not require formal

No.	Section	Stakeholder	Participant comments	AEMO response
			exemptions via the online portal then we expect a further review will be required once the portal goes live.	consultation. If updates are required, a new version can be released without consultation.
2	3.1 Generally	AGL	AGL queries whether all exemption requests have agreed dates ? If not, suggest delete the word 'agreed'	AEMO agrees with the respondent's comment and has updated the guideline accordingly.
3	3.1 Generally	CitiPower Powercor	No comment	
4	3.1 Generally	United Energy	No comment	
5	3.2 Responsibility	AGL	Noted	
6	3.2 Responsibility	CitiPower Powercor	No comment	
7	3.2 Responsibility	United Energy	No comment	
8	3.3 Supporting Information to support Application	AGL	Noted	
9	3.3 Supporting Information to support Application	CitiPower Powercor	No comment	
10	3.3 Supporting Information to support Application	United Energy	No comment	

No.	Section	Stakeholder	Participant comments	AEMO response
11	General	AGL	Screen shots still very low resolution and need to be enhanced.	AEMO notes the respondent's comment and clarifies that screenshots have been updated as part of this the final determination release as they were only initial mock-up screens.
12	4.1 Exemption life cycle	AGL	Noted	
13	4.1 Exemption life cycle	CitiPower Powercor	<p>Section 4.1 states that each exemption may contain between 1 to 100,000 NMIs that are of the same Exemption category, Exemption type and Nature of exemption. When AEMO approves an exemption with a large number of NMIs and notifies the participants that the exemption has been approved, it is expected that AEMO will send eligible participants a CATS Notification for every NMI in the exemption, with these notifications appearing in participants' OutBox. Approval of exemptions that contain large numbers of NMIs has the potential to flood the market and potentially generate Stop Files (if participants cannot process these notifications quickly enough).</p> <p>CitiPower Powercor queries if such exemption approval notifications will be throttled so as to avoid Stop Files?</p>	AEMO notes the respondent's comment and agrees there might be a large amount of NMIs to be processed, however AEMO will not be throttling notifications.
14	4.1 Exemption life cycle	United Energy	<p>Section 4.1 states that each exemption may contain between 1 to 100,000 NMIs that are of the same Exemption category, Exemption type and Nature of exemption. When AEMO approves an exemption with a large number of NMIs and notifies the participants that the exemption has been approved, it is expected that AEMO will send eligible participants a CATS Notification for every NMI in the exemption, with these notifications appearing in participants' OutBox. Approval of exemptions that contain large numbers of NMIs has the potential to flood the market and potentially generate Stop Files (if participants cannot process these notifications quickly enough).</p> <p>United Energy queries if such exemption approval notifications will be throttled so as to avoid Stop Files?</p>	AEMO notes the respondent's comment and refers to table 3, item 13.
15	4.2 Navigation to exemptions	AGL	Noted	
16	4.2 Navigation to exemptions	CitiPower Powercor	No comment	
17	4.2 Navigation to exemptions	United Energy	No comment	
18	4.3 Exemption list	AGL	Noted	


No.	Section	Stakeholder	Participant comments	AEMO response
19	4.3 Exemption list	CitiPower Powercor	No comment	
20	4.3 Exemption list	PLUS ES	PLUS ES seeks clarification how one can filter and identify exemption codes and by types via the Portal. I.e a metering malfunction exemption vs small customer, a malfunction exemption – family failure etc.	AEMO notes the respondent's comment and clarifies that it is not possible to filter by type via the portal. A CSV file of all the MC exemptions can be downloaded and this can be done manually. MCs can download those CSV files anytime
21	4.3 Exemption list	United Energy	No comment	
22	4.4 Creating a new exemption	AGL	Noted	
23	4.4 Creating a new exemption	CitiPower Powercor	No comment	
24	4.4 Creating a new exemption	PLUS ES	PLUS ES notes that an Exemption ID is provided when the submitted application is accepted and validated. The Procedure notes that AEMO has 2 business days to provide the ID. There should be an alignment between the outcome and the obligations.	AEMO notes the respondent's comment and refers to table 1, item 14.
25	4.4 Creating a new exemption	United Energy	No comment	
26	Technical /Design details.	PLUS ES	There is pertinent technical/design information which will impact MCs in the design of their supporting exemption processes. Information which remains unknown. For example, what is the maximum allowable characters for the Action Taken and Action Reason field? If efficiencies are to be driven by the MC, they need to know how to populate these fields and what limitations exist. The Procedure has a requirement of information to be provided and the Automated Process tool needs to enable the capability.	AEMO notes the respondent's comment and has updated the technical specifications to include all API fields details.
27	4.5 Reviewing an exemption	AGL	Noted	
28	4.5 Reviewing an exemption	CitiPower Powercor	No comment	
29	4.5 Reviewing an exemption	PLUS ES	PLUS ES seeks clarity on the use of APIs and notifications of updated statuses of exemptions. Do Participants have to rely on the SDQ reports for such status updates which cannot be derived by the	AEMO notes the respondent's comment and clarifies that SDQ reports will not include status updates. The MC can

No.	Section	Stakeholder	Participant comments	AEMO response
			updating of MSATS fields. For example, will statuses such as, For review, More Info etc be pushed to the participants?	monitor the progress of the exemption in the portal. The Exemption list window (or related API) can be used to identify lists of exemptions with a specific status. AEMO has updated the guideline to include more details on that.
30	4.5 Reviewing an exemption	United Energy	No comment	
31	4.6 Providing more information	AGL	Noted	
32	4.6 Providing more information	CitiPower Powercor	No comment	
33	4.6 Providing more information	PLUS ES	PLUS ES raises the concern of NMIs being rejected during validations and the reason why they have been rejected is not stated will cause downstream inefficiencies. Since AEMO's solution rejects on a failed validation it recognises the validation failed. The solution should provide the MC with the reason, otherwise how is the MC to know what caused the NMI to reject? As noted in this Guideline there are several reasons why a NMI may be rejected during validation.	AEMO notes the respondent's comment and clarifies the reason for rejecting a NMI can be found in the CSV downloaded file from the API for the list of exemptions. AEMO has updated the guideline to include this information.
34	4.6 Providing more information	United Energy	No comment	
35	4.7 Managing an exemption	AGL	<p>C L 4.7.2 indicates AEMO will notify Participants 21 days prior to the exemption expiry date.</p> <p>CI 3.7(b) of the Exemption Guideline indicates that AEMO will notify participants 30 business days prior to an exemption expiring.</p> <p>Is the notification in CI 4.7.2 another notification ?</p> <p>Also note the lack of consistency between days and business days in these documents.</p>	<p>AEMO notes the respondents comment and clarifies this is not the same notification, the MC obligation is 30 business days to tell AEMO prior to an exemption expiring, and AEMO's obligation is to notify 21 days prior to the exemption expiry date.</p> <p>AEMO clarifies that system days are "calendar days" and not "business days".</p>

No.	Section	Stakeholder	Participant comments	AEMO response
36	4.7 Managing an exemption	CitiPower Powercor	No comment	
37	4.7 Managing an exemption	United Energy	No comment	
38	4.7.3 Churn of MC	PLUS ES	<p>The last Paragraph of the section - <i>If the new MC...expiry of exemption.</i></p> <p>This requirement is only applicable for the small customer exemption guideline. PLUS ES in addition to questioning the requirement of a stat dec also recommend the paragraph is removed to make the section applicable for all exemptions.</p> <p>Additionally we recommend providing the clarification that AEMO's solution will be updating the NMI status in an exemption to MC Churn, when it occurs in MSATS, without further notification requirements from the 'Old' or the 'New' MC.</p>	<p>AEMO notes the respondent's comment and refers to table 2, item 34 regarding the statutory declaration.</p> <p>AEMO clarifies that MC churn will be updated as part of our batching process and updating the NMI standing data to remove the exemption number and expiry data.</p>
39	4.8 Viewing closed exemptions	AGL	If an exemption is incorrectly closed, will an MC have to re-submit all information again, or can AEMO reverse the closure ?	AEMO notes the respondent's comment and clarifies a new application will be required with all the information.
40	4.8 Viewing closed exemptions	CitiPower Powercor	No comment	
41	4.8 Viewing closed exemptions	United Energy	No comment	
42	4.9 Exemption notifications	AGL	Noted (inc 21 calendar day notifications)	AEMO notes the respondent's comment.
43	4.9 Exemption notifications	CitiPower Powercor	<p>CitiPower Powercor identifies four items as follows:</p> <p>CitiPower Powercor notes that as part of the Meter Exemptions Consultation, 4 new SDQ reports are defined as per the following screen print:</p>	<p>AEMO notes the respondent's comment and provide the following responses regarding the following points:</p> <ol style="list-style-type: none"> 1. AEMO will update the SDQ reports to include QueryId as per the respondent's comment.

No.	Section	Stakeholder	Participant comments	AEMO response
			<p>4.9. Exemption notifications</p> <p>Letters and correspondence will not be sent for metering exemptions in this automated process. It is the participants responsibility to monitor and manage the exemption progress.</p> <p>However new Standing Data Quality (SDQ) checks will be included into the weekly reporting to Metering Co-ordinators, The SDQ checks will be:</p> <ul style="list-style-type: none"> • ME_EXPIRE_SOON <ul style="list-style-type: none"> ○ Description: Identifies metering exemptions due to expire in the next 2144 calendar days ○ Header details: ParticipantID, RoleID, ExemptionID, sdr_key_2, sdr_key_3, Exemption_Start_Date, Exemption_End_Date, Status, Category, Type, Nature, NMI_Qt • ME_EXPIRED <ul style="list-style-type: none"> ○ Description: identifies metering exemptions that have reached the expiryend date and have been updated to expired ○ Header details: ParticipantID, RoleID, ExemptionID, sdr_key_2, sdr_key_3, Exemption_Start_Date, Exemption_End_Date, Status, Category, Type, Nature, NMI_Qt • ME_MC_CHURN <ul style="list-style-type: none"> ○ Description: NMI assigned to an Exemption has changed MC and is no longer exempt. ○ Header details: QueryId, Stat_Date, ParticipantId, RoleId, Source, Table, NMI_ID, ME_ID, Sdr_Key_3, Start_Date, End_Date, Field, ME_Status, Category, Type, Nature, Old_MC • ME_T4A_REVIEW <ul style="list-style-type: none"> ○ Notify the Metering Co-ordinator when an exemption with an Exemption category of Type 4A has been Approved or Rejected ○ QueryId, Stat_Date, ParticipantId, RoleId, Source, Table, NMI_ID, ME_ID, Sdr_Key_3, Start_Date, End_Date, Field, ME_Status, Category, Type, Nature, Old_MC <p>The way the SDQ reports have been described in the document is not consistent with the standard SDQ format e.g. each SDQ report contains a QueryID (as per the red highlighted reports above), whereas in the ME_EXPIRE_SOON & ME_EXPIRED reports, the QueryId is missing.</p> <hr/> <p>The last paragraph of section 4.9 in the METERING EXEMPTIONS GUIDELINE says the following:</p>	<p>2. AEMO has added the note about the exemption fields being there but with no data when the exemption is cancelled or resolved as per the respondent's comment however the xml example cannot be added as this is the standard xml format.</p> <p>3. AEMO clarifies that notifications will not be sent if the exemption extension is not approved, it will be expired and as a result blank fields will be received.</p> <p>4. AEMO agrees with the respondent's comment, a defect has been raised to fix this issue in the xml file.</p>


No.	Section	Stakeholder	Participant comments	AEMO response					
			<p>Upon resolution or cancellation of a <u>metering installation malfunction</u> exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101 has completed. This notification will remove the <u>metering installation malfunction</u> exemption number and expiry date.</p> <p>In the Draft Determination feedback (Table 4, Item 89), it states “AEMO notes that the field names will be there but with no data as per standard xml format”.</p> <p>CitiPower Powercor recommends AEMO include this feedback into the above paragraph of the Guideline and provide a sample CR5101 xml for a cancelled/resolved exemption.</p> <hr/> <p>CitiPower Powercor queries if an extension to an exemption is requested, will the MC & other participants be notified (via a CR5101) with a new Expiry Date when the extension is approved. If the extension is not approved, what notification will AEMO send to the participants?</p> <hr/> <p>Part of the consultation feedback published in the Draft Determination on 16 June 2023, that the CR5101 for removal of MME (cancelled/resolved), the field names will be provided but with no data:</p> <table border="1" data-bbox="600 874 1476 983"> <tr> <td data-bbox="600 874 748 983">89</td> <td data-bbox="748 874 853 983">4.9 Exemption notifications</td> <td data-bbox="853 874 1077 983">CitiPower Powercor</td> <td data-bbox="1077 874 1245 983">CitiPower Powercor would like clarification on the paragraph relating to "Upon resolution or cancellation of an exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101</td> <td data-bbox="1245 874 1476 983">AEMO notes that the field names will be there but with no data as per standard xml format.</td> </tr> </table> <p>However, the schema ElectricityMasterStandingData_r43.xsd does not seem to allow for a null MeterMalfunctionExpiryDate (this may be an oversight in the schema)...</p>	89	4.9 Exemption notifications	CitiPower Powercor	CitiPower Powercor would like clarification on the paragraph relating to "Upon resolution or cancellation of an exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101	AEMO notes that the field names will be there but with no data as per standard xml format.	
89	4.9 Exemption notifications	CitiPower Powercor	CitiPower Powercor would like clarification on the paragraph relating to "Upon resolution or cancellation of an exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101	AEMO notes that the field names will be there but with no data as per standard xml format.					


No.	Section	Stakeholder	Participant comments	AEMO response
			<pre> </xsd:documentation> </xsd:annotation> <xsd:group name="ElectricityNMI MasterGroup"> <xsd:annotation> <xsd:documentation> Purpose - Common NMI Master elements across Standing Data and Change Requests </xsd:documentation> </xsd:annotation> <xsd:sequence> . . . <xsd:element name="MeterMalfunctionExemptionNumber" type="MeterMalfunctionExemptionNumber" nillable="true" minOccurs="0"/> <xsd:element name="MeterMalfunctionExemptionExpiryDate" type="xsd:date" minOccurs="0"/> . . . </xsd:sequence> </xsd:group> <xsd:complexType name="ElectricityMasterStandingData"> <xsd:annotation> <xsd:documentation> Purpose - container for non-repeating standing data associated with an electricity NMI </xsd:documentation> </xsd:annotation> <xsd:sequence> . . . <xsd:element name="MeterMalfunctionExemptionNumber" type="MeterMalfunctionExemptionNumber" nillable="true" minOccurs="0"/> <xsd:element name="MeterMalfunctionExemptionExpiryDate" type="xsd:date" nillable="true" minOccurs="0"/> . . . </xsd:sequence> </xsd:complexType> </pre> 	
			<p>A sample CR5101 xml gives the following (schema validation) error when NOT populating the expiry date:</p>	

No.	Section	Stakeholder	Participant comments	AEMO response
			 <p>CitiPower Powercor seeks clarification on this.</p>	
44	4.9 Exemption notifications	PLUS ES	<p>Clarification is sought with respect to ME_T4A_REVIEW SDQs. The Guideline states it will notify the MC when an application has been approved or rejected. How will the MC be informed when these exemptions are closed/expired as the exemption ID and expiry date is not in MSATS? Will they be included in the ME_EXPIRED SDQ?</p> <p>PLUS ES also has concerns and clarification sought if they have to wait for a weekly report to identify status updates or rely on monitoring the portal for status updates, especially with respect to the potential volumes. The earlier option may cause a non-compliance for the MC and the latter increases the MC's resourcing effort to manage.</p>	<p>AEMO notes the respondent's comment and clarifies the MC can manage the exemption through the portal. Information on exemption status can be found immediately by logging into the portal.</p>

No.	Section	Stakeholder	Participant comments	AEMO response
45	4.9 Exemption notifications	United Energy	<p>United Energy identifies four items as follows:</p> <p>5. United Energy notes that as part of the Meter Exemptions Consultation, 4 new SDQ reports are defined as per the following screen print:</p> <div data-bbox="622 408 1514 1198" style="border: 1px solid #ccc; padding: 10px; margin: 10px 0;"> <p>4.9. Exemption notifications</p> <p>Letters and correspondence will not be sent for metering exemptions in this automated process. It is the participants responsibility to monitor and manage the exemption progress.</p> <p>However new Standing Data Quality (SDQ) checks will be included into the weekly reporting to Metering Co-ordinators, The SDQ checks will be:</p> <ul style="list-style-type: none"> • ME_EXPIRE_SOON <ul style="list-style-type: none"> ○ Description: Identifies metering exemptions due to expire in the next <u>2144</u> calendar days ○ Header details: ParticipantID, RoleID, ExemptionID, sdr_key_2, sdr_key_3, Exemption_Start_Date, Exemption_End_Date, Status, Category, Type, Nature, NMI_Qt • ME_EXPIRED <ul style="list-style-type: none"> ○ Description: identifies metering exemptions that have reached the <u>expiryend</u> date and have been updated to expired ○ Header details: ParticipantID, RoleID, ExemptionID, sdr_key_2, sdr_key_3, Exemption_Start_Date, Exemption_End_Date, Status, Category, Type, Nature, NMI_Qt • ME_MC_CHURN <ul style="list-style-type: none"> ○ Description: NMI assigned to an Exemption has changed MC and is no longer exempt. ○ Header details: <u>QueryId</u>, Stat_Date, ParticipantId, RoleId, Source, Table, NMI_ID, ME_ID, Sdr_Key_3, Start_Date, End_Date, Field, ME_Status, Category, Type, Nature, Old_MC • ME_T4A_REVIEW <ul style="list-style-type: none"> ○ Notify the Metering Co-ordinator when an exemption with an Exemption category of Type 4A has been Approved or Rejected ○ <u>QueryId</u>, Stat_Date, ParticipantId, RoleId, Source, Table, NMI_ID, ME_ID, Sdr_Key_3, Start_Date, End_Date, Field, ME_Status, Category, Type, Nature, Old_MC </div> <p>The way the SDQ reports have been described in the document is not consistent with the standard SDQ format e.g. each SDQ report contains a QueryID (as per the red highlighted reports above), whereas in the ME_EXPIRE_SOON & ME_EXPIRED reports, the QueryId is missing.</p>	<p>AEMO notes the respondent's comment and refer to table 3. item 43.</p>
			<p>6. The last paragraph of section 4.9 in the METERING EXEMPTIONS GUIDELINE says the following:</p>	

No.	Section	Stakeholder	Participant comments	AEMO response					
			<p>Upon resolution or cancellation of a <u>metering installation malfunction</u> exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101 has completed. This notification will remove the <u>metering installation malfunction</u> exemption number and expiry date.</p> <p>In the Draft Determination feedback (Table 4, Item 89), it states "AEMO notes that the field names will be there but with no data as per standard xml format".</p> <p>United Energy recommends AEMO include this feedback into the above paragraph of the Guideline and provide a sample CR5101 xml for a cancelled/resolved exemption.</p> <hr/> <p>7. United Energy queries if an extension to an exemption is requested, will the MC & other participants be notified (via a CR5101) with a new Expiry Date when the extension is approved. If the extension is not approved, what notification will AEMO send to the participants?</p> <hr/> <p>8. Part of the consultation feedback published in the Draft Determination on 16 June 2023, that the CR5101 for removal of MME (cancelled/resolved), the field names will be provided but with no data:</p> <table border="1" data-bbox="622 874 1496 986"> <tr> <td data-bbox="622 874 772 986">89</td> <td data-bbox="772 874 891 986">4.9 Exemption notifications</td> <td data-bbox="891 874 896 986">CitiPower Powercor</td> <td data-bbox="896 874 1265 986">CitiPower Powercor would like clarification on the paragraph relating to "Upon resolution or cancellation of an exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101</td> <td data-bbox="1265 874 1496 986">AEMO notes that the field names will be there but with no data as per standard xml format.</td> </tr> </table> <p>However, the schema ElectricityMasterStandingData_r43.xsd does not seem to allow for a null MeterMalfunctionExpiryDate (this may be an oversight in the schema)...</p>	89	4.9 Exemption notifications	CitiPower Powercor	CitiPower Powercor would like clarification on the paragraph relating to "Upon resolution or cancellation of an exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101	AEMO notes that the field names will be there but with no data as per standard xml format.	
89	4.9 Exemption notifications	CitiPower Powercor	CitiPower Powercor would like clarification on the paragraph relating to "Upon resolution or cancellation of an exemption all participants who are entitled under the CATS Procedures will receive a Completion Notification when the CR5101	AEMO notes that the field names will be there but with no data as per standard xml format.					

No.	Section	Stakeholder	Participant comments	AEMO response
			<pre> </xsd:documentation> </xsd:annotation> <xsd:group name="ElectricityNMI MasterGroup"> <xsd:annotation> <xsd:documentation> Purpose - Common NMI Master elements across Standing Data and Change Requests </xsd:documentation> </xsd:annotation> <xsd:sequence> . . . <xsd:element name="MeterMalfunctionExemptionNumber" type="MeterMalfunctionExemptionNumber" nillable="true" minOccurs="0"/> <xsd:element name="MeterMalfunctionExemptionExpiryDate" type="xsd:date" minOccurs="0"/> . . . </xsd:sequence> </xsd:group> <xsd:complexType name="ElectricityMasterStandingData"> <xsd:annotation> <xsd:documentation> Purpose - container for non-repeating standing data associated with an electricity NMI </xsd:documentation> </xsd:annotation> <xsd:sequence> . . . <xsd:element name="MeterMalfunctionExemptionNumber" type="MeterMalfunctionExemptionNumber" nillable="true" minOccurs="0"/> <xsd:element name="MeterMalfunctionExemptionExpiryDate" type="xsd:date" nillable="true" minOccurs="0"/> . . . </xsd:sequence> </xsd:complexType> </pre> 	
			<p>A sample CR5101 xml gives the following (schema validation) error when NOT populating the expiry date:</p>	

No.	Section	Stakeholder	Participant comments	AEMO response
			 <p>The screenshot shows an XML document with the following structure:</p> <pre> <?xml version="1.0" ?> <ase:aseXML xmlns:ase="urn:ase:XML:r43" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xsi:schemaLocation="urn:ase:XML:r43 http://www.nemco.com.au/ase/XML/schemas/r43/aseXML_r43.xsd"> <Header> <From>NEMMCO</From> <To>UNITED</To> <MessageID>NEMMCO-MSG-11234569</MessageID> <MessageDate>2001-10-31T13:20:10.000+10:00</MessageDate> <TransactionGroup>CATS</TransactionGroup> <PriorityMedium>Priority</PriorityMedium> <SecurityContext>NEMMCOBATCH</SecurityContext> <Market>NEM</Market> </Header> <Transactions> <Transaction transactionID="NEMMCO-TNS-12345690" transactionDate="2001-10-31T13:20:09.900+10:00"> <CATSNotification> <Role>ANSP</Role> <RoleStatus></RoleStatus> <ChangeRequest> <Participant>NEMMCO</Participant> <RequestID>1136314044</RequestID> <ChangeStatusCode>CM</ChangeStatusCode> <ChangeData> <ChangeReasonCode>S101</ChangeReasonCode> <ActualChangeDate>2020-05-18</ActualChangeDate> <RMIStandingData xsi:type="ase:ElectricityStandingData"> <RMI check="P">660794678</RMI> <MasterData> <MeterMalfunctionExemptionNumber></MeterMalfunctionExemptionNumber> <MeterMalfunctionExemptionExpiryDate></MeterMalfunctionExemptionExpiryDate> </MasterData> </RMIStandingData> </ChangeData> </ChangeRequest> </CATSNotification> </Transaction> </Transactions> </ase:aseXML> </pre> <p>An error message is highlighted in yellow: "Error parsing '' as date datatype. The element 'MeterMalfunctionExemptionExpiryDate' with value '' failed to parse."</p>	
46	4.10 Transition of existing exemptions	AGL	United Energy seeks clarification on this. Noted	
47	4.10 Transition of existing exemptions	CitiPower Powercor	Table 4, Item 96 in the Draft Determination states "AEMO notes that participants will receive all CR5101 notifications as per the MSATS CATS procedure at transition of existing exemptions". CitiPower Powercor requests that this feedback be included in section 4.10 of the Guideline.	AEMO notes the respondent's comment and has updated the guideline accordingly.

No.	Section	Stakeholder	Participant comments	AEMO response
48	4.10 Transition of existing exemptions	United Energy	Table 4, Item 96 in the Draft Determination states “AEMO notes that participants will receive all CR5101 notifications as per the MSATS CATS procedure at transition of existing exemptions”. United Energy requests that this feedback be included in section 4.10 of the Guideline.	AEMO notes the respondent’s comment and refers to table 3, item 47.
49	4.11 CSV formats	AGL	Noted	
50	4.11 CSV formats	CitiPower Powercor	No comment	
51	4.11 CSV formats	United Energy	No comment	
52	4.12 API Navigation	AGL	Noted	
53	4.12 API Navigation	CitiPower Powercor	No comment	
54	4.12 API Navigation	PLUS ES	<p>PLUS ES is seeking API definitions, tech specs and a sandpit/pre prod to test and complete our build. Due to the participant impacts no less than 3 months from go-live. Due to resourcing challenges there is little confidence the build and test can be completed with a shorter timeframe. Some examples:</p> <ul style="list-style-type: none"> • Submit Request API appears to be 2 parts. Why is this not one payload? <ul style="list-style-type: none"> ○ Will an API definition document be Shared? • Please confirm how the ExemptionID is returned. <ul style="list-style-type: none"> ○ In the 200 record of the Submit OR ○ PLUS ES to call Use Get Meter <p>Furthermore, the provisioning of a Sandpit must be made no later than 8weeks of go live date. Currently, Pre pod has been scheduled for early Oct – providing MCs appr 4 weeks. This is insufficient timing to User test, resolve and complete operational work instructions.</p>	<p>AEMO notes the respondent’s comment and clarifies the following:</p> <ul style="list-style-type: none"> - the go-live date is deferred to 4 March 2024. -The tech spec has been released to industry on 31st July 2023. - Preprod will be open for testing from early October 2023. - the Submit API is a multi-part API, as it is a single payload with two parts. First part is the meter exemption applications, and the second part is the NMIs, and all must be done using the one API. - API definition document is released with the tech spec. - The 200-record response will include the exemption ID.

No.	Section	Stakeholder	Participant comments	AEMO response
55	4.12 API Navigation	United Energy	No comment	
56	5.Appendix A	AGL	Noted	
57	5.Appendix A	CitiPower Powercor	No comment	
58	5.Appendix A	United Energy	No comment	
59	5.Appendix A	Vector Metering	<ul style="list-style-type: none"> We have taken note of AEMO's response in item 120 of the draft report regarding Intellihub's submission to this guideline. AEMO expressed an expectation that a Metering Coordinator (MC) should visit a site before submitting an exemption application for a malfunction. While this may be appropriate for larger sites, it is uncommon to visit a small customer's installation before raising an exemption. If visits could be arranged within the regulated time-frame, there would be no need for an exemption, as the malfunctioning meter would have already been replaced. It is valid to raise exemptions when the MC cannot attend the site within the prescribed timeframes in section 7.8.10 of the National Electricity Rules (NER), and we are not aware of any NER rule that requires this site visit. When malfunctions are reported for a meter family, even if the affected population is small, it is physically impossible to visit all impacted sites within 15 business days. The location of the site also affects the speed at which it can be attended to. While it may be relatively easy to visit a site within the regulated timeframe in urban areas, the same cannot be said for geographically remote sites. Attending these sites in rural and regional areas requires careful planning and scheduling, often extending beyond the regulated timeframe. Metering Providers must manage field resources carefully to balance demand from other work, which also has regulated timeframes, impacting their ability to schedule visits for malfunctions. Fault work needs to be scheduled alongside customer-initiated work such as new connections and meter exchanges, which typically take priority due to tight obligations and customer impacts. In sparsely populated areas with limited field resources available, scheduling constraints further affect metering providers. We have concerns that AEMO does not recognise the scenarios exemptions applications are raised and may reject applications without fully understanding the issues faced by Metering Coordinators. 	<p>The objective of this consultation is to reflect the automation of the "exemption application form" and the approval/rejection of this through the portal. Submission of supporting documents (i.e., rectification plan etc.) will still have to be performed manually as the portal was not designed to upload these documents.</p> <p>The review and overhauling of the Exemption Procedures will be initiated at a later time when the AEMC metering review and Rules changes have been completed.</p>

No.	Section	Stakeholder	Participant comments	AEMO response																												
60	5.1.2 Exemption codes – Shared Fuse	PLUS ES	<p>SHARED FUSE: PLUS ES suggests this is a nature of an exemption and not a type of exemption, similar to access issues and should be moved to table 5.1.3.</p> <p>PLUS ES respectfully does not agree with AEMO’s comment and believes this approach adds another level of complexity including downstream reporting, since Shared Fuse may or may not be related to a malfunctioning meter. Shared Fuse is a cause not a type of exemption. For example, the NER and current industry practice do not require us to raise an exemption for a metering installation (non-malfunctioning) which has been delayed due to a shared fuse. We manage it by exception reporting. The Rules do however require us to get an exemption for malfunctioning meters -individual/family failures - which cannot be rectified within the timeframes. i.e. the only reason we would be raising an exemption on a shared fuse is if it was identified as a malfunction, first. If a metering installation is malfunctioning, how does one determine if it is Family or Individual (where the site has a shared fuse) if you need to populate Shared Fuse?</p> <p>Hence PLUS ES’ proposal to remove Shared fuse from Table 5.1.2. (see below proposed Table example)</p> <p>With respect to AEMO’s comment regarding NER clause 7.16.3(c) (7) – this has been met in the industry by the introduction and population of the Shared Isolation Point Flag (SIPF) field in MSATS.</p> <table border="1"> <thead> <tr> <th>CODE TYPE</th> <th>CODE(in the tables)</th> <th>PARENT CATEGORY</th> <th>DESCRIPTION</th> </tr> </thead> <tbody> <tr> <td>EXEMPTION_TYPE</td> <td>DEFECTIVE</td> <td>MALFUNCTION</td> <td>DEFECTIVE / FAULTY METERING EQUIPMENT</td> </tr> <tr> <td>EXEMPTION_TYPE</td> <td>FAMILY</td> <td>MALFUNCTION</td> <td>METER FAMILY FAILURE</td> </tr> <tr> <td>EXEMPTION_TYPE</td> <td>SHARED</td> <td>MALFUNCTION</td> <td>SHARED-FUSE (SHARED SUPPLY)</td> </tr> <tr> <td>EXEMPTION_TYPE</td> <td>NOPUBNWK</td> <td>TYPE4A</td> <td>NO PUBLIC TELECOMS NETWORK</td> </tr> <tr> <td>EXEMPTION_TYPE</td> <td>NOALTNWK</td> <td>TYPE4A</td> <td>NO ALTERNATIVE TELECOMS NETWORK</td> </tr> <tr> <td>EXEMPTION_TYPE</td> <td>ENVIRON</td> <td>TYPE4A</td> <td>PHYSICAL OR ENVIRONMENTAL CONDITIONS PREVENTING REMOTE COMMS</td> </tr> </tbody> </table>	CODE TYPE	CODE(in the tables)	PARENT CATEGORY	DESCRIPTION	EXEMPTION_TYPE	DEFECTIVE	MALFUNCTION	DEFECTIVE / FAULTY METERING EQUIPMENT	EXEMPTION_TYPE	FAMILY	MALFUNCTION	METER FAMILY FAILURE	EXEMPTION_TYPE	SHARED	MALFUNCTION	SHARED-FUSE (SHARED SUPPLY)	EXEMPTION_TYPE	NOPUBNWK	TYPE4A	NO PUBLIC TELECOMS NETWORK	EXEMPTION_TYPE	NOALTNWK	TYPE4A	NO ALTERNATIVE TELECOMS NETWORK	EXEMPTION_TYPE	ENVIRON	TYPE4A	PHYSICAL OR ENVIRONMENTAL CONDITIONS PREVENTING REMOTE COMMS	<p>AEMO notes the respondent’s comment and clarifies this section refers to meter/ meters with malfunction condition connected to a shared supply.</p> <p>This does not refer to meters (without any malfunction) that are connected on shared supply/ shared fuse.</p>
CODE TYPE	CODE(in the tables)	PARENT CATEGORY	DESCRIPTION																													
EXEMPTION_TYPE	DEFECTIVE	MALFUNCTION	DEFECTIVE / FAULTY METERING EQUIPMENT																													
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No.	Section	Stakeholder	Participant comments	AEMO response																																																
61	5.1.3 – Proposed new code – MC Admin	PLUS ES	<p>PLUS ES proposes adding an additional Exemption Nature code of MC Admin, or similar to, to indicate that the installation has not been visited but an exemption has been requested to meet the rules timeframe obligation. As supported by NER Clauses 7.8.10 (a) & (b). That is, the MC is not aware of the nature of the exemption. It is not always possible to visit the site within the timeframes regulated. For example,</p> <ul style="list-style-type: none"> ○ 1000's of meters are deemed to be malfunctioning within the same period such as Family Failures. ○ The same challenges could apply to individual meters, in time of resourcing constraints such as multiple events placing demands on resourcing commitments. <p>PLUS ES has proposed the below amendments to the Table</p> <table border="1"> <thead> <tr> <th>CODE TYPE</th> <th>CODE(in the tables)</th> <th>PARENT TYPE</th> <th>DESCRIPTION</th> </tr> </thead> <tbody> <tr> <td>EXEMPTION_NATURE</td> <td>ACCESS</td> <td>DEFECTIVE</td> <td>ACCESS ISSUE</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>SAFETY</td> <td>DEFECTIVE</td> <td>SAFETY ISSUE</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>TECHNICAL</td> <td>DEFECTIVE</td> <td>SITE TECHNICAL ISSUE</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>CUSTOMER</td> <td>DEFECTIVE</td> <td>CUSTOMER WORK/UPGRADE REQUIRED</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>SHARED</td> <td>DEFECTIVE</td> <td>SHARED FUSE (SHARED SUPPLY)</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>MC ADMIN</td> <td>DEFECTIVE</td> <td>MC ADMIN ISSUE</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>ACCESS</td> <td>FAMILY</td> <td>ACCESS ISSUE</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>SAFETY</td> <td>FAMILY</td> <td>SAFETY ISSUE</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>TECHNICAL</td> <td>FAMILY</td> <td>SITE TECHNICAL ISSUE</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>CUSTOMER</td> <td>FAMILY</td> <td>CUSTOMER WORK/UPGRADE REQUIRED</td> </tr> <tr> <td>EXEMPTION_NATURE</td> <td>SHARED</td> <td>FAMILY</td> <td>SHARED FUSE (SHARED SUPPLY)</td> </tr> </tbody> </table>	CODE TYPE	CODE(in the tables)	PARENT TYPE	DESCRIPTION	EXEMPTION_NATURE	ACCESS	DEFECTIVE	ACCESS ISSUE	EXEMPTION_NATURE	SAFETY	DEFECTIVE	SAFETY ISSUE	EXEMPTION_NATURE	TECHNICAL	DEFECTIVE	SITE TECHNICAL ISSUE	EXEMPTION_NATURE	CUSTOMER	DEFECTIVE	CUSTOMER WORK/UPGRADE REQUIRED	EXEMPTION_NATURE	SHARED	DEFECTIVE	SHARED FUSE (SHARED SUPPLY)	EXEMPTION_NATURE	MC ADMIN	DEFECTIVE	MC ADMIN ISSUE	EXEMPTION_NATURE	ACCESS	FAMILY	ACCESS ISSUE	EXEMPTION_NATURE	SAFETY	FAMILY	SAFETY ISSUE	EXEMPTION_NATURE	TECHNICAL	FAMILY	SITE TECHNICAL ISSUE	EXEMPTION_NATURE	CUSTOMER	FAMILY	CUSTOMER WORK/UPGRADE REQUIRED	EXEMPTION_NATURE	SHARED	FAMILY	SHARED FUSE (SHARED SUPPLY)	<p>AEMO notes the respondent's comment and clarifies the exemption is a condition on site at the metering installation. Any MC, MP and MDP administrative issues are not considered as "Exemption Nature".</p>
CODE TYPE	CODE(in the tables)	PARENT TYPE	DESCRIPTION																																																	
EXEMPTION_NATURE	ACCESS	DEFECTIVE	ACCESS ISSUE																																																	
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No.	Section	Stakeholder	Participant comments				AEMO response
			EXEMPTION_NATURE	MC ADMIN	FAMILY	MC ADMIN ISSUE	
			EXEMPTION_NATURE	ACCESS	SHARED	ACCESS ISSUE	
			EXEMPTION_NATURE	SAFETY	SHARED	SAFETY ISSUE	
			EXEMPTION_NATURE	TECHNICAL	SHARED	SITE TECHNICAL ISSUE	
			EXEMPTION_NATURE	CUSTOMER	SHARED	CUSTOMER WORK/UPGRADE REQUIRED	
			EXEMPTION_NATURE	ACCESS	NO PUBNWK	ACCESS ISSUE	
			EXEMPTION_NATURE	TECHNICAL	NO PUBNWK	SITE TECHNICAL ISSUE	
			EXEMPTION_NATURE	ADMIN	NO PUBNWK	MC ADMIN ISSUE	
			EXEMPTION_NATURE	ACCESS	NO ALTNWK	ACCESS ISSUE	
			EXEMPTION_NATURE	TECHNICAL	NO ALTNWK	SITE TECHNICAL ISSUE	
			EXEMPTION_NATURE	CUSTOMER	NO ALTNWK	CUSTOMER WORK/UPGRADE REQUIRED	
			EXEMPTION_NATURE	ADMIN	NO ALTNWK	MC ADMIN ISSUE	
			EXEMPTION_NATURE	ACCESS	ENVIRON	ACCESS ISSUE	
			EXEMPTION_NATURE	SAFETY	ENVIRON	SAFETY ISSUE	
			EXEMPTION_NATURE	TECHNICAL	ENVIRON	SITE TECHNICAL ISSUE	
			EXEMPTION_NATURE	CUSTOMER	ENVIRON	CUSTOMER WORK/UPGRADE REQUIRED	
EXEMPTION_NATURE	ADMIN	ENVIRON	MC ADMIN ISSUE				
62	6.Appendix B	AGL	Noted				

No.	Section	Stakeholder	Participant comments	AEMO response
63	6.Appendix B	CitiPower Powercor	No comment	
64	6.Appendix B	United Energy	No comment	

Table 4 Retail Electricity Market Procedures – Glossary and Framework

No.	Section	Description	Stakeholder	Participant comments	AEMO response
1	4.4.5 Metering Installation Exemption Guideline	Added new Metering Installation Exemption Guideline document	AGL	Noted	
2	4.4.5 Metering Installation Exemption Guideline	Added new Metering Installation Exemption Guideline document	CitiPower Powercor	<p>CitiPower Powercor recommends applying consistency to the name of the guideline across various communication channels. For example:</p> <ul style="list-style-type: none"> •The Guideline document is titled 'Meter Exemptions Guideline' •Document links on consultation webpage https://aemo.com.au/consultations/current-and-closed-consultations/metering-installation-exemption-automation-consultation refer to the Guideline document as the 'Metering Installation Exemption Guideline' 	AEMO agrees with the respondent's comment and has updated the guideline name to "metering installation exemption guideline" across all documents.
3	4.4.5 Metering Installation Exemption Guideline	Added new Metering Installation Exemption Guideline document	United Energy	<p>United Energy recommends applying consistency to the name of the guideline across various communication channels. For example:</p> <ul style="list-style-type: none"> •The Guideline document is titled 'Meter Exemptions Guideline' •Document links on consultation webpage https://aemo.com.au/consultations/current-and-closed-consultations/metering-installation-exemption-automation-consultation refer to the 	AEMO notes the respondent's comment and refers to table 4, item 2.

No.	Section	Description	Stakeholder	Participant comments	AEMO response
				Guideline document as the 'Metering Installation Exemption Guideline'	

Table 5 Other Issues Related to the metering installation Exemption Automation

No.	Participant comments	Stakeholder	AEMO response
1	<p>Effective Date – 1 Nov 23</p> <p>PLUS ES notes the Metering Exemption Automated Solution AEMO is implementing, is a new tool. Unlike existing market mechanisms, such as CATS, the 'User' Participants are not familiar with the design and workings of this tool without having access to finalised documentations, the opportunity to user test it, validate their assumptions etc.</p> <p>Once they have familiarised themselves with the AEMO solution and confirm solution alignment, Participants will have to develop operational instructions.</p> <p>For this reason PLUS ES supports that the 1 Nov 23 effective date should be a No-Go determination, if the below conditions are met:</p> <ul style="list-style-type: none"> • The technical design/specs including APIs etc is not available to the MC prior to the 1 Aug 23 and • Sandpit and/or Pre-Prod is not available 8 weeks prior to the 1 Nov 23. • The Procedure and Guidelines not been finalised a minimum of 4 months prior to 1 Nov 23, to allow MC to re-engineer and deliver their E2E system/business processes. <p>Additionally, PLUS ES supports that the next available date should be late Feb/early Mar due to the below considerations:</p> <ul style="list-style-type: none"> • Dec and Jan are resource challenged months due to the Christmas Shut down period and personnel leave. • IT system freezes from early Dec until well into late Jan. 	PLUS ES	AEMO notes the respondent's comment and clarifies that taking into consideration the participant feedback on the Draft Report and the discussion around the B2M XML Schema changes, the effective date has been deferred to 4th March 2024.

No.	Participant comments	Stakeholder	AEMO response
	<p>The operational cost impacts to PLUS ES to go live on the 1 Nov 23 without the tested and implemented solution of APIs, finalised Procedures/Guidelines and the associated work instructions would be as follows:</p> <ul style="list-style-type: none"> • Moving from a current BAU to an interim more manual MSATS Browser process to then implement a solution which incorporates APIs • A manual BAU process with efficiencies driven by some system logic will revert to fully manual processes, for inputting, and monitoring, increasing: <ul style="list-style-type: none"> ○ The resource requirements effort significantly ○ The likelihood of human error potentially leading to non-compliance. • Impacting PLUS ES delivery road map with respect to overall release planning and scheduling of resources 		
2	<p>Effective date of consultation</p> <ul style="list-style-type: none"> • During the first-round consultation Vector Metering provided feedback that an effective date of 1 November for the go-live of these procedures was conditional if the issues raised by participants were addressed. • After reviewing the draft response, we believe there are still material issues raised by participants in the first round that still need to be resolved before the new processes can be adopted. This consultation is introducing a new online portal as well as a set of APIs for the management of exemptions. After careful consideration we believe that the use of the online portal will be less efficient for MCs compared to the process in placed today. If Vector Metering were to rely on the online submission then it anticipates additional resourcing will be required to administer MC exemption applications. We have formed the view that the only way we can avoid the additional costs will be to utilise the API's proposed by the consultation and build a system to integrate with AEMO. In order to develop a system to integrate with AEMO the following needs to be available <ul style="list-style-type: none"> ○ The full technical information regarding the API's, end points, for testing and production environments ○ A working test environment to build against. 	Vector Metering	AEMO notes the respondent's comment and refers to table 5, item 1.

No.	Participant comments	Stakeholder	AEMO response
	<ul style="list-style-type: none"> ○ AEMO plan with firm dates or participant and AEMO resources to support full round-trip testing. • Vector Metering would require most of the infrastructure to be in place at least 3-4 months before go-live in order to build an application that utilises the AEMO API's for exemption management. Given that November 2023 is only 3 months away and there are no published dates (that we are aware of) for the technical design documentation, or any firm dates of when a pre-production system will be available, or when AEMO resources are available to support a coordinated testing program, and we have yet to establish a project team to commence design and build to integrate with the AEMO system. We believe it is unlikely we could meet a 1st November go live. • While we initially thought that we could rely on the online submission via the web portal as a interim solution, due to the inefficiencies introduced the portal application we believe this is not a viable option. We therefore propose that these changes be re-scheduled from the 1 November 2023 to May 2024. 		
3	<p>General Comment on this scope of consultation</p> <ul style="list-style-type: none"> • In several instances, participants raised concerns that AEMO dismissed as being 'out of scope' for this consultation. AEMO suggested that participants should bring up ICFs at the ERCF, and industry could consider them through another consultation. We strongly disagree with this approach. • This consultation was prompted by the MSATS Standing Data review (MSDR), where the industry identified potential efficiency gains by having AEMO populate MSATs with exemption details once they were approved. This approach was deemed advantageous as it would eliminate the need for Metering Coordinators (MCs) to notify participants of approved exemptions, while also enhancing transparency for the industry regarding the presence of exemptions. While this change seemed relatively straightforward, we now find ourselves facing a complete overhaul of the exemption processes, including the introduction of a new portal and a revised exemption application process. This direction was taken without obtaining any input from the MCs, who are the most affected participants. While we understand that AEMO is proposing these changes due to the administrative burden placed on their resources in managing exemptions, the proposed changes are burdening MCs with numerous new 	Vector Metering	AEMO notes the respondent's comment and clarifies this consultation was only about the automation of the exemption application form to enable the automation of exemption standing data population. The automation in populating the new exemption fields which were added during the MSDR consultation in 2020 is the main reason and sets out the scope for this consultation.

No.	Participant comments	Stakeholder	AEMO response
	<p>inefficiencies. Feedback provided to AEMO during this consultation attempted to highlight these issues and suggested changes to mitigate these inefficiencies. However, AEMO has either dismissed them as being out of scope or claimed that these issues are existing obligations that cannot be modified.</p> <ul style="list-style-type: none"> Given that this change is not constrained by any other regulatory alteration, such as a NER change where the scope is typically tightly prescribed, the scope of this consultation can, and should, be considerably broad. AEMO has indicated in several instances that changes cannot be made to existing obligations under this consultation, despite other changes being implemented. NER cl. 7.8.10(b) grants AEMO the authority to determine how the exemption process should operate, and it is under this rule provision that AEMO is implementing changes proposed by the consultation. We hope that AEMO will reconsider its position on the changes that have been considered 'out of scope' and find a way to include them in this consultation. Requiring participants to raise new ICFs in the ERCF and subjecting them to a separate consultation when they could easily be addressed within this consultation is inefficient and wasteful, particularly given the limited resources available in the industry. 		

